One City One Site (OCOS) Working Party

OCOS Working Party
Public Consultation Submission

For

auDA National Reference Group (NRG)

23 January 2004

1. Domain Name Policy Rules and Guidelines

The One City One Site Working Party is extremely impressed with the work of the National Reference Group in reference to the current eligibility criteria and guidelines. Not only has the integrity of the name space been maintained to which it was originally intended but it is also being refined in a straightforward and simplistic manner for the benefit of applicant communities.

Whilst there are obviously more specific criteria placed on this important name space than other name spaces, due to the nature of the applicant group and the intended use of the domain names, the process is being refined in a straightforward manner with the interests of community at heart.

The Working Party also notes and approves of the policy relating to local government. While local government have always been recognized as a key player in both the process and as representatives of the community, but by no means the only player. This is noted particularly in the context that local councils already have their own name space and use of geographic names within that (.gov.au) space. We have always viewed the role as participation and supporting (through endorsement or letter of support for the applicant community group, to which council would be encouraged to be a member). Thus ensuring, on behalf of the community that the town's name is in good hands, it is a 'whole of community' initiative (including council, but not a council one alone) and that resources to council would be minimised (by simply endorsing or approving an applicant group), whilst maintaining the respect of the local authority of council.

The Working Party congratulates the National Reference Group and looks forward to viewing and commenting on additional policy throughout 2004.

2. Registry / Registrar Options

It should be noted that the OCOS Working Party maintains it's support for a single national registry to be created for the 8 2LDs and that this be established through competitive tender of the top level providers in Australia, with exceptional expertise in the registry function. The OCOS Working Party also maintains that auDA as the authority for the .au name space is the most appropriate and qualified body to manage such a tender process and evaluate the applicants in consultation with the National Reference Group, particular in light of costing/pricing models, to ensure on-costs to the community are kept to an absolute minimum.

It would be acceptable for the selected registry to also tender for the registrar function. However it must be qualified that any commercial or non-commercial provider tendering for this role must ensure that ALL policy requirements must be fulfilled by the applicant community group and cross checked by the registrar processing the application details. It will be through a thorough and careful management of the application process, particularly the assessment phase, that disputes will be kept to a minimum, and names provided to the correct representatives within the community with the skills, expertise and community networking abilities to make it the best website asset for the community. Thus resulting in a far more streamlined and successful name space for everyone involved.

The Working Party notes at this point that the following registrar roles have been identified:
" • register and renew domain names in the registry database; and
  • update domain name records."

In the context of the above paragraphs, the Working Party suggests that these roles need to be extended to include the role of assessment and cross checking of the application for the domain name including compliance to all criteria and policy being set by the NRG for the name space and liaising with community on these areas if required, as well as the technical functions indicated. If that is indeed part of the 'technical registrar's' role.

It is clear that such accurate assessing of applications may be more resource intensive (than any of the current existing name spaces in the .au name space) thus potentially more costly to run. It is this factor and the realisation that there are a limited number of names to be registered, that may

prove either too cost intensive to run for commercial providers or too expensive for the community to apply for. A result that would be dire for the name space.

While the OCOS Working Party has favored an appropriate not-for-profit peak organisation to conduct the application process, there is none which exists with the skills or resources to maintain such a responsibility. Ideally to maintain consistency in the application of the policy nationwide an appropriate national body could take on this role. Again, it appears that there is no single appropriate not-for-profit organisation willing to do this. It is this issue and the need for a thorough assessment of applications in the name space that the Working Party presents the following comments on the National Reference Group's (NRG) Registrar options.

Working Party's comments on each of the NRG's Registrar Options

The following comments are made in relation to each option presented by the NRG.

- ***Multiple registrars for all 2LDs.***

  - Multiple registrars for all geo 2LDs are high risk in terms of the consistent and thorough application of policy rules for each application.

  - Not all registrars may wish to be involved.

- ***Single registrar for all 2LDs.***

Ideally a single Registrar, a not-for-profit organisation, with the 'whole of community' interest at heart, would take on the role. The policy would be implied consistently across the nation and dispute resolution may also be handled by the same body, governed by the NRG.

This would be ideal, but it may not be possible to find the right organisation with the right set of skills and resources.

- ***Single registrar for each 2LD, or group of 2LDs.***

A specifically selected registrar in each state and territory would work in ensuring policy is consistently managed within each state and territory.

This is potentially beneficial, as a number of Registrar's get a slice of the market (on a per state/territory basis) meeting the slightly varying needs that may present themselves from state to state. This could also allow for the combining of support services and government assistance, including the packaging of existing project which could benefit communities establishing their community organisation and website, if provided by the relevant state/territory government.

