

Domain Industry submission to DCITA au namespace review

Background

The Domain Industry Association is the peak body for representing the interests of the industry; specifically it was incorporated to represent a coherent and unified voice for registrars. Currently the body consists of the following members

- [Anchor Systems Pty Ltd](#)
- [AussieHQ Pty Ltd](#)
- [Australian Style Pty Ltd trading as Bottle Domains](#)
- [Discount Domain Name Services Pty Ltd](#)
- [Distribute.IT Pty Ltd trading as Click'n Go!](#)
- [Domain Central Pty Ltd](#)
- [Domain Directors Pty Ltd](#)
- [Enetica Pty Ltd](#)
- [Explorer Domains Pty Ltd](#)
- [IntaServe Pty Ltd](#)
- [Melbourne IT Ltd](#)
- [NetRegistry Pty Ltd](#)
- [Sublime IP Pty Ltd trading as GoDomains](#)
- [TPP Domains Pty Ltd trading as TPP Internet](#)
- [Wobygong Pty Ltd](#)

Members of the association are responsible for handling over 90% of all .au domain transactions.

28/11/2006

> 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?

We believe that the model represents the best opportunity for the best outcome for consumers. It provides opportunity for competition between registrars to yield innovation and competition on features and pricing to address market needs and demands.

> 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?

We do not believe the current board structure represents the most effective administration of the name space.

While the current board structure has been recently modified presumably in anticipation of this review, we do not believe it goes far enough towards addressing fundamental problems with the structure.

Firstly small business make up approximately 75%, and business in general make up over 90% of all domain name transactions. Yet business has no real representation on the board or policy panels. This is a fundamental structural flaw, which must be rectified.

[REDACTED]

[REDACTED]

The distinction between 'supply' and 'demand' is deeply flawed; it presumes that the interests of the industry are opposed to that of its customer base. Yet in a free market it is in the overlap between the needs of the supplier and customers, which yields the greatest rewards. It is the existence of competition, which provides the necessary balance in favour of the consumer.

[REDACTED]

[REDACTED]

We believe that industry self regulation should mean exactly that, the industry regulates itself and is based around the explicit recognition that the industry is at the coalface of customer demand and in the best position to know what customers want, and that it is competition not overreaching policy that provides the best outcomes for consumers of domain names. This recognition currently does not exist and its implicit rejection is enshrined in the current board, panel and policy structures.

We believe that once the opportunity to influence eligibility and other red tape policies ends, the distinction between supply and demand becomes meaningless. It's a distinction that exists to entrench policy.

We believe the current distinction for board and membership positions of supply or demand should be removed along with overreaching policies and replaced with open positions and independent directors with a safety valve of government observers.

> 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?

[REDACTED]

[REDACTED]

There is something not quite right when the regulator vigorously acts to ensure the public is prevent from extracting the value in a name and then engages in that behaviour itself. We believe these action are inappropriate and hypocritical and not in the spirit or expectations of auda's not for profit charter.

[REDACTED]

[REDACTED]

We believe that auda must absolutely refrain from placing itself in the position of knowingly creating large surpluses.

Auda surpluses are effectively a de-facto tax on domain names.

In particular, we believe that the auDA Foundation extends the auDA mission beyond the core intention of its objectives. Funding projects that have no bearing on domain names or the domain name system may appear to some to be worthwhile, but should not have been funded by effectively taxing domain name owners. These surpluses should be used exclusively for the core objectives of managing the .AU space, and if no worthwhile use in this line can be found, should be returned to domain name buyers through reducing the auDA fee on each domain name transaction.

> 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?

Growth and competition occur naturally with virtually no input required from auda.

From an operational point of view ausregistry does a good job of name space stability.

We do believe that the governance structure to date has dramatically restricted the growth of the name space. The penetration per capita for .au is amongst the lowest in the world for comparable countries.

The governance structure to date has enabled special interest groups to dominate the policy making and stifle free market forces.

We believe that the “demand” and related class board membership structure has to date given special interest groups a right of veto over the industry.

We do not believe auda represents any form of industry self-regulation and has to date been a case of special interest groups regulating the industry through the structure that entrenches policy.

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

Not for profit is appropriate, but we do not believe there is any industry self-regulation. If there was any form of “industry self regulation” there would not be a complex policy framework that stifles growth and creates red tape for registrars, business, individuals and other stakeholders

> 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?.

