

.au Review Discussion Paper Submissions  
Department of Communications, Information Technology and the Arts  
GPO Box 2154  
CANBERRA ACT 2601

28 November 2006

To whom it may concern,

**NetRegistry submission to DCITA in response to the auDA Review**

NetRegistry is Australia's second largest domain name registrar. We have been operating continuously since 1997. I personally have been involved in the development of the .AU regulatory environment from the .au Working Group set up by NOIE in 1999 and as a founding Board Member of auDA, and I subsequently served another term as a supply Board Member in 2004/5.

NetRegistry has benefited more than any other company from the deregulation of .AU. If there was ever a company that would be a natural ally of and friend to auDA it would be NetRegistry.

However, through my company dealing with auDA, its policies, procedures and practices and through my personal involvement on the auDA Board, and NetRegistry GM Brett Fenton's current Board seat, we have become steadily disillusioned with auDA's direction, leadership and practices.

auDA today does not command the respect of the industry it regulates. Over the years the industry has suffered many frustrations in dealing with an obtuse bureaucracy that is not focused on rational, sensible outcomes. Of particular concern is the perception amongst the Industry that Registrar requests are not accorded appropriate weight and our input appears to be devalued by a perception that we are simply and only motivated by corporate greed.

I believe in addition that the regulator has disrupted the market

The market should be left to value domain names on its own without this sort of distorting anomaly.

Another concern is the formation of the auDA Foundation which I believe falls outside auDA's principal objectives and aucd which I view as a pet social project of dubious merit.

As a result of this mismanagement, .AU has one of the lowest penetrations of comparable countries, the ratio of .com.au to .com registrations to Australian companies is a national disgrace, and auDA remains focused on spending its surpluses to improve its profile

internationally with scant regard for needed reform that the industry has been long requesting.

This is now a political organisation usurping domain name revenue streams to further an essentially ISOC agenda, directed by a Board that appears obsessed with empire building as a means to that end.

There is no industry self regulation. It is a myth. What we have is far, far different and is not, in NetRegistry's opinion, operating in the interests of the Australian Internet community.

I would welcome the opportunity to present this case directly to the minister (or her appointed agents/advisors in this matter) in conjunction with as many of my Registrar colleagues as can be accommodated.

We would welcome Commonwealth intervention to address the fundamental reform needed at auDA to support rather than retard a creative, competitive industry supporting the development of entrepreneurial talent which is itself an expression of the dynamism that exists in the Australian economy and workforce.

.au should be a global brand in a globalising economy that is widely regarded for the quality of its members (i.e.: businesses owning .au domain names), rather than the profile and claims of best practice of its domain administrator. In fact, the over regulation and red tape, whilst enhancing the regulators claims to have their finger on the pulse, in fact retards the stakeholders in whose name they regulate.

I have much hope for this review. Please do not let us down.

Yours sincerely,

Larry Bloch  
CEO, NetRegistry Pty Ltd

**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?**

NetRegistry believes that the Registry is a relatively simple technical function and should be run from within auDA. Currently the Registry is the most profitable part of the industry. There are limited costs involved in running the registry, and the current Registry contract arrangements result in what we consider to be excessive profits for the registry operator. Moreover, the tender process resulted in a single compliant tender submitted, despite the high returns for a Registry operator. This lack of competition resulting from the tender process is a grave concern. As a result, the tender process lead to widespread suspicion that the outcome was never in doubt.

We believe the registry could be run within auDA at minimal cost significantly reducing the end user domain name price, thereby stimulating demand.

**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?**

By and large, domain names are sold by registrars and resellers to businesses. NetRegistry believes that businesses, not consumers are the real demand side of the equation. auDA’s board structure gives no direct representation to business – and in particular small businesses. The current board structure has been improved, but unfortunately there remains an over focus on individual internet users as the true users of domain names, rather than the business that actually use domains. This leads to an dramatically anti-business and anti-registrar bias at the board level.

