



**SUBMISSION TO THE REVIEW OF THE  
STRUCTURE AND OPERATION OF THE  
.AU INTERNET DOMAIN**

*In relation to the operations of the  
.edu.au 'closed' domain*

**Presented on behalf of the  
Australian Information and  
Communications Technology in  
Education Committee  
(AICTEC)**

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## EXECUTIVE SUMMARY

Thank you for the opportunity to provide input into the review.

All activities undertaken by AICTEC relating to the management and administration of the .edu.au domain are designed to support the overall sustainability of the .au Internet domain and the future of the .edu.au 2LD.

Actions are underpinned by the following principles:

- The .edu.au domain should continue to be a closed domain administered by the education and training sector;
- Recognition must be given to the historical circumstances under which registrants registered domain names and the considerable investments that registrants have made in projecting their market presence;
- The .edu.au domain should operate to meet the business needs and marketing ambitions of organisations operating in the education and training sector; and

Costs of running the .edu.au domain will be kept to a minimum and shared equitably by registrants in the domain.

## OVERVIEW

The Australian Information and Communications Technology in Education Committee (AICTEC) welcomes the review of the .au Internet Domain by the Department of Communications, Information Technology and the Arts (DCITA).

As the designated manager of the .edu.au Second Level Domain (2LD), AICTEC aims to:

1. Develop policy for .edu.au in harmony with auDA published policies and practices;
2. Assist the Australian Education and Training sector by administering .edu.au in line with the sector's regulatory arrangements and quality assurance mechanisms; and
3. Enhance Australian education and training services for the benefit of the Australian people and the Internet public in general.

AICTEC is committed to ethical practices for the administration of the .edu.au domain space. *education.au limited* as the .edu.au Registrar shares the commitment through the legal agreement it has with the Commonwealth (on behalf of AICTEC) for its services for the domain.

The agreement is in line with principles espoused by auDA and outlined in the policies and guidelines governing the management of the .edu.au 2LD.

AICTEC maintains the view that it is important to separate policy development and management of the day-to-day operations and the management of the application and renewal process for domain names.

## BACKGROUND

The following points are provided as background to the establishment and operations of the .edu.au domain as a 'closed' second level domain (2LD) intended for use by the Australian Education and Training sector.

- The .edu.au 2LD was originally created by Mr Robert Elz and was administered by him up until October 2001.
- In October 2001, administration of the .edu.au 2LD was transferred from Mr Elz to auDA on an interim basis pending further consideration by the Education and Training sector of the appropriate entity to take on the responsibilities for the .edu.au 2LD.

- In 2001, the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) directed that one of its senior officials' subcommittees, the Australian Information & Communications Technology in Education Committee (AICTEC) should be responsible for the administration of the .edu.au 2LD.
- The Commonwealth is the permanent deputy chair of AICTEC and the entity nominated by AICTEC to act as its contractual representative in matters concerning the administration of the .edu.au 2LD.
- By an agreement titled the *Sub-sponsorship Agreement*, auDA delegated the management and administration of the .edu.au 2LD to the Department of Education Science and Training acting on behalf of AICTEC<sup>1</sup>.
- AICTEC is responsible for issuing domain name licences within the .edu.au domain space.
- AICTEC has in turn delegated its responsibility for policy relating to the .edu.au domain to the .edu.au Domain Administration Committee (eDAC).
- The role of eDAC is to:
  - Establish policies and procedures for the management and administration of the .edu.au domain in consultation with key stakeholders.
  - Determine an overarching policy framework for the governance of domain names in the .edu.au domain.
  - Provide a point of coordination between auDA, education.au limited as the Registrar for .edu.au, and AusRegistry as the .edu.au Registry operator.
  - Communicate with stakeholders on policies and procedures.
  - Review the costs of administering the .edu.au domain.
  - Develop and administer a decision review process.
  - Provide reports to key stakeholder bodies.

## **.EDU.AU POLICY FRAMEWORK**

Under the global Domain Name System (DNS), .au has been delegated as the country name space for Australia and .edu.au has been delegated as the Australian sub-domain for educational institutions.

