

Australian Vice-Chancellors' Committee

the council of Australia's university presidents

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AVCC Submission to auDA Discussion Paper New 2LDs

Dear Jo

These are our comments on the Discussion Paper prepared by the Names Panel and circulated by auDA for comments by proponents for new 2LDs.

Background

"The main focus of the Panel will be on whether there is a demonstrated community need for the new 2LD. There is no technical limit to the number of 2LDs that could be created, but auDA's view is that 2LDs should exist for a specific, well-defined purpose that serves to maintain the overall integrity and usability of the .au domain," (auDA Press Release 4 April 2002)

It was in the spirit of auDA Press Release of 24 April 2002 that the AVCC prepared its submissions for 3 new 2LDs – uni.au; university.au and research.au. The purpose for these new domains is very clear and that is to strengthen and reinforce the market profile of the universities in carrying out their businesses both on shore and off shore and in assisting the publicly funded research community in its activities. The decision by the universities to support these initiatives is about the universities securing their positions in a highly competitive international market place for international students and international research.

The AVCC acknowledges the Names Panel purpose "to canvas some broad policy issues" but it questions the need for public comments at this late stage of proceedings "to assist the Panel to formulate its recommendations". The AVCC is concerned that respondents, who prepared their submissions on one understanding, are now being asked to comment on issues outside the Panel's terms of reference. The policy statement by the Board of auDA was clear - "whether there is a demonstrated community need for the new 2LD ...for a specific, well defined purpose that serves to maintain the overall integrity and usability of the au. Domain." The AVCC asserts that there is a demonstrated community need and a well defined purpose for the new 2LDs it has sought and that these domains will in no way compromise the overall integrity and useability of the .au domain.

The following comments address each of the headings in the auDA discussion paper.

Issues for Consideration

The Panel considers that the addition of a number of closed 2LDs would introduce a very major change to the Australian Domain Name System – that is, an “all or nothing” arrangement, and that Australian 2LD structure is working well now. The Panel opines that “the onus is squarely on the proponents of change to demonstrate that the change will bring commensurate benefits to Australian and international Internet users as a whole.”

The AVCC agrees that the DNS is working well, but it believes that widening the range of 2LDs will greatly improve its utility, certainly in respect of the new 2LDs that the AVCC has proposed.

1. Preservation of the overall integrity and usability of the .au domain space

The AVCC supports the Names Panel proposal to maintain the existing structure of the au. domain, especially in enhancing the usability of the domain by providing intuitive navigation. Indeed, the AVCC proposals enhance the intuitive nature of the domain, as the words uni, university and research are, in themselves, intuitive. There is no doubt the universities will maintain their existing registrations in other domains, such as .edu.au and .com.au, as each individual university perceives its marketing advantages. From the universities’ point of view they will try to anticipate the intuitive behaviour of internet users in ways that maximises their chances of capturing internet based enquiries at minimum cost. This will provide a commensurate benefit to internet users as their chances of finding the information they seek in their first enquiry is enhanced.

There is no doubt that the current 2LDs are well known, which is no surprise given that there are not many of them. This is simply a historical fact and it in no way reflects the utility of the current domain. The optimum number of closed 2LD is unknown. However, the AVCC believes that the play of market forces will define the optimum number of 2LDs, and the high costs associated with providing registry and registrar services will discourage frivolous proposals. It is estimated that each closed 2LD costs about \$250,000 per annum to operate and manage. The universities will meet the costs of university.au, uni.au and the publicly funded research bodies will meet the costs of research.au.

The “guessability” and “memorability” of university.au, uni.au and research.au as 2LDs are not at issue because all are intuitive.

2. DNS hierarchy issues

The AVCC has no concern about the usefulness of edu.au and it is expected that the universities will continue to maintain their registrations in this domain. The university.au and uni.au domains will have some 50 registrations whereas edu.au has some 7,000, covering universities, TAFEs, schools and an increasing range of other organisations which are less intuitive to the domain. Furthermore, the establishment of uni.au and university.au will have little or no affect on the ongoing viability of edu.au.

There is no compelling reason that the higher education, VET and schools sectors should be viewed as subsets of the existing edu.au regime. While there is some commonality in their function and a level of utility is achieved in them coming under one 2LD, the universities believe that there is added utility to be achieved by the universities in having their own

dedicated 2LDs. The question of utility is what the registrants want, and are prepared to pay for, so that their markets can easily identify and contact them. It is not a debate about how neatly structured the DNS currently is, with 2LDs fitting into historically defined pigeon holes.

Where a common interest group, such as Australia's universities, see substantial benefits in a new 2LD, this should be sufficient grounds for positive consideration of their proposal and, unless there is clear evidence that the proposal will weaken the whole DNS, the proposal should be approved. There is no evidence which suggests that the 3 new names being sought by the universities will, in any way, weaken the DNS. Indeed, the AVCC believes that they will strengthen the DNS because they will make it more relevant to users. The AVCC also believes that the onus should be on auDA to demonstrate how the DNS would be weakened by a proposed new 2LD, if that is its view, and it must define upfront what constitutes a weakening of the DNS. The fact that existing 2LDs might change or go out of existence do not, in themselves, constitute a weakening of the DNS, and, in fact, might well result in a strengthening of the system.

