

Australian Vice-Chancellors' Committee*the council of Australia's university presidents*

(A.C.N. 008 502 930 – A.B.N. 53 008 502 930)

PROPOSALS FOR NEW SECOND LEVEL DOMAINS**AVCC COMMENTS ON NEW NAMES ADVISORY PANEL'S DRAFT
RECOMMENDATIONS TO AUDA BOARD****General Comments**

The Australian Vice-Chancellors' Committee (AVCC) responded to auDA's request for submissions for new 2LDs with proposals for university.au, uni.au and research.au as closed domains. These submissions addressed all of the issues identified by auDA, and were lodged within the timeframe set by auDA. auDA invited proposals for both new open and closed domains and did not indicate at that time any preference for either type of domain.

The New Names Advisory Panel now states in its draft paper to the auDA Board "*There is a preference for open 2LDs which permit diversity rather than closed 2LDs which confer advantage to a single organisation or individual.*" This appears to contradict the stated policy of auDA.

The submissions by the AVCC for university.au and uni.au propose eligibility criteria that embrace all universities who are able to use the word university in their title. As the Panel is aware, the word university is reserved under Federal legislation and can only be used by organisations that are, in fact, universities. All Australian universities therefore would be eligible to register in the domains, not just members of the AVCC. It follows that if the domains were open they would achieve no greater diversity, in terms of representing universities, than if they were closed domains. The Panel's concern therefore can only relate to organisations that are not universities, that is, organisations that are closely associated with universities. However, it is pointed out that there are only a limited number of such bodies – may be twelve or so – and the intent is to include all mainstream university related organisations so that there is consistency between the intuitive expectations of users and registrations in the domains.

Given the legal framework that defines a university, it is only appropriate to establish university.au and uni.au as closed domains. By opening the domains Australia runs the risk of undermining this legal framework and the quality services offered by, and importantly, the perception of quality of, our university system.

The AVCC's position, in seeking university.au and uni.au, is that it wants to enhance and improve the marketing position of Australia's universities in attracting international students to study in Australia as well as staff and other university activities. The AVCC contends that this would be in Australia's best interest.

On the question of the Panel's concern about a single organisation or individual having an advantage, presumably this is more a concern about others not being disadvantaged rather than registrants in the 2LD being advantaged. If an organisation, or an individual, in the Australian domain achieves an advantage over international competitors, but does not

disadvantage any other Australian organisations or individuals, then we would hope this would be acceptable to the New Names Advisory Panel. The AVCC expects organisations that register in the domain will achieve an advantage, that is the purpose of the domain. If some organisations choose not to register that is their business decision. The AVCC expects that all universities will register in the domains so that they can achieve this international marketing advantage. (The AVCC is not aware of any university which does not intend to register in the proposed domains. All members of the AVCC comprising 38 of the 39 Australian universities intend to register in the proposed domains)

Specific Comments on university.au and uni.au

The New Names Advisory Panel states that the majority of the Panel agrees that the proposal should not be recommended because;

- *of concern about setting objective eligibility criteria; and*
- *there was not a compelling case for the 2LD to be closed.*

AVCC Comments

Dealing with the first dot point. There are essentially two broad groupings of organisations that would be eligible for membership. These are

- universities; and
- organisations who are directly associated with universities.

The first group are objectively defined in the Australian Quality Framework and are covered by Federal, State and Territory legislation. Whether the 2LDs are open or closed is of no consequence because it will be the same 39 universities who are eligible to register in the proposed domains as proposed by the AVCC. The second group is more difficult to define but they are, nevertheless, clearly identifiable. Eligibility is objectively based on their direct involvement with universities and the higher education sector, and an illustrative list of eligible organisations was provided by the AVCC in its submission. Under the proposed eligibility criteria, Vice-Chancellors, and other members of the governing body, will decide on whether a proposing organisation is eligible or not, if they are not already identified on the illustrative list. The AVCC contends that the Vice-Chancellors would be better placed to make these decisions than certified registrars, as specified under open domain arrangements. And should a proposed registrant be declined he or she can resort to the Dispute Resolution Process, or other legal channels, just as they can under the open domain arrangements.