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<sup>1</sup> The *Sub-Sponsorship Agreement* referred to above is due for renewal in March 2007. auDA has indicated that, as a condition of an ongoing agreement, AICTEC must comply with its rules which are designed to support the sustainability of the entire .au domain.

Because of its defined community of interest, .edu.au is regarded by auDA as a 'closed' second level domain. The arrangement has been made to enable the education and training community to frame its own policies for the allocation of .edu.au domain addresses within the overarching framework for the whole .au domain.

The issue and allocation of .edu.au domain name licences is governed by nine policies that were agreed to by AICTEC in April 2003<sup>2</sup>. These policies are subordinate to, and required to be consistent with, auDA's overarching policies for the .au domain<sup>3</sup>.

The role and process of managing the allocation and issue of .edu.au domain name licences on a day-to-day basis has been delegated to *education.au limited*<sup>4</sup> operating as the Registrar for the domain. The various State and Territory registration and accreditation authorities assist in the validation of licence applications.

The role of maintaining the .edu.au registry is managed under terms of an agreement with AusRegistry Pty Ltd as the provider of registry services to the entire .au domain<sup>5</sup>.

auDA retains final responsibility for .edu.au and can override policy and administrative decisions made by eDAC, AICTEC and/or the .edu.au Registrar.

## REVIEW OF .EDU.AU MAJOR POLICIES

AICTEC has recently conducted a review of major policies governing the review of major policies and, following consultation with stakeholders, has approved the following changes to the structure and operations of the .edu.au domain:

1. Establish a system of Domain Managers along the lines of the existing domain name resellers in the open domains, or similar to the system operating in the .gov.au closed 2LD.
2. Transfer specified domain name data currently held in unofficial registries to AusRegistry (subject to cost considerations).
3. Undertake further investigation of the implications and effect on the .edu.au domain of moving to a four-level name system, following clear principles of domain name construction. This will involve an assessment of the feasibility, policy implications and cost of changes to both the AusRegistry system and to educational organisations holding legacy domain names of more than four levels.

auDA and eDAC are working cooperatively to map a process for introducing the changes across the education and training sector.

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<sup>2</sup> Policies available at [www.domainname.edu.au/registrar/policy](http://www.domainname.edu.au/registrar/policy)

<sup>3</sup> Policies for .au are consistent with and subordinate to policies governing the global ICANN framework.

<sup>4</sup> *education.au limited* is Australia's ICT agency for education and training established in 1996 as a not-for-profit company owned by the Australian Education and Training Ministers. [www.educationau.edu.au](http://www.educationau.edu.au)

<sup>5</sup> <http://www.ausregistry.com.au/>

## RESPONSES TO SPECIFIC QUESTIONS RAISED IN THE DISCUSSION PAPER

The following responses are provided by AICTEC in relation to the impact of the administration, structure, governance and operations of the .au internet domain on the .edu.au 2LD.

### ADMINISTRATIVE STRUCTURE OF .AU

*3a In the broadest context, is the 'domain operator / registry / registrar / reseller model the most appropriate for .au, delivering the most efficient and effective administrative structures? – If not, what structural changes could provide greater efficiencies?*

In April 2006 AICTEC gave in-principle support for the implementation of a new level in the DNS structure, akin to the domain name resellers that exist in other 2LDs, or to the domain name authorities that manage the gov.au closed 2LD, and entitled domain name managers.

Under the proposed new structure, Domain Name Managers will be appointed under formal agreement with the Registrar *education.au limited*.

It is proposed that organisations may apply to the .edu.au Registrar to act as Domain Name Managers (Resellers) with responsibility for administering .edu.au domain 'clusters' under formal arrangements with the Registrar for the .edu.au domain. Domain Name Managers will be appointed by the Registrar, subject to endorsement by the .edu.au Domain Administration Committee (eDAC) under new policy rules covering the appointment, function and operations of Domain Name Managers.

The policy to appoint Domain Managers in the .edu.au 2LD will be subject to further consultation with the education and training sector.

*3b Does auDA's current operational and Board structure support appropriate and representative administration of the .au ccTLD? – If not, what changes could deliver more effective administration?*

Consideration should be given to extending the current membership classes of the auDA Board to provide for representation by the closed 2LDs - .gov.au; .edu.au; and .csiro.au.

