

14 March 2018

By Email: policy.review@auda.org.au

Policy Review Panel
c/o .au Domain Administration Ltd
PO Box 18315
MELBOURNE VIC 3001

Dear Sir/Madam

Submission - Registrant Policy: Enabling Australia's Digital Economy and Society

This submission is made in response to the Policy Review Panel Issues Paper *Registrant Policy: Enabling Australia's Digital Economy and Society*.

News Corp Australia (**News**) largely supports the submission of REA Group Ltd (**REA**). In essence our position, like that of REA, is that:

- (a) the decision to implement .au direct registration should be reviewed; and
- (b) if auDA determines that it will proceed with implementation of .au direct registration, News submits that auDA should adopt an order of priority allocation model with first priority given to .com.au registrants.

Should the above not be adopted, then News would also consider the following allocation models (in order of preference), provided that they were implemented with the safeguards outlined in the REA submission:

- (i) Priority access for owners of common law or registered trade marks that are an exact or close match to the direct registration; or
- (ii) A hybrid consensus model with the safeguards described in the REA submission.

News' only point of difference with the position of REA is that we are strongly opposed to a lottery being implemented to allocate the .au domains in any circumstances and therefore it does not appear in the order of priority for possible models referenced above.

However, we agree that if, despite industry views to the contrary, a lottery model is implemented, then at the minimum the safeguards set out by REA should be adopted.

We thank you for the opportunity to comment on these issues and look forward to further industry consultation in regard to these issues.

Yours sincerely

A handwritten signature in black ink, appearing to read "Julian Delany". The signature is fluid and cursive, with a prominent initial "J".

Julian Delany

Managing Director, News DNA