No we do not believe that it does for reasons outlined in this document.

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

We believe that auda has been effective at an operational level by outsourcing on a tender basis for the physical infrastructure but has failed to deliver at a policy level due to its policy framework, which excites activists by its existence.

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

We believe that most business are too busy running their business to take an active role in the name space and that auda should actively seek input from business representative groups, such as chambers of commerce, which it has never done.

The recent changes to the auda board structure do go some way towards redressing the imbalance between industry self regulation and special interests but fail to address the crux of the problem, which is choice stifling and cost inducing red tape.

> 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 structure while not ideal is probably the best approach, however to date it has been used very effectively to entrench policy. Panels are usually convened with a consensus vote being some super majority; thereby ensuring the few industry members granted access have never been able to make meaningful change to policy. The structure effectively grants veto to career activists.

> 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?

We believe the Australian government should restore free market dynamics by instructing auda to remove pieces of pointless red tape such as allocation and eligibility policies. We believe that retaining the government, as an observer is appropriate.

In the experience of the Supply Board members to date, the Government observer has done little to inspect the core inadequacies of auDA. We are unaware of any approach by the observer to industry to solicit feedback on the effectiveness of the auDA structure, governance, policy regime or decision-making process.

> 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?

auDA has to date placed too much emphasis on internet users who by definition encounter domain names, but do not have a direct interest in domain name policy. Insufficient attention has been given to the entities that buy and rely on domain names – businesses.

Business representative groups are well placed to represent the business community interest in domain names, but have been all but ignored by auDA, which as a result appears to us to be anti-business – both industry and their customers.

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

There are many business representative organisations auda should contact for input. Insufficient use has been made of online polls to gain feedback from core stakeholder groups.



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

We believe the security and stability is appropriate.

> 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.

Auda pigeonholes section of the community through an allocation policy taxonomy, which in our opinion does not yield any beneficial outcome beyond "looks nice".

Not all businesses have an abn or need an abn or its paperwork overhead, but a business without an abn is disenfranchised from the .au namespace by the eligibility requirement that a registrant must have an abn. People with ideas for business are likewise prohibited from registering in .au until they are actually in possession of an abn, possibly losing the name or as frequently happens simply registering under a more open name space such as .com, .biz .net etc. Some business may prefer to be registered in org.au or asn.au but again this is prohibited.

We believe that an abn should not be required to register in .au.

Individuals are shoe-horned into the .id.au name space. Despite various advertising campaigns and monetary incentives by ausregistry to boost numbers in this space, it remains unpopular. Individuals overwhelmingly choose to register in .com. Again the policy requirement that the domain must be the individuals name or nick name disenfranchises the bulk of this constituency. People prefer some degree of anonymity and often have micro business, projects, blogs, mailing lists and other activities that they want domains for.

These activity-based domains have no place in the Australian taxonomy. For example the main Australian dns mailing list is under dotau.org since it does not qualify for any position under .au

We believe that this serious problem would be fixed by removing the need for an abn and allowing individuals and business to register anywhere in .au

We believe the government should instruct auda to drop the allocation taxonomy policies and provide real choice back to the Australian population. It should be noted that many countries, such as japan, france, etc that have moved from restrictive policies have attracted vast numbers of population from .com back to their tlds.

The prohibition of foreign ownership should also be lifted. We believe at at the very least the current prohibition is possibly in breach of the free trade agreement with the USA.

New Zealand has an open name space and it has not been inundated with foreign buyers as is claimed would happen if .au was opened up.

In fact, many of the restrictive policies have been inherited as received wisdom from the regime passed to auDA by Robert Elz. These restrictions are often described as protecting .AU from the evils that beset other ccTLDs. However, it has never been demonstrated that these evils actually exist, nor that they have negative implications if they do. Moreover, ccTLDs, such as .uk, that have almost no restrictions are vibrant and fully functional. It is nonsense to imply that .uk suffers anything from not requiring a business registration for obtaining a .co.uk domain or is in anyway inferior to .au.

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

There has been no real demand for new 2LDs other then by a group of geographers. There was no significant public or industry consultation during the process of creating aucd which we do not believe was appropriate. Auda tied release of prohibited geographic .com.au domains to board acceptance of state based TLDs which we do not believe was appropriate either.