*3d Do you believe the governance structures for the .au domain deliver the best outcomes to the Australian Internet community, balancing the need for a reliable regulatory regime operating in the public interest with the need to facilitate competition and growth in .au?*

auDA has classified .edu.au as a "closed" 2LD, because it is used by a defined community of interest, that is, for educational bodies registered at federal or state level, and because the 2LD is largely regulated by the relevant peak body in the Australian education and training sector responsible for administering policy and providing registration services.

The current governance structures for the .au domain effectively protect the .edu.au domain from exploitation by unscrupulous operators who might otherwise undermine the stability and integrity of the .edu.au domain by arbitrarily issuing .edu.au domain name licences to organisations and individuals who are not eligible for a licence under current policy rules.

The approach to closed domains by auDA has provided the education and training sector with the flexibility to develop policies specific to the .edu.au domain where required whilst adopting the overarching auDA framework.

There are a number of distinct advantages to the education and training sector in retaining the status of .edu.au as a closed domain. These include the maintenance of the integrity of edu.au and simple dispute resolution processes because well defined eligibility criteria must be satisfied for the registration of a domain name in .edu.au. This application of eligibility criteria is in contrast with simply a declaration of a bona fide intention to use the domain name for the purpose of education and training which would be the case if edu.au was an "open" domain.

*3e Is a not-for-profit industry self-regulatory model the most appropriate governance structure for the .au domain?*

The current model upholds the underlying principles formally articulated by Education and Training Ministers in their support for maintaining .edu.au as a closed domain:

- The Domain is to operate in the public interest and for the benefit of Australian education and training as a whole - not for commercial profit.
- Costs will be kept to a minimum with the registration fees set at a more moderate rate than those set in the commercial domains.

Through AICTEC, the education and training sector is able to set its own licence fees in line with these imperatives. Any move to a commercial model would jeopardise the low fees which are currently paid for .edu.au licences and potentially undermine the stability of the .edu.au domain.

*3i Are current processes and procedures for the operation of .au sufficiently open and transparent and do they provide for timely, relevant outputs? – If not, what operational changes could help improve openness and transparency?*

AICTEC maintains an open dialogue and effective working relationship with auDA and has actively participated in the auDA consultation process through involvement on working groups such as the auDA Names Advisory Panel and Competition Advisory Panel.

AICTEC considers that through participation in the working groups and through providing formal submissions to reviews and panels it been largely successful in ensuring that auDA takes into account the particular characteristics and circumstances of the .edu.au domain.

AICTEC would be desirous of these arrangements continuing to the extent that auDA formally invites AICTEC to participate through active representation in future working groups.

*3k The Australian Internet community to whom auDA is responsible, is a broad, all-encompassing concept. Who are the key stakeholders auDA should endeavour to engage and collaborate with in order to deliver the best, most relevant and representatives outcomes to the community?*

The Australian Information and Communications Technology in Education Committee (AICTEC) is a cross-sectoral, national committee responsible for providing advice to all Australian Ministers of Education and Training on the economic and effective utilisation of online technologies in Australian education and training. The Committee has been endorsed by Ministers as the national forum for advice on issues relating to the educational use of information and communications technology.

AICTEC is recognised by auDA as the body responsible for the management and administration of the .edu.au domain.

With representation from the schools, vocational education and training and higher education sectors, AICTEC includes both public and private education and training sector interests. Through its broad membership, the Committee represents the combined interests of each State and Territory school and vocational education and training system, the non-government school sector, higher education (through the Australian Vice-Chancellors' Committee), and the Commonwealth Government.

In choosing to liaise with AICTEC, auDA can be assured that it is:

- a) using the best available mechanism for consulting with the Australian Education and Training sector over domain name issues, and
- b) benefiting from well-established and proven avenues for consulting and gaining broad cross-sectoral input on policies relating to the management and administration of the .edu.au domain.