**3c Noting auDA.s not-for-profit nature, are subsidiary trusts such as the auDA Foundation and auCD the most appropriate mechanisms by which to manage and distribute significant revenue streams?**

No. In fact, the significant revenue stream used for aucd was in fact developed for that sole purpose. auDA decided to fund aucd in this way, and as a result fleeced domain name buyers wanting to obtain geographics in the existing 2LDs that had been unreasonably restricted until then. auDA’s interference in the market in this way distorted demand, resulting in an underutilisation of the existing opportunity for the use of geographics in .com.au (which in many cases have real business models that work and satisfy market demand) in favour of a clearly unworkable, pet project. auDA effectively highly taxed businesses

interested in a product with real demand to fund a useless and unneeded 'public works' type project that is doomed to irrelevancy.

We believe that the The auDA Foundation clearly sits outside the objectives set in the auDA Constitution. auDA's objectives are clearly around domain names and the domain name system, where the auDA Foundation can fund projects that have absolutely nothing to do with domain names. Whilst the auDA Foundation's charter may have merit, it is not the proper use of money paid to auDA by domain name buyers and is more in keeping with an ISOC agenda which is not auDA's role.

**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? If not, what governance structures could be adopted to deliver a better service to the Australian community?**

The governance structures adopted by auDA severely restrict growth in .AU and actively drive Australian domain name buyers towards .com and other non-Australian name spaces. Lack of meaningful representation by industry and their customers has resulted in a n inability of auDA to respond adequately to the needs of the industry. The result is inflexible and stifling regulatory policy, an over focus by the auDA executive on orthogonal activities such as aucd, international travel and participation on international panels, whilst basic industry requirements such as access to ASIC for automatic checking of registration details remains a universally called for requirement to which auDA has simply done next to nothing in 4 ½ years to its shame.

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

Yes. Unfortunately we do not have the industry self-regulatory side of the question. NetRegistry believes auDA should be changed into an industry selfregulatory body. It is not.

**3f Do auDA.s principal purposes and activities, as codified in the auDA Constitution, fully reflect the needs of the Australian Internet community, and position auDA to best deliver on these needs?.**

Yes.

### **3g How effective has auDA been in achieving these principle purposes?**

In participating in the development of the auDA Constitution, I suggested a clause be inserted into the principal purposes that requires auDA to be cost effective in its administration. This has manifestly not been upheld. Both the auDA Foundation and aucd break this objective, as does excessive travel, levels of executive pay, the lack of competition in the Registry tender process resulting in overly high registry fees and profit.

### **3h Does the role defined for auDA reflect the expectations Internet users have for the manager of a ccTLD?**

Internet users have little general expectation of auDA, nor a need to have any. Internet users expect domain names and the domain name system to work, which happens to the extent that industry knows what it is doing. However, auDA has failed the expectation of the sections of society that actually consume and use domain names by failing to remove unnecessary red tape and by failing to make .AU competitive with the ccTLD of equivalent economies.

auDA's inability to meet the innovative and creative dynamism of the internet economy retards Australia's eCommerce development by maintaining artificially high barriers to participation by that vital community, young entrepreneurs who have an idea.

ccTLD domain name penetration in Australia is significantly behind countries such as Germany and the UK which have deregulated. We have an over reliance on .com. My belief is that this has a measurable negative impact on the vibrancy of the lowest level and most important part of this new economy – kids with a dream.

### **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?**

The panel system for developing policy is a joke. It frequently delivers results that even the auDA executive acknowledge is simply incorrect. auDA is beholden to this system which removes an opportunity for rational policy development by giving sway to career panellists and activists whose greater time and ability to push an ideological agenda inhibits solid, practical, reasonable policy outcomes.

I believe auDA should be free to make policy decisions based on its unique position with an overriding process allowing for community comment as a last step. Policy change requirements should be driven by those to whom it makes a difference – Registrars and the customers they serve. If such policy change requests are inappropriate, the auDA executive can make a call in the first instance or respond to community challenges via the existing public consultation process.