The world is watching auDA's experiment in new economy social engineering with auCD and we believe that the outcome will be repeatedly pointed to as an example of the pointlessness of trying to drive demand for a domain name structure from the top down. aucd and the community geographic name system is a wasteful exercise in regulatory vanity.

> 4c What do you believe would be the benefits and drawbacks of introducing registrations directly at the top level.e.g. www.dcita.au?

We believe there is a strong demand for opening up .au. It creates short memorable domain names that would be highly sought after by business and individuals. We believe the government should instruct auda to open up the .au name space.

We do not believe there are any disadvantages to opening direct .au registrations, the naming range is sufficiently large enough under a single level that additional levels will never be required. In the worst case auda could always buy back a name for a new tld but we don't ever foresee this being necessary.

Ultimately, in a globalised economy, Australian businesses must compete with other international businesses. There is no doubt that, all things being equal, the domain name company.au competes better with company.com or company.ca than company.com.au does.

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

We do not believe further 2lds are in demand or required and more to the point the only viable tlds currently are .com.au and .net.au. The existence of id.au is subsidised by the commercial namespace. The org.au and .asn.au spaces are generally provided at cost or below as industry goodwill.

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

We do not believe the mechanisms for policy development have been appropriate for the reason outlined above. Many of the allocation and eligibility policies should simply be scrapped or simplified removing red tape particularly for small business.

The eligibility polices create confusion and unnecessary overhead. While there is an argument that the eligibility policies add value to the .au space we believe that the only real tangible benefit of registering under .au is only one of advertising ones nationality.

> 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?

We do not believe there has been any flexibility until there was awareness of a government review.

> 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?

From an operational point of view we believe they are adequate.

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

yes.

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

We believe the policy enforcement mechanisms are as appropriate as they can be without supporting government legislation such as anti cybersquatting laws.

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

We believe that a competitive market has delivered choice, innovation and plurality of value propositions to the market under very competitive pricing.

We believe however that auda should aim for price stability to ensure a healthy industry. The industry is small and the market place has been artificially restricted as witnessed by the very high uptake of gtlds by Australians in proportion to population and cctld uptake.

Given there are only about .7m .au names and that Australians hold 1.4m gtlds we believe that if the aim of auda is to promote the .au name space over competing name spaces then the current policy regime has been a failure.

We believe that the .au space would now be about double the current size under a less restrictive policy framework.

[REDACTED]

[REDACTED] This is of course nonsense; a free market is self-adjusting in terms of rates of return. A more open market would attract more players and have a downward price pressure keeping profits to justifiable returns

[REDACTED]

> 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?

Best value is achieved by focusing on operational efficiency.

The pointless red tape of allocation policies should be removed and allocation simplified to 'good faith'

The current policy requirement that that every domain must be manually checked adds delay and cost to every transaction and prevents real time registration for no real gain and considerable competitive disadvantage. Few registrars can justify 24/7 approvals and there is real delay ranging from minutes for well-resourced registrars to sometimes days for small players.

Registrants must warrant that the information provided is as per the policy framework so there is no real need to have registrars vet eligibility criteria.

The industry is in favour of fully automated approval processes.

Criminals use other people's real company details to obtain domains under .au for the purpose of fraud or phishing. In a sense the claim that the com.au brand creates some certainty about the registrant is false and quite deceptive.

The public should not be using com.au registrations as any security criteria when assessing the bona fides of a com.au website.

ASIC access

It must be noted that auda mandates the verification of abn information through abr and asic. To date, despite 4 years of registrars asking for direct access to asic, auda has failed to deliver. Currently registrars must verify abn information through program scripts that use the web interfaces provided by abr and asic. These are not reliable and sometimes change, breaking the scripts that access them, adding layer of cost, inefficiency and registration delay.



We are in favour of mandating an abn if an entity has an abn and we are even in favour of verifying the consistency of information provided by registrants against asic databases, provided that efficiency in the system can be managed by reliable direct database access to asic and on the understanding that this in no way deters or prevents criminals from operating.

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

One of the principle consumer protection policies is the 'close and substantial' connection policy. We believe this policy should be replaced by 'good faith'.

Currently registrars are incapable of verifying any close and substantial connections yet are still required to manual vet every transaction. As such the policy in no way protects the public from any misuse.

We believe that a dispute resolution system based on 'good faith' registrations is appropriate for .au.

It is clear that 'close and substantial' artificially limits growth in com.au for no real benefits.