- ***Combined registry/registrar for all 2LDs.***
This could be packaged well and provide the across the board one stop for all needs relating to the domain space. Any interested parties should be invited to tender for registry, registrar or both – and this then be considered when assessing the overall best package. It should not be this option only.

- ***State/territory governments act as registrar in their own jurisdiction.***

This could take a variety of forms, based on needs and requirements on a state-by-state basis, if the Federal government is unable or unwilling to participate and unify the model nationally.

Governments in each state and territory have experience in this function through the management of the .gov.au domain names. There is a central coordination of this through NOIE and auDA.

If government's wish to be involved to ensure support services can be adequately provided to community groups and keep registration costs to a minimum then this option should be made available. There may be many government's that do not wish to take this role, just as there may be many registrars who do not wish to be involved in the new name space for various reasons,

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however this should not immediately rule out those that do wish to be involved for the benefit of the community.

The advantage of governments that wish to take on the role of processing the application in terms of applying the policy and liaising with community where needed or even being involved in the technical registrar functions such as updating the registry etc, comes through their neutral role of ensuring the communities interest are maintained by the accurate management and assessment of groups applying for their domain name. Their interest is in the community not financial profit to made out of the process. Thus ensuring that costs are minimised for community applicants and support is maximised.

Such assessment takes time and resources, which may not be feasible for a commercial provider or may be compromised in the pursuit of running the space at a profit, (particularly in terms of ensuring the applicant groups are suitable and eligible under the policy rules).

The balance may prove to exist where the appropriate state or territory government agency handles the assessment of the application and a commercial registrar or even the selected registry provider is tendered under partnership to the government body to manage the technical allocation, a simple interface between to two streamlining the process, and ensuring that the best result is achieved for applicant communities.

Such involvement may also prove advantageous when considering dispute resolution over domain names in this name space. As it is a community domain space there will almost certainly be disputes to be handled from time to time. Generally when injustices or complaints relating to community issues arise, it is the local Member of Parliament that is engaged in the first instance by community members to solve the problem. If the appropriate state/territory or even federal body is put in place to handle these issues including the accurate assessment of applications (so they don't become dispute cases) disputes will be minimised and the handling of these centralised in a community friendly fashion.

In fact many government's may wish to be involved in the application process just to ensure policy is being implemented correctly and disputes which they may end being asked to deal with are prevented. Minimising costs and maximizing benefit to community. For instance, If an external commercial provider takes on the role and isn't able to assess all applications thoroughly, the government will end up having to handle cases as a dispute most probably channeled through the local MP's office. If they can be part of the application process and assessment of the application in terms of the policy rules – it means they can prevent disputes before they happen. Instead of having to be reactive and deal with them after another provider has allocated the domain name incorrectly.

At a bare minimum any state or territory wishing to actively assist their communities by taking responsibility of handling the application process should be invited to do so as a 2 year trial/tender period. If the process proves to be unsuccessful, the management of that state/territory name space should then be provided for commercial tender.

For state or territories that do not wish to take this path, a commercial registrar can tender for the entire process within the state or territory. As there may be many states or territories they can tender for all if they wish. The same commercial provider could tender for the state/territories who want to manage the application process but need the technical registrar functions outsourced.[1]

Additional Comments

The OCOS Working Party has always maintained that all websites resulting from a domain name from this name space are encouraged to work with ***all sectors of the community***, including local

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[1] See Attachment A –
OCOS Working Party Registrar Options for more information on these registrar options

business and industry, community groups and organisations, sporting/interests/hobbie clubs, news and media, tourism, history, etc.

It is also encouraged that any portals that already exist in the community be invited to participate and at an absolute minimum be invited to be linked to the website associated with the new domain name. Ensuring an inclusive way of finding information on every sector of the community.

A good example of this could be the existing 6 or so web-portals in Ballarat that serve different sectors of the community. These existing sites could easily be linked to the community name site as the representative website for those sectors etc. It by no means ever discourages the great work that both business and community have completed for relevant sectors, these sites aims to enhance the work that has been done by linking to one place while also encouraging sectors who have not had the opportunity to get online to also be included.

If anything, the sites with these new domain names will continue to assist any linked websites though logical and easier methods of promotion through the site. Resulting in a win-win for all parties.

In addition to this there is no reason that if the owners of any existing portal fulfill the criteria, that they themselves cannot apply for the domain name.

