



CSIRO IM&T

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CSIRO's Response to the Department of Communication, Information Technology and the Arts discussion paper - "Review of the structure and operation of the .au Internet domain"

The following comments have been compiled by members of the CSIRO Information Management and Technology team on behalf of the CSIRO CIO, Rozanne Frost.

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| Discussion paper section | Discussion paper question | CSIRO's comment |
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| 3.1 Au administration | 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? | The 'domain operator/registry/registrar/reseller' model is considered to be effective. |
| 3.2 auDA structure and board | 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? | auDA's current operational and Board structure support is considered to be appropriate. |
| 3.3 auDA subsidiaries | 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? | The subsidiary trust structure is considered to be appropriate. |
| 3.4 Governance structures in other ccTLDs | 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 for the .au domain are considered to be appropriate. |
| | 3.e Is a not-for-profit industry self-regulatory model the most appropriate governance structure for the .au domain? | The not-for-profit model industry self regulatory model is considered to be appropriate. |
| 3.5 auDA Constitution | 3.f 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? | auDA's principal purposes and activities are considered to be appropriate. |
| | 3g How effective has auDA been in achieving these principle purposes? | auDA has been reasonably effective in achieving these principals. The regular reviews undertaken by auDA |



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| | | have added to the effectiveness. |
| | 3h Does the role defined for auDA reflect the expectations Internet users have for the manager of a ccTLD? | Yes. |
| 3.6 Transparency and timeliness | 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 processes and procedures are considered to be reasonably open. |
| 3.7 Government role and reserve powers | 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 current role of the Australian Government in the administration of .au is considered to be appropriate. |
| 3.8 Stakeholder Participation | 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? | The key stakeholders include: <ul style="list-style-type: none"> • Companies providing products and service in Australia • Government agencies providing services in Australia • Educational institutions in Australia • Community organisations in Australia • Internet users (nearly everyone) in Australia |
| | 3l Are there better mechanisms by which stakeholder input could be sought? | The current mechanisms for stakeholder input are considered to be reasonable. |
| 3.9 Security and Stability | 3m Are there general comments or observations you would like to make regarding the security and stability of the domain name system in Australia | auDA's approach to maintaining the security and stability of the domain name system in Australia is considered to be effective. |
| 4.2 Naming Structures in other ccTLDs | 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's management of the current naming structure for .au has been effective. However, consideration should be given to registration at the top level. Refer to 4c. |
| | 4b Is auDA's process for introducing new 2LDS appropriate? —Please provide reasons for your comments. | auDA's process for introducing new 2LDS has been appropriate. However, as noted in 4a consideration should be given to registration at the top level. |



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| | 4c What do you believe would be the benefits and drawbacks of introducing registrations directly at the top level—e.g. www.dcita.au? | <p>The benefits of registration at the top level of .au domain will include</p> <ul style="list-style-type: none"> • Simpler more memorable URLs • Expansion of the .au domain giving Australian enterprises more prominence and global enterprises an intuitive way to name their Australian portals <p>The main drawback would be related to overcoming existing community familiarity with the use of 2LDS. i.e. Similar to what UK registrations experience with the use of .co.uk instead of .com.uk</p> |
| | 4d Similarly, what do you believe would be the benefits and drawbacks of introducing more 2LDs? | The introduction of more 2LDS is not considered to be an issue. |
| 5.1 Mechanisms and processes | 5a Are auDA's mechanisms for policy development appropriate, taking into account the requirements and input of internet stakeholders? | