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Dear Jo

Name Policy Review Panel Issues Paper

Please find attached comments from ISOC-AU in relation to the Name Policy Review Panel Issues Paper.

Yours sincerely

Tony Hill
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Comments on Name Policy Review Panel Issues Paper

General Comments

ISOC-AU considers that the policies that have been continued by auDA since its establishment generally have been effective and helped to maintain the integrity of the .au domain space. The implementation of these policies has been transparent and that has helped to maintain a high level of confidence among Internet users.

In general, the operation of .au has been effective in maintaining stability of domain names for Australian Internet users and businesses. There has apparently been a low level of requirement for dispute resolution surrounding .au domain names. However, the extent of understanding of the fundamentals of this approach could be increased. For instance, Australian Internet users continue to make comparisons between the open approach for gTLDs compared to the rules applied to our .au ccTLD without understanding the basis for these arrangements.

Continued effective operation of .au will ultimately provide a convincing case in these areas based on market choice. The process could be speeded by provision of better information about not only the fundamentals, but also the policies themselves. Careful attention should be paid to making this information more readily available/accessible.

1. Issues relating to registrant identity and integrity of the Australian DNS

1.1 Verification of registrant identity

ISOC-AU supports the current arrangement for verification of registrant identity and considers that these arrangements have maintained integrity in the .au registry. Effective operation of the Internet is supported by integrity of the registry. ISOC-AU does not support extension of verification arrangements at this time.

1.2 Opening up .au to non-Australian registrants

ISOC-AU does not consider that there is a current need to further open .au to non-Australian registrants across the .au domain name space. There is currently extensive opportunity for non-Australians to access .au that includes any companies or

organisations that have operations based and registered in Australia together with any registrants of Australian trade marks.

There would be significant complications in maintaining the integrity of the .au registry in relation to established information sources unless the current arrangements are maintained. If there was a softening in these arrangements then existing .au domain name holders and other Australians may face weaker protection of their identity on the international Internet.

1.3 Domain name licence periods

ISOC-AU does not consider there is a need to massively extend the current 2-year license period for .au domain names at this time. Experience has demonstrated that Internet users can be subject to scam renewals and a significant increase in the length of licenses could increase the potential opportunities for scam operators. Once there is more experience in operation of the competition regime for .au then potentially an increase in the license period could be considered along with flexibility in the license period.

1.4 Restriction on domain names that match existing TLDs

There is no need to consider relaxing rules surrounding existing ccTLDs and gTLDs for the auDA Reserved List.

2. Issues relating to eligibility criteria for domain names.

2.1 & 2.2 Eligibility criteria for net.au and .asn.au

ISOC-AU considers that there may be a case for less restrictive rules for areas of the .au domain space. It is worth considering whether one or more of the .au 2LD areas could be made less restrictive without affecting the integrity of the registry, effective operation of the registry or the solid foundation that is available for Australian Internet users and businesses. In this instance, it is worth considering .com.au and .org.au as the areas where continued eligibility criteria should apply. Meanwhile, rules for businesses could be relaxed in the area of .net.au and for other organisations in the area of .asn.au. However, there are still views that these 2LDs provide a useful specific purpose in the .au domain space, despite comparatively small numbers of registrations, and if that case is demonstrated then auDA should consider a process for one or two new 2LDs that provide for relaxation of rules.

3. Issues relating to allocation criteria for domain names.

3.1 Close and substantial connection rule

ISOC-AU considers that the implementation of categories of close and substantial connection has not been practical for Internet users. ISOC-AU supports the proposal to move to a general "connection warranty" that the domain name is connected to the registrant in some way. Such a general warranty needs to be accompanied by brief information that refers domain name applicants to auDA's Dispute Resolution Policy and the need to be able to substantiate the connection warranty should a dispute arise.

3.2 Exact match, abbreviation and acronym

ISOC-AU supports implementation of a general connection warranty as discussed above.

3.3 Allocation criteria for id.au

ISOC-AU supports relaxation of derivation rules in relation to .id.au if evidence can be provided that the current rules are demonstrably limiting take up of .id.au. ISOC-AU recommends that prior to implementation of such a relaxation that there be a review of auDRP to ensure that they effectively deal with any resulting disputes.

ISOC-AU
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