Respectfully submitted by the One City One Site Working Party

OCOS Working Party Registrar Options

While the OCOS Working Party has favored an appropriate not-for-profit peak organisation to conduct the application process, there is none which exists with the skills or resources to maintain such a responsibility. Ideally to maintain consistency in the application of the policy nationwide an appropriate national body take on this role. Again, it appears that there is no single appropriate not-for-profit organisation willing to do this. It is this issue and the need for a thorough assessment of applications in the name space that the Working Party presents the following registrar solutions, for the NRG's consideration. These are based on characteristics of the registrar options provided by the NRG

Both Registrar Options provided are based on a single commercial registry for the name space. Allowing each state and territory to opt for one of the following, allowing them to choose based on the state/territories provisions and community needs.

1. **OCOS Working Party Registrar Option One:** *Fully Commercial*

Combined assessment of the application, liaising with community where required, registration of the domain name in the registry database and updating domain names by a commercial provider through a tender process on a per state/territory basis.

Commercial Registrars can tender for multiple states opting for this option, if they choose.

2. **OCOS Working Party Registrar Option Two:**
   Combined Government & Commercial Registry or Registrar Partnership

The relevant state/territory agency (as chosen by the government in question, and can be set up as an independent statutory board sponsored and resources by the government) assess the application including feedback to the community where required. An appropriate partnership with the National Registry provider can be established to provide information to the registry via a technical registrar interface which the government agency uses to register names once approved and update domain name records in the registry
<div align="center">OR</div>

The relevant state/territory agency (as chosen by the government in question, and can be set up as an independent statutory board sponsored and resources by the government) assess the application including feedback to the community where required. An appropriate partnership (by tender) for the technical registrar functions, i.e.: registering names on the registry database & updating domain name records) is established and becomes an automated function through an interface as soon as the application is assessed and approved by the government agency/board.

It should also be noted that it may also be possible for registrars providing services to states and territories under Option One, could also tender for the technical registrar roles in this option.

As all the state and territory government's will also be custodians of the state.au sites, this option allows communities to come to one place for the application process and to access any resources/programs or assistance chosen to be provided by the government. It means streamlining functions and pooling resources in an effective and efficient way and ensures the technical aspects are linked directly to the registry or a partnered registrar, as appropriate, in a timely manner.

While also ensuring that the application process is assessed thoroughly (by a body not profiting financially out of the exercise) with the community interests and needs maintained as the top priority.

The application assessment role by government outlined in this option needs to take place as a not-for-profit exercise. Minimising costs to the community, but also allowing the government to cover the costs of any minor additional resources installed to assist in the streamlined management of the process could be covered by a small portion of the application/registration fee for the domain name, ensuring it is not-for-profit but cost recovery.   Again, assisting in keeping the costs of registering the domain name to a minimum.

Government has the most compatible and stable in-house resources to:
1. Manage the application process for a domain name. Government has the experience through the management of domain name applications in all relevant state/territory .gov.au name space to work in this realm while also having the community liaison and development skills and resources at hand through various government departments/agencies.
2. Provide community liaison support if required and a range of current community related projects (across various departments) which could be packaged to help communities with establishing their not-for-profit community organisation and their new domain name and website. It also allows government to value add the resources already expended and for communities to get greater benefit from and access to these public resources.
3. Represent and serve the community as its core business. As government is in place to serve the community and work in the best interests of the community, it is appropriate that some level of involvement be established to ensure these domain names are allocated and managed in the interest of the community helping to ensure that they become the valuable assets they potentially are for each community.
4. Deal with geographic naming issues and disputes in an independent manner. Each state/territory government has an independent statutory board (the geographic name boards) that while resourced and funded by government makes decisions independently in relation to their work area (allocation of geographic names to community, community resolution processes over naming etc.)
5. Pool resources appropriately to work efficiently and effectively. With such resources in place multiple agencies/projects could be coordinated to manage the process and assist to meet the community's needs.

Government has stability and consistency over lengthy periods of time and is unlikely to dissolve due to issues such as bankruptcy or other risks to destabilizing the management of the name space, which is a realistic risk with commercial providers. Such a careful and managed pooling of existing resources would result in minimum running costs and maximum policy and service delivery for the community.

It is the government that has not only to resources (it already manages the .gov.au registration process in each state/territory) but its core business is to serve the public interest. That is why, for instance the care of geographic names in the physical realm have been managed by a government supported (resourced) Independent Statutory Board – benefiting all parties involved.

In context of this it remains highly unlikely that all state/territory government's will wish to be involved at this level. That being said, the solution for non-state/territory government involved jurisdictions, offered Under Option One may be appropriate

NOTE:
Both options could be subject to contract/tender periods by which the provider must reapply to maintain the contract/service. If either option is not working to its potential then it can be replaced by another Option or another provider at the next contract/tender period. Thus ensuring the best system (and ability to trial a variety of options for different states and territories, based on varying needs) for the community.