It is also important to understand that auDA has endorsed edu.au as a closed domain. The AVCC notes that the eligibility criteria for universities, and organisations associated with universities, under edu.au are essentially the same as those which are being proposed for university.au and uni.au. In addition, the administrative arrangements for edu.au are very similar to those proposed for university.au and uni.au, so they are virtually the same in terms of openness and transparency.

With regards to the second dot point, the compelling reason for the domains being closed is that there is no need for them to be open – the interest group is clearly identifiable, and the AVCC is prepared to sponsor their establishment. If university.au and uni.au were open domains they would be much less attractive to potential registrants because they would be subject to the unnecessary and more complex administrative arrangements arising from multiple registrars and resellers. This is what the AVCC believes has happened with edu.au.

Practically all potential registrants are associated with the AVCC, which comprises Vice-Chancellors. The AVCC is willing to be the sponsoring body, as required under the closed domain arrangements, and it will ensure that the integrity of the domains is maintained. All registrants will be consulted on policy and administrative arrangements and a management committee will be established by vote from registrants to oversee the domains. The AVCC contends that the integrity of the domains is much more likely to be compromised under open domain arrangements simply because certified registrars would not have the empathy for the university sector that the Vice-Chancellors have. Being closed domains, and sponsored by the AVCC, will also ensure the financial viability of the domains. The universities will also actively market the domains so that users can quickly identify with them. Open domains, on the other hand, are more removed from the direct influence of interest groups because administration and marketing rests entirely with auDA appointed registrars. For open domains this is probably a desirable thing but for closed domains it makes sense for the registrants to set the policy and administrative parameters.

To summarise, the AVCC contends that as open domains university.au and uni.au can be no more objective in their eligibility criteria than they would be if they were closed domains. They can and will, however, achieve much more for the interest community they represent if they are closed.

The New Names Advisory Panel also reports that some panel members support the proposal as a closed 2LD but with open 2LD attributes (eg objective eligibility criteria).

AVCC Comments

The AVCC supports the view that objective eligibility criteria should apply for closed domains, in much the same way as they do for open domains. The criteria proposed by the AVCC meets this condition.

The New Names Advisory Panel also reports that several panel members do not support the proposal at all (as a closed or open 2LD) because they feel it has not been demonstrated that user needs are not already well served by edu.au.

AVCC Comments

The objective of the universities is simple - it is to enhance the marketing success of Australian universities in the international education market. In broader terms, this market provides Australia with some \$4 billion in export revenues per annum, and is greater than many of our traditional agricultural exports. The edu.au domain cannot achieve this level of market penetration because of its broadness. It covers the entire education and training sector in Australia - schools, TAFES, private training providers, universities and a number of organisations, which arguably should not be able to register in this domain. This brand differentiation cannot be achieved using the edu.au domain because, unlike ac.uk and to a lesser degree edu in the US, edu.au policy allows educational bodies ranging from child care centres to universities to register. Therefore it is difficult if not impossible for universities to differentiate themselves within such a diverse group.

The universities want to ensure their success in connecting with the international higher education market. This can only be good for Australia, in an area where we are actively competing with a number of North American, European and, increasingly, Asian countries. The universities see themselves achieving a competitive advantage by having separate 2LDs with a distinct identity in the international market. Specifically, they feel that dedicated closed 2LDs will optimise this advantage by providing them with management responsibility of the domains. The universities do not believe that the edu.au domain can provide them with this market identity or market penetration. In expressing this view it should be noted though that the efforts by the universities to establish these new closed domains will, in no way, affect the viability of edu.au because the universities will almost certainly maintain their presence in that domain.

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
12 March 2003