We do not have industry self regulation. It is a myth. What we have is overregulation and red tape; with industry sidelined and marginalised despite industry's clear need to serve the needs of customers. By and large, the industry side of the equation has over the years suggested many, many sensible and needed changes.

I would gauge the industry's perception of auDA to be anti-business and anti-profits.

**3j Is the current role of the Australian Government in the administration of .au appropriate e.g. acting as an observer on the auDA board and holding reserve powers under legislation? Alternatively, what role would you like to see the Australian Government assume in relation to .au?**

The Australian Government has all but totally abandoned this part of the Australian community. The observer serves as little more than an official rubber stamp for a tax and spend organisation whose cash flows are artificially enhanced to support empire building per projects against the advice and desire of the community that funds it.

**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 representative outcomes to the community?**

Registrars, resellers and other internet related businesses that supply domain names.

Business – predominately small business who make up the vast majority of domain name buyers.

Non-domain buying individuals are not stake holders in a meaningful sense, but their perspective should nonetheless be considered and protected by auDA. This does not require individuals to have a majority board representation as has effectively been the case for the last 4 ½ years.

### **3l Are there better mechanisms by which stakeholder input could be sought?**

I would like to see a more vibrant online community developed in this area – forums, chat rooms, blogs.

Most relevantly, auDA should conduct online polls to inform itself of real community sentiment, rather than relying solely on the narrow, self interested participants to public consultation and panel activities (here I include entities like NetRegistry).

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

There have been significant issues that have been inadequately addressed resulting in massive disruption to Registrar operations. Currently, things have improved and remain satisfactory.

### **4a Do you believe auDA.s management of the current naming structure for .au has delivered maximum benefit to Australian Internet users? .Please provide reasons for your comments.**

Business – and particularly small business – suffers from red tape. auDA is full of it. auDA should manage .au to reduce red tape, improve efficiency, stimulate demand for .au versus .com, which it does not.

There is no place in this dynamic industry for an old Labor, tax and spend entity that is ideologically driven by a sense that business is out to rip off poor consumers.

Nor should auDA be funding a social agenda without explicit objectives to do so. auDA has taken millions of dollars from domain name buyers, distorting markets in the process to fund aucd and the auDA Foundation for very little benefit to Australian's if any.

### **4b Is auDA.s process for introducing new 2LDs appropriate? .Please provide reasons for your comments.**

2LDs are irrelevant. Nobody really wants them. Australia is better off selecting a single space (.au) and allowing all legitimate entities to register whatever they like, subject to the law of the land.

It is not the role of a domain name administrator to protect the rights of one entity against the use of a domain name by another, except in a small number of clearly identified circumstances – cybersquatting, typo squatting, bad faith registrations etc. Beyond these, the courts rightly hold sway.

**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)?**

This is a vital requirement. We are in a globalising economy and Australia is a brand in that economy – nothing more. All Australian businesses should identify themselves within that brand first and foremost. The strength of the brand is enhanced by simplicity, recognisability, and universality. netregistry.au improves on netregistry.com.au and enhances the Australian .au brand.

Having Australian companies trade internationally using .com is a disgrace and auDA should focus on ensuring this happens as little as possible. All Australian business can be enhanced by standing together in a single name space and proudly showing the world that the .au brand means something – not because it has arbitrary restrictions placed on it, but because the entities you encounter under .au – as an expression of the Australian community – hold values that are widely admired and that those entities operate in a manner than overall enhances the Australian brand.

I believe that Australian businesses have the qualities to demonstrate this. We don't need to be mollycoddled and protected in .au from invisible evils, we need to be supported and encouraged to display our Australianess openly and universally.

Opening .au to all comers allows all Australian businesses to be champions of a global brand – Australia. .AU. We all benefit from that.

**4d Similarly, what do you believe would be the benefits and drawbacks of introducing more 2LDs?**

There is currently no demand for any more 2LDs.

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

auDA policy development is currently captured by ideological attitudes that are largely anti profit and anti-business.

Policy presumes that a domain name buyer is first and foremost likely to exploit the mythical man in the street and therefore needs to jump through hoops to obtain a name. This offers that man in the street no protection whatsoever, as crooks are crooks and will use the system regardless.

