auDA Strategy Consultation

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Tucows Response: auDA 2026-30 Draft Strategy consultation paper

Tucows appreciates the opportunity to provide feedback on auDA's 2026-30 Draft Strategy consultation paper. As the largest wholesale domain registrar and a leading provider of domain services, the stable and secure operation of the .AU namespace is of great importance to Tucows.

The 2026-30 Draft Strategy positions auDA to evolve beyond its current role as the trusted steward of Australia's .au namespace into a more innovative, outward-looking catalyst for Australia's digital economy. This goal is admirable, and Tucows supports auDA in this effort.

In the spirit of collaboration and partnership, Tucows offers the following input drawn from our perspective as a wholesale registrar offering a broad range of gTLDs and ccTLDs.

Key Concerns from a Wholesale Registrar Perspective

Identity Verification System

Requiring an Australian presence in order to register .AU domains does necessitate some level of confirmation of Australian nexus. However, when considering identity verification, it is crucial to incorporate data protection principles of necessity and proportionality as well as clarity for implementing partners. The Draft Strategy is unclear as to whether auDA's proposed online identity service will be mandatory or optional, as well as if it will be provided free of charge or will incur costs for registrars. Further, existing verification systems already in use should remain acceptable, and care should be taken to reduce potential duplication of effort and technical integration challenges.

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AI-Based Registration Validation

The appeal of LLM-based services cannot be denied, and we support this initiative in principle, but more detail should be provided about potential effects on real-time domain provisioning, as any disruptions could be significant. There is risk of delays or complications in automated registration flows if AI flags are overly sensitive. We would advocate for early registrar input on the design and rollout of any AI-based validation process.

Cybersecurity & Compliance Expectations

Tucows supports improved security, but has concerns about the **scope and burden** of adopting ISM and Zero Trust models across registrar networks. We look forward to **clear, compliance guidance** for registrars and resellers and note the need for **sufficient implementation timelines** and tooling support.

Operational Impacts on Reseller Channel

As a wholesale registrar, it is crucial that any new identity, validation, or security requirements must be **scalable and automatable** for resellers. Changes should not disrupt **existing registrar-reseller integration**s.

Transparency and Early Engagement

Tucows appreciates this Draft Strategy consultation and requests continued ongoing early, detailed consultation before finalising new systems or frameworks. We would emphasize collaboration to preserve operational efficiency while supporting strategic goals.

Consultation Framework Questions

Does auDA's Draft 2026-30 Strategy establish a clear strategic direction for the organisation?

The Strategic Plan is organised around Trust, Innovation, Impact, and Capability. Each pillar has measurable Objectives & Key Results (OKRs) and a pipeline of strategic projects phased across 2026-30. The strategic direction is clear within the Draft Strategy.

Will auDA's Draft 2026-30 Strategy support it to deliver on the proposed strategic purpose and vision by 2030?

In the Draft Strategy, auDA re-affirms its purpose "to ensure the secure and reliable operation of .au and the internet's naming system, and champion an open, free, secure and interoperable internet" and its vision that ".au is the primary online identity for Australian individuals and organisations, supported by a nimble and resilient auDA." These purposes and vision can be achieved by following the Draft Strategy.

Does auDA's Draft 2026-30 Strategy effectively position auDA to meet the operational challenges and capitalise on the opportunities it faces over 2026-30?

The Draft Strategy has the potential to position auDA to meet challenges and take up opportunities, but there are potential pitfalls to be avoided. Tucows encourages auDA to ensure any new requirements do not pose significant implementation challenges for registrars.

Kind Regards,

Ashley La Bolle, Vice President of Domains