This policy has been entrenched because various activists consider the name space something akin to an old growth forest that must be preserved for future generations and something that must not be commercially exploited.

We beg to differ and believe the name space is there for the public to use and exploit in whatever creative application they wish subject to good faith. A name space that is not used has no value, value in domain names only arises once they are used.

It should be noted that .com has roughly 60 million names versus com.au's 700,000 names, clearly there is tremendous growth left in the name space.

It should also be noted that close and substantial has been virtually made irrelevant by monetisation. With monetisation it has become apparent that a domain name can itself be the sole justification as a basis for trade, currently only indirectly through the placement of advertisements. Unfortunately auda has chosen to base the monetisation policy on the contents of the monetised web page, which we believe, is beyond the scope of its charter.

With secondary markets a domain becomes itself the object of trade and basis of 'close and substantial' claim and again opens up more loopholes in 'close and substantial' rendering it meaningless. The secondary trade in domains then becomes the substantial basis for justifying any name. In other words someone actively trading in domain names has a valid claim to any name. We believe that replacing 'close and substantial' with 'good faith' becomes paramount.

Protection from scammers

To date the policy has not created any special condition by which auda has been able to deal with scammers. To run these operators out of town auda has resorted to use of legal action under the trades practices act. It should be noted with some irony that it is the uk registry Nominet that has succeeded in bankrupting one local operator.

The policy in itself has not made the public any safer from the bad guys. What it has had modest success against the bad guy is auda's large reserve legal fighting fund, which we believe is the real success story of auda. However now that this fund is in place we do not believe auda needs further capital accumulations.

It must be noted that despite some of the toughest regulation in the world, Australia has had one of the highest incidence of domain name scammers, principally because no auda regulation can have any teeth from the point of view of punitive sanctions or deterrence. From the point of view of scammers there is no real harm in trying schemes other than the existence of the auda legal fighting fund.

Cybersquatting

We believe the government should consider introducing cybersquatting legislation as a backup to the current dispute resolution process. It would give parties access to discovery and other legal processes and actively deter through penalty the activity of cybersquatting. It would also allow the name space to be opened up to overseas buyers providing a clear degree of confidence local firms would not be cybersquatted by overseas entities.

We believe the government should investigate the US model in this regards.

Auda uses contract law to enforce its agenda and while it can order a domain to be transferred it can take no other action against an offender nor inflict any punitive measures. There is little harm under the current regime in attempting to cybersquat.

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

We believe audrp is appropriate but should be backed up by anti cybersquatting legislation as outlined previously

> 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?

We do not believe any further efficiency can be had without a rejection of the eligibility, allocation policies and prohibition on secondary markets.

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

We believe that the auda administration fees, on top of which are layered registry fees is excessive and reflects more a need to accumulate rather than focus on the lowest cost footprint on stake holders.

An overhead of around 30% of the registry price to manage a bit of policy really needs closer investigation.

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

We believe that the appropriateness of any price is something the market determines based on the value propositions provided. It must be noted that Australians have one of the highest per capita holdings of gtlds.

We believe that the policy framework necessitates a value framework that is not necessarily competitive with other more appropriately managed name spaces. A policy framework based on what 'looks' nice (allocation taxonomies) and 'sounds' nice (eligibility policies) is not a justifiable replacement for open markets.

> 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. There is currently no possibility of free market being restored to the name space and it is the industry position is that this red tape should be removed altogether by government mandate.

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

The current eligibility policy restrict many entities with a legitimate reason to want a .au name (but without an abn) from obtaining one, resulting in a trend of support for to .com. over .au

Policies requiring manual checks on all names dramatically increase end user cost which decreases the price competitiveness of .au as well as delays in the registration process, driving name buyers to .com.

It is not possible to register a name under .au for an opportunity until you are trading with an abn, so clearly this policy alone restricts business.

It has also become apparent that 'close and substantial' policy creates some insecurity over name ownership.

Tying allocation policy to internal business operational matters can lead to situation where a business is no longer eligible for domain and an other entity can lay claim to that name, despite the time, effort and money that may have gone into building up the brand and traffic around that domain name.

We are aware of operators in the market that profit by acting in a predatory fashion in regards to business' that are no longer 'eligible' for particular names.

A 'good faith' registration policy would eliminate this practice of domain poaching.

'Close and substantial' also increases inefficiency. It creates confusion amongst business as to just what constitutes a close and substantial

connection. This creates extra support load that factors into domain costs and it creates a layer of delay.