Policy development should be driven first and foremost by demand, with appropriateness and sanity checked by the auDA executive and a public consultation process.

Current stakeholders are under represented (supply) or not represented at all (business). All supply input is filtered through a bias that discounts any suggestion that may improve our businesses bottom line, despite the clear evidence that profitable businesses are so because they serve their customers well.

By and large, most input from Registrars is in response to issues with supply that affect both registrars and their customers. Demand for change arises because we want to give our customers what they express they need and we want to do so efficiently and effectively. Discounting such requirements for change on antiprofit grounds is irresponsible.

**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 ways could these policy mechanisms be improved?**

No. Policy is all but stagnant. Small changes have been made over the last 4 years, but overall we still have the same policy framework inherited from Robert Elz, of Melbourne University.

The panel structure should be scrapped, auDA should canvas for policy change demand required and the auDA executive should identify which ones of these best serve their charter and then consult with stakeholders to formulate a policy change document which can then be put out for public consultation.

If stakeholders demand policy change, for this process to be dynamic, such demands should at the very least be listened to, considered, and taken on board if needed. Currently such demand is met with the usual response of “Oh, we can’t do anything about that – it has to go to the names panel, which sits again in a years time” by which time we’ve given up and moved on.

**5c As with the policy development process, are these mechanisms appropriate, taking into account the changing Internet environment and needs of stakeholders? .If not, in what ways could these policy mechanisms be improved?**

See previous answer.

**5d Should all auDA policies have formal review periods?**

Yes.

**5e Are the current policy enforcement mechanisms appropriate, and are they consistently enforced?**

Policy is only enforced in the breach. Enforcement is a complaints driven process which may be adequate.

**6a Have measures to introduce competition in the .au space been successful?**

There is healthy competition amongst registrars and resellers. The Registry tender process which was widely seen as rigged is the single area in which competition is lacking.

The Registry tender contract is worth tens of millions of dollars over 4 years (I estimate AusRegistry will gross close to \$25m over 4 years from .au. It costs between \$2m and \$3m per year to run the registry – a profit of \$13m to \$19m over 4 years for a private monopoly). It has very little risk, the revenue and income streams are understood to be stable and reliable.

The technical service provided is relatively simple – certainly within the capabilities of many, many Australian organisations. The winning tenderer has only 20 customers and the transactional relationship is fully automated.

This highly lucrative opportunity (\$13m to \$19m PROFIT over 4 years) attracted only one compliant tender, despite strong initial interest from at least two international (Verisign, Neulevel) and two other domestic players that I am aware of.

Why?

**6b Does the current structure ensure a competitive market and the best value for consumers? .If not, what further mechanisms could be introduced to increase competition?**

Restrictive policy suppresses demand and increases the cost of supply. Poorly managed, uncompetitive registry tender processes increase the cost of supply.

Failure of the auDA executive to address operational inadequacies that limit registrars ability to process applications automatically (ASIC access) increase the cost of supply.

Taxing domain name buyers, distorting markets by manipulating end user pricing (Geographic's and Generics), using surpluses to fund pet social projects rather than returning surpluses to end users through reduced pricing increase the cost of supply.

All these factors result in our current situation of overly low .au penetration, overly high reliance on .com, overpriced .au names, none of which is ideal for consumers.

Another area that restricts competition is in transfer policy. A reseller or agent for a number of domain name owners is not free to select a supplier. In doing so, the names he administers can only be moved to a new supplier with the explicit consent of each and every customer for each and every name. This is hugely inefficient, does not benefit the customer and reduces competition, increases costs and makes no sense. Policy should allow a domain name owner to delegate authority to an agent for the selection of supplier.

**6c Are the rights of domain name consumers sufficiently protected by current mechanisms? .If not, what further measures could be taken?**

The close and substantial criteria is a waste of time and is not vetted by registrars – there is no way for us to. A “no bad faith” requirement that has been suggested as part of the terms rather than an explicit warrant may well protect domain consumers better.

