



LINUX AUSTRALIA

Linux Australia Incorporated

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<https://linux.org.au/about-us/organisational-details>
Please contact us at council@linux.org.au

Dear auDA,

Linux Australia Inc. appreciates the opportunity to provide feedback on the proposed administrative changes to the .au Domain Administration Rules: Licensing (.au Licensing Rules).

Firstly, we welcome auDA's mature engagement and approach in this review, and the transparency with which it is being conducted. Linux Australia sees Australia's internet infrastructure as a critical national asset and we have watched auDA's recent corporate transformation closely.

We have specific feedback on three clauses with proposed changes, as outlined below.

2.11.4 - If a Registrant dies

This additional clause is reasonable and sensible and we support its inclusion. auDA may wish to work with legal practitioners who specialise in wills and estates to ensure that boilerplate text aligned with this clause is available for inclusion in estate and business succession planning documents.

2.17.3 - The Public Interest Test

In a time of generative AI, the Public Interest Test should also include a clause for malicious misinformation, for example a website that publishes (non-pornographic) deep fake videos. The prevention of wide-scale misinformation should be a public interest objective and is likely to be a challenge for auDA and other regulatory bodies in the near future. We distinguish here inadvertent misinformation with minimal harm, such as erroneous session times, spelling errors and so on.

Such a change would be in alignment with Principle #6 of auDA's Policy Review Policy - ensuring that policies remain relevant and effective over time.

2.18.3 - Suppression of WHOIS data

The amended Rules should clarify how this clause interacts with Freedom of Information obligations.

Linux Australia would be happy to meet with auDA to further discuss our submission and represent our viewpoints.

Kind Regards,

Joel Addison
President
Linux Australia