*3m Are there general comments or observations you would like to make regarding the security and stability of the domain name system in Australia?*

AICTEC recognises that the .au domain needs to be stable, robust, dynamic and flexible in order to accommodate the business needs of institutions operating within the education and training sector and utilising the .edu.au domain.

Ongoing business changes and reforms, combined with the increasing commercialisation and corporatisation of government businesses and organisations providing education and training services have resulted in massive changes to business drivers, organisational structures and orientations. Government departments

are increasingly outsourcing core services such as content repository and web maintenance services to private Internet service providers and IT companies.

Information technology support systems and organisational business models are evolving rapidly. As an example, the current naming system for the .edu.au domain is hierarchical in its structure and was designed to support very different systems and business arrangements than are currently operating in the education and training sector. Changes to legacy systems operating in the education and training sector will take time to implement.

auDA policies and procedures must recognise the need for flexibility as new policies and systems supporting the transition of the .edu.au domain from a pioneering model to a new standards based model are put into effect.

AICTEC maintains the view that it is important to separate policy development and management of the day-to-day operations and managements of application and renewal process for domain names.

## DNS STRUCTURE IN .AU

*4a Do you believe auDA's management of the current naming structure for .au has delivered maximum benefit to Australian Internet users?*

*4c What do you believe would be the benefits and drawbacks of introducing registrations directly at the top level – e.g. [www.dcita.au](http://www.dcita.au)? Similarly, what do you believe would be the benefits and drawbacks of introducing more 2LDs?*

To date, auDA's evaluation process and selection criteria for new 2LDs has been acceptable to AICTEC in that it has provided avenues for comment and input by the education and training sector in relation to any proposals to introduce new 2LDs.

**However, AICTEC reserves the right to oppose the introduction of new 2LDs that are deemed to have a negative impact on the overall stability and integrity of the .edu.au domain or are considered to be in direct contravention of .edu.au naming policies or policies in relation to use of words on a Reserved List.**

As an example, the use of the word “university” is protected under State and Commonwealth legislation and as a subsequence, use of the word “university” as a 2LD would not be acceptable without due consideration and approval by AICTEC and the Australian Vice-Chancellors' Committee.

The introduction of new 2LDs using terminology that is considered to be “owned” by the Australian Education and Training sector (such as [www.training.au](http://www.training.au) or [www.schools.au](http://www.schools.au) as examples) would need exhaustive and detailed consideration by AICTEC with any decisions based upon the level of consensus among all education and training stakeholders.

### **Current Naming Conventions**

At lower levels, it is recognised that current naming conventions are largely a carryover from the time before arrangements for managing .edu.au were formalised.

The .au policy needs to be sufficiently flexible to meet the demand for domain names to support dynamic business environments in the education and training sector.

auDA has acknowledged that the current .edu.au four level naming system lacks flexibility. This is because it needs to accommodate a wide range of educational sectors and interests, as well as incorporating geographical and systemic indicators.

As far as possible, naming conventions should not impede education and training organisations from achieving their business objectives. This indicates that different rules may be necessary for each sector (schools, vocational education and training, and higher education) to support the different business drivers.

As an example, many entities in the .edu.au 2LD are and will remain State-based. However, it is likely that there will be increasing numbers of registrants for whom a State/Territory designator will not work well, given a trend toward the establishment of virtual organisations and education delivery that is national and global in scope.

AICTEC will be undertaking further investigation of the implications and effect on the .edu.au domain of moving to a four-level name system, following clear principles of domain name construction. This will involve an assessment of the feasibility, policy implications and cost of changes to both the AusRegistry system and to educational organisations holding legacy domain names of more than four levels.

AICTEC has considered various models in which greater flexibility can be achieved in the Australian system and will be undertaking further consultation with the education and training sector occur around the creation of alternative third level designators (also referred to as 'childzones').

## **POLICY DEVELOPMENT AND ENFORCEMENT**

*5a Are auDA's mechanisms for policy development appropriate, taking into account the requirements and input of internet stakeholders?*

*5b Is the policy development process sufficiently flexible to respond to both the changing Internet environment and dynamic needs of the Internet community? – If not, in what way could these policy mechanisms be improved?*

AICTEC has lodged formal submissions and responses on behalf of the Education and Training sector to a number of reviews and advisory panels. These include:

- Changes to Domain Name Eligibility and Allocation Policies in the .au Second Level Domains Public Consultation Report
- auDA Competition Model Advisory Panel – Stage 3 Report for Public Consultation
- auDA Competition Model Advisory Panel – Final Public Consultation Report
- .au Dispute Resolution Policy (auDRP).