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

AUDRP is appropriate and coincides with international best practice. The gap in protection is in legislation and enforcement by the states and commonwealth, not within auDA policy, procedures or mechanisms.

**6e Given auDA.s policy oversight responsibilities and 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?**

This has been answered in a question above. However, I will say that having sat on the auDA Board, it did not appear to me that there was an ongoing commitment to reducing wholesale domain name costs. It required a considerable fight to get auDA to agree to reduce its domain name fee the first time, and despite pushing to establish a formal structure to ensure further reductions kick in (which hasn't happened in a formal sense. In general, the approach has been to guard surpluses and maintain (to me at least) excessively high contingency funds at the expense of an appropriate reduction in domain name fees.

**6f Given auDA.s functions and related operational expenses, do you consider that the current \$4.95 auDA domain name fee is appropriate?**

No. It is reflective of an organisation committed to spending surpluses and is excessive. Take a look at the auDA budget.

**6g Following the introduction of competition to the .au space, do you consider that the average retail fee of .au domain names is appropriate?**

The market has set a range of prices that appear to be a healthy spread based on the input pricing to Registrars. The range is nonetheless artificially high for cost issues elsewhere in the hierarchy (auDA and AusRegistry).

**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?**

No. Real stakeholders have no need or desire for the eligibility or allocation rules. They serve no purpose. Businesses comply with this unnecessary red tape because they have to and being small business they don't overly complain. This red tape prevents the smooth and efficient operation of this market – and in particular prevents business models based on the real time supply of domain names (as names must be manually checked before being registered).

**6i Is there any evidence that current policies restrict business opportunities for stakeholders in the domain name marketplace? .Is this restriction positive, or negative?**

Current policy restricts business opportunities in a number of key areas:

After Market: The domain name after market may be larger than the primary market globally. auDA's nonsensical restriction on the resale of .au domain names is another ideologically driven outcome that flies in the face of reality. The prohibition distorts the market by preventing a resource to flow naturally to the entity that values it most.

Real time domain registration: The requirement for eligibility and allocation policy to be fulfilled means names must be manually checked which in turn means that a domain name transaction cannot be completed whilst the purchaser is online. This results in a restriction on business models that rely on real time supply.

Delegated authority for the selection of Registrar supplier: Transfer policy prevents an agent from controlling the supplier for their customer's domain names. This results in inefficiencies as resellers must maintain relationships with multiple registrars and cannot choose the most suitable supplier for their domain names.

Policy should allow for a domain name owner to delegate authority for their domain – at the very least in the choice of supplier. In this way, competition is enhanced because a reseller is unrestricted in their ability to secure supply.

Restrictions on domain name use: Policy that seeks to proscribe what a company may use their domain name for can restrict the development of a business model. There should be no overarching censorship applied to a domain name use by policy regulation. The close and substantial rule exerts this censorship, effectively restricting a business to use their domain for a purpose that must be and must remain a close and substantial match to their activities. This is unnecessarily restrictive as a resource should instead be free to be used in a manner that its owner feels has the most value.

### **6j Could a relaxation of these rules facilitate meaningful growth in .au, or could it lead to inappropriate name registration and hoarding practices?**

Hoarding can be controlled by a simple set of good faith requirements in domain purchase terms and conditions.

Policy should be managed not by the expectation of evils, but by the need to control expressions of these evils. The current approach is throwing the baby out with the bath water.

The price of over regulation, and the threat it presents to the dynamism and vibrancy of .au is not worth the possible benefits. In fact, I don't believe there are any benefits. Most of the benefits are touted as such on the basis of received wisdom rather than empirical fact. For example, do consumers really trust a website because it's a .au site and they know that means it has a valid business registration, or do they trust a website because they are sophisticated enough to spot a scam – in the same way they do offline. And do we want to falsely provide a sense of security to a consumer by pressing the .au line of security, when there is no evidence .au is 'safer' for consumers, when we should be enhancing a consumers natural ability to spot a scam instead.