The DNS should not be viewed as a static structure but a dynamic system that is capable of change in order to meet the needs of users. And users' needs will change as perceptions change. So if a particular 2LD is not meeting the needs of its users and, for one reason or another, changes cannot be effected at the management level, then market forces must be allowed to come into play in order to force change. The so-called hierarchy of significance is really nothing more than part of this dynamic process.

3. Purpose of the DNS

The purpose of the DNS has to be multifunctional. Obviously, it has got to facilitate the orderly and successful location of internet addresses. However, given the flexibility of the DNS at the country level it can, and should, facilitate the marketing needs of users. This is the underlying reason why many of the current open and closed 2LDs came into being in the first place, where some sectors saw the marketing potential of the internet. For example, the education sector saw the need for a closed domain – edu.au - which, in its early days, mainly comprised universities and provided the universities and other education base organisations with a separate identity. Similarly, gov.au and csiro.au emerged in the early days. The next level of maturity is now being reached where users are looking for even better market leverage from 2LDs. This is a healthy process and one that will ensure the DNS is relevant to users. There is dynamism about the DNS which includes an element of risk. For example, the risk for the universities in establishing 3 new 2LDS is that they might strike market resistance. The universities however see the benefits far outweighing the risks and they are prepared to make this investment in order to better secure access to their markets.

Understandably, auDA wants to ensure stability of the DNS and this will require a certain level of stability in the 2LDs. The AVCC is confident that auDA has identified appropriate criteria for new 2LDs which will maintain overall stability of the DNS. These are

- the 2LD must be robust, sustainable and viable;
- it must serve the needs of users that are not well served at present;
- there must be clear support among users; and
- it must widen choices for users.

Implicit in these criteria are the bona fides of applicants, the commitment of the common interest group, clear evidence of financial strength and stability and a clear mission statement and membership eligibility criteria which are objective and open to all members of the common interest group.

4. Precedent Setting

The AVCC does not consider the question of setting a new precedent to be a major issue. In fact, the precedent about which the Names Panel expresses concern was set when .csiro.au was established. Furthermore, the decision by the Board to test community interest in new 2LDs is, in itself, another precedent, and it involves an element of risk. However, the universities contend that the 3 new 2LDs they propose, involve a very low level risk for auDA because the common interest group is strong and clearly defined, there is universal support among the Vice Chancellors, the sector is financially sound and the AVCC, as the peak organisation, embraces virtually the entire sector and its revenue base. The university sector is readily identifiable and distinct and, in establishing the 3 new 2LDs as proposed, auDA will not be opening the floodgates for registration of other more diverse groups, such as the professions. AuDA will therefore be able to learn from the experience in approving the 3 new 2LDs for the universities without significantly risking the stability or integrity of the DNS.

5. Commercial advantage considerations

The AVCC considers it appropriate for closed domains to be managed by the peak industry associations, notwithstanding the fact that there may be a problem in some instances in identifying which bodies are the peak bodies. Closed domains are required by auDA to have defined policy and administrative arrangements that allow for input from all registrants, and the ultimate discipline will be registrants being able to vote with their feet.

The issue of commercial advantage is a fact of life. The reason that internet names are issued on a first come, first serve basis is because some names have some inherent value. Indeed, auDA is presently auctioning some internet names because of their commercial value. The AVCC sees the issue being one of systems and processes which are open and fair and which do not disadvantage registrants. The Australian Competition and Consumer Commission has very clear rules in this regard and the whole DNS is subject to the provisions of the Trade Practices Act.

The benefit for peak bodies, in assuming the management of closed domains, is essentially one of financial stability. With the AVCC taking management responsibility of the 3 domains it has sought the financial support of the domains is assured.

6. User demand

The discussion paper raises the question about whether there should be a threshold of user demand for new 2LDs. The AVCC does not consider this to be a major issue. The fact is that registrants who see benefit in establishing a new domain will undertake whatever action is necessary to ensure that their constituents are aware of their domain. Obscure 2LDs will die if they are not successful, which is a risk that registrants will be extremely mindful of because of the disruption to their users.

The Panel also raises the question about multiple registrations in different domains and the costs to registrants of this practice. The AVCC contends that registrants are better positioned to make these decisions than auDA. Registrants will make decisions according to their marketing objectives and their desire to ensure successful access by their constituents. For some organisations low failure rates of first enquiries will be important whereas for other organisations it will be less an issue. Organisations will invest in domain registrations in line with their marketing needs. It is not an issue that auDA needs to unduly concern itself about.

If you have any queries about the issues raised please do not hesitate to call Paul Stubing on 02 62858358 or email paul.stubing@avcc.edu.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Mullarvey', with a long horizontal line extending to the right.

John Mullarvey
Chief Executive Officer