This provides an effective mechanism for presenting the requirements and demands of the Australian Education and Training sector.

**The process would be significantly enhanced however by allowing more time for responses to the reviews and workings of advisory panels, committees and working groups.**

The close-off dates are often too restrictive to allow for broad consultation on the issues with constituents dispersed throughout the education and training sector. AICTEC represents the internet domain interests of a number of stakeholder groups such as the Australian Vice-Chancellors' Committee; the Flexible Learning Advisory Group; the MCEETYA ICT in Schools Taskforce, *education.au limited*; the Curriculum Corporation; and State and Territory education and training jurisdictions.

Each of these groups represents a significant user group in its own right and sufficient time is needed to permit consultation to occur across and within the various constituencies in order for input to be validated and representative.

Many of the policy reviews do not have a significant impact on the .edu.au 2LD, but the sector would like the opportunity to provide input to those policy reviews that relate directly or indirectly to the domain.

auDA policies which apply directly to the .edu.au 2LD include:

- a. Policy 2002-14: Registrant Contact Information Policy
- b. Policy 2002-22: .au Dispute Resolution Policy (auDRP)
- c. Policy 2002-23: Approval Process for auDRP Providers
- d. Policy 2002-24: Clarification of Domain Name Licence - Prohibition on Sale of Domain Name by Registrant
- e. Policy 2003-01: .au Dispute Resolution Policy (auDRP) - Clarification of Registrar Obligations
- f. Policy 2003-08: WHOIS Policy
- g. Policy 2004-02: Application of auDA Published Policies to the .edu.au 2LD

## DISPUTE RESOLUTION

*6d Are the current mechanisms for dispute resolution efficient and effective? – If not, what alternative measures could be implemented?*

AICTEC's jurisdiction to handle disputes is limited to matters relating to the allocation and management of a domain name in the .edu.au 2LD. This includes complaints about:

- the registration of a domain name;
- the renewal of a domain name;
- the delegation/redelegation of a domain name;

- the actions or inactions of a Domain Name Manager in relation to an application for an .edu.au domain name or a renewal of a .edu.au domain name licence;
- the transfer of a domain name licence to another registrant; and
- possible breaches of .edu.au Published Policy.

Complaints made by registrants and others are handled through a three-tier process culminating in referral of the complaint to auDA under auDA's Dispute Resolution Policy (auDRP) (Policy No. 2002-22)<sup>6</sup>.

Since management of the .edu.au domain was taken over by AICTEC in 2001 there have been no complaints submitted to auDA in relation to the operations or management of the .edu.au 2LD.

## PRICING EFFICIENCY

- 6e *Given auDA's policy oversight responsibility, operational expenses and ongoing commitment to reducing wholesale domain name costs as efficiencies are realised, do you believe the current structure delivers maximum pricing efficiency to Australian Internet users? – If not, what changes could be considered?*
- 6f *Given auDA's functions and related operational expenses, do you consider that the current \$4.95 auDA domain name fee is appropriate?*

In December 2003, *education.au limited* (the Registrar for the .edu.au 2LD) undertook a review of the .edu.au domain space, which analysed the costs of maintaining the domain space and compared cost-recovery user charges with those from other domains. Based on this review, AICTEC decided that from May 2004 registrants would be required to pay a fee estimated to be \$100 (plus GST) to register a domain name in the .edu.au domain for two years, or to renew an existing licence for two years, under the terms and conditions of the .edu.au domain policy documentation.

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<sup>6</sup> The purpose of the [auDA Dispute Resolution Policy \(auDRP\) \(Policy No. 2002-22\)](#) is to provide inexpensive, speedy resolution of disputes between the registrant of a domain name and a party with allegedly competing rights in the domain name.

1. auDA has extended the auDRP to cover the *.edu.au* domain.
2. The existing auDA-approved Dispute Resolution Providers will deal with *.edu.au* disputes in the same way that they deal with open 2LD disputes.

This is considered to be competitive with licence fees charged by Registrars for the open 2LDs. The cost of an .edu.au domain name is the subject of a current review into the overall cost of running the 2LD.

In addition to the fixed and variable costs incurred by the Registrar and the eDAC Policy Secretariat, there are a number of annual charges to be met by the .edu.au 2LD.

These include:

- The annual up-front contribution payable to auDA towards the maintenance of the top level national domain, i.e. .au;
- An annual up-front fee payable by the Registrar to auDA for accreditation;
- Fees payable to AusRegistry per domain name (currently \$11.00/domain name).

The fee payable to auDA on behalf of education and training sector users of the domain will also be reviewed as part of the overall review of fees and charges for the .edu.au domain. Given that the fees paid to AuDA have been reduced in the open domain names, then consideration may be given to reducing the negotiated upfront fixed fee paid by the education and training sector to auDA.

## DOMAIN NAME ELIGIBILITY AND ALLOCATION

- 6h *Are the current mechanisms for the development of eligibility and allocation rules for the .au domain appropriate, responsive and open to input from stakeholders?*
- 6i *Is there any evidence that current policies restrict business opportunities for stakeholders in the domain name marketplace? – Is this restriction positive or negative?*

.edu.au domain name licences may only be issued to recognised Australian education and training entities as specified in the policy governing eligibility and allocation of a domain name in the .edu.au 2LD (Policy 2: .edu.au Eligibility Policy).

Licences are issued on a 'first come-first served' basis according to naming rules and after checking for conformity with policy and naming conventions for the .edu.au domain.

## EDUCATION AND AWARENESS

- 6n *Is there a need for increasing the general community's awareness of the mechanisms that operate in the administration of .au?*
- 6p *Given that registrars and resellers are the primary point of contact for consumers, are their advertising campaigns sufficient in promoting .au?*

As a closed domain, the .edu.au 2LD has not been exposed or open to advertising and sale promotions by the Registrar or others. There would however be merit in promoting the value of an .au domain name and / or an .edu.au domain name for the purpose of informing current and potential licence holders of the benefits of holding .au and .edu domain names, and their rights and obligations as registrants.

The Registrar for the .edu.au domain maintains a website that provides information on policies and application procedures. ([www.domainname.edu.au](http://www.domainname.edu.au))

AICTEC accepts that promoting awareness of the domain names system and the rules associated with its operation is critical to the stability and maintenance of the .edu.au and .au spaces.

## EMERGING TECHNICAL ISSUES

An issue of particular relevance to the .edu.au closed domain is the incapacity of the national registry to handle data on registrations below the fourth level level (eg *anyname.anysystem.anystate.edu.au*). Within the education and training sector, this is largely a carryover from the time before arrangements for managing *.edu.au* were formalised. As examples, State schools in NSW that are registered at the fifth level cannot be queried on the WHOIS service. Similarly, the WHOIS service cannot query many 4LD registrations. This means that many domain names are not visible through the WHOIS service (eg [www.ttp.uq.edu.au](http://www.ttp.uq.edu.au)).

AusRegistry is responsible for 2<sup>nd</sup> level domain names in the *.au* domain and the software that it uses has been designed and built to cater for this. It is structured to store information about 3<sup>rd</sup> level domain names. However, the *edu.au* domain has a number of third level domains (*qld.edu.au, nsw.edu.au, vic.edu.au, tas.edu.au, sa.edu.au, wa.edu.au, nt.edu.au, act.edu.au*), which means that AusRegistry has to store information about 4<sup>th</sup> level domain names (eg *anyschool.vic.edu.au*).

There are existing domains as noted above that do not conform to this and result in fifth level domains (eg *anyschool.anydiocese.catholic.edu.au*). These domains (which are not just restricted to the *catholic.edu.au* sub-domain) are problematic for the Registry and also auDA which has overall responsibility for the *.au* domain.

Various options are currently being considered to resolve this difficulty.

eDAC Policy Secretariat

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