Further the policy for some people creates the misguided view that names are 'reserved' for people by a 'close and substantial' and some are shocked to discover that 'some else' has taken 'my name'. The reality is that many entities can have a valid claim over a single name. What really frustrates and bewilders customers is that they are not permitted to offer to purchase a domain name from its current owner.

The reality is that names are issued on a first come, first keep basis with no possibility of names moving to people who have the most valuable use for them. It's a truly bizarre system that is designed from a fear and paranoia rather than anything that would deliver the best opportunities for the public.

Prohibition on auto-renewals

There is a policy where a registrar or reseller without an explicit approval of the domain name holder may not renew a domain name. This is another policy that exists to "protect" consumers.

It is clear that this policy is responsible for some active .au domain names occasionally disappearing from the Internet due to careless management of the names renewal. This has over time caught out some major websites, for example, anz bank.

Registrars and resellers argued that this policy creates real problems for registrants who for one reason or another are not on top of their renewal processes. Not only does it cause grief with websites and email disappearing but also there are occasions where registrants have lost names that are snapped up by other eligible entities.

This policy arose in the context of a code of conduct panel, where consensus was set at 2/3 majority, which effectively gave and still gives veto to the various activists on the panels. It is virtually impossible for registrars to change this policy.

It should be noted that various compromises were offered, including mandatory refunds if a domain was renewed against the wishes of registrants, but all were rejected and we now have a situation where registrants must be proactive in renewing domain names or suffer the consequences. Registrars arguing for this policy not to be put in place were accused of trying to maximise profits. As always happens any time registrars put anything forward that has any effect on the bottom line it is shot down in flames without any consideration of the value created for or impact on customers.

This policy creates overhead and frustration for the industry and for registrants.

We believe that the government should instruct auda to remove this policy.

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

We believe that inappropriate hoarding are covered by 'good faith' registration policy and the removal of prohibition on secondary markets. The holding in cctlds by Australians clearly shows this red tape does stifle growth in .au. As a base to the dispute resolution process we believe the government should consider introducing cybersquatting legislation.

It is our view that secondary markets create the most efficient allocations of names to the entities that value them the most in stark contrast to the egalitarianism and preservationalism, which currently infects the policy. We have thrown the "free market" baby out with the 'big brother' bathwater.

> 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?

We believe there is absolutely no valid basis for the prohibition on resale of names and the policy should be lifted immediately.

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

We believe secondary market do not require anything more than a removal of prohibition, eligibility and allocation policies. Eligibility should be removed and a 'good faith' policy installed. Market dynamics will rapidly address any needs of secondary markets.

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

We believe a 'good faith' policy is appropriate. Currently the 'close and substantial' framework is meaningless in the context of secondary market. Eligibility policy is not something registrants want to be or should be involved in when considering selling a name. A registrant could be held liable under a duty of care or have to refund a sale for not ensuring that a new owner of a domain is entitled to that name, which is really the last thing anyone selling a name is going to want to be concerned about. Trading names itself becomes

the claim to a name, which renders 'close and substantial' irrelevant: a trader has virtually a valid claim to any name, which is where good faith must come in.

We believe that 'close and substantial' must to be replaced by 'good faith' to facilitate secondary markets.

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

We believe auda should pro-actively seek and engage business representative groups and remove the policy framework, which excites career activists.

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

Auda.

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

We believe the low take up of .au name is a direct result of the policy framework and not something that can be rectified through advertising.

> 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?

We believe that auda is probably the appropriate body to manage the various numbering schemes as long as it is kept to a strictly technical basis.

> 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?

We believe the critical factor is removing the incentive for political policy frameworks and focusing on technical and operational frameworks.

> 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 aspects 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?

As we have outlined above, the removal of growth and free market hindering policies and proactively engaging with representative of business interests.

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

We would like to thank DCITA for this opportunity to put forward the industry viewpoint.

As a concluding remark we like to add that it is an underlying principle of the industry that auda should not interfere with the free market unless there is some demonstrable customer harm and that the policy framework should reflect that. All of what we are recommending is simple restoration of the free market principle and lifting of the heavy hand of over regulation.

We have highlighted the fact that there is significant opportunity for increasing efficiency and cutting red tape in the .au namespace and sincerely hope that our submission will act as a catalyst towards real positive change for all stakeholders.