After all, scammers can get an ABN number with little difficulty.

**6k Does the current prohibition on the resale of domain names best serve the Australian Internet community, or do the benefits of a relaxed policy regime outweigh potential impacts upon registrants and registry operators?**

There is no rational reason to prohibit an aftermarket. This prohibition is based on fear of unsavoury practices, not on the demonstration of such. It arises from the Board and the panels having an anti-business bias. Such resale markets operate transparently and without identifiable harm in many other jurisdictions. Moreover, the prohibition does not prevent unscrupulous operators from extorting money from corporates (for example by pointing a cyber squatted domain name at a porn site). What would work much better is an auDA hotline made very visible in the market with powers to suspend a name arbitrarily pending an investigation (such to be undertaken promptly with an initial ruling to either unsuspend or maintain suspension within 24 hours). Such a system would address the downside of allowing domain name resale whilst allowing a thriving market in names that need owners.

We allow resale of number plates, telephone numbers – in fact almost every other comparable licence. The prohibition in .AU is ideological, nanny stateism.

**6l Is there a need for affirmative action in facilitating and developing secondary markets, or will it occur naturally?**

There is currently a great demand for a secondary market. There are supply side participants ready to provide the service and there is a wealth of third parties willing, able and ready to participate. All that is needed is a removal of the prohibition, a sensible set of rules and the market will manage itself.

**6m If a secondary market were introduced for .au domain names, what would be the most appropriate framework through which it could be regulated?**

auDA is the most appropriate organisational framework. I would like to see auDA's powers enhanced when dealing with a name that is explicitly for sale. Such powers might include enhanced powers to suspend, delete or transfer names. Such powers would be exerted only on the basis of complaint after a rapid investigation. The requirement here is to prevent extortion for example (through pointing a name at a porn site and demanding payment) and other activities that are deemed inappropriate.

By and large, the demand is for a fair, rational, ethical and reliable market for the genuine resale of names that are worth more on the market than they are to the owner. auDA should stop seeing evil capitalist exploitative gremlins around every corner and focus on meeting the expectations, demands and requirements of its constituent stakeholders – industry and small businesses primarily.

**6n Is there a need for increasing the general community's awareness of the mechanisms that operate in the administration of au?**

There is. auDA has a brief to educate the market and does very little effective to do so. Much can be done to promote .AU above .com (in the absence to date of a regulatory environment to support that).

**6o Who should be responsible for funding awareness raising and education efforts?**

auDA in the first instance. However, if Government got to grips with the meaningfulness of the .AU brand in a global economy, I am sure it would see that supporting .au over .com was in the national interest and worth of taxpayer funded support. In this century and beyond, .au will represent Australia far more than any other single brand.

**6p Given that registrars and resellers are the primary point of contact for consumers, are their advertising campaigns sufficient in promoting .au?**

There has been some advertising that may or may not have been effective. It is difficult to promote .au when the regulatory environment works against that assertion.

**8a Given the natural synergies between the naming and numbering systems that underpin the operation of the Internet, is the current separation of functional responsibilities between numbering and naming appropriate?**

There is no case for auDA to manage numbering. These are separate aspects of the internet with very little real policy or operational crossover.

**8c With the increasing convergence between traditional communications,**

**media and information technology networks, what are the particular technical and policy challenges that will face the .au domain?**

It will be critical to ensure that policy development is responsive and flexible enough to appropriately keep in step with developments. There are no technical challenges per se, other than scaling infrastructure to meet demand. The DNS system is itself sufficiently technically scalable and robust to handle Australia's needs for the foreseeable future. After all, .com, which is the same technology, has 70 times as many names in it and operates without issue.

**8d Do these technical and structural shifts generate a need for changes to the current model for the management of the .au domain?**

We believe that once the political aspect of the process are removed the structure is appropriate for managing the operational aspects.

**8e If the current regime continues in its present form and role, what changes would you suggest to its operation or governance to make it more effective?**

Adequately answered in previous responses.

**8f Are there any other general comments you would like to make?**

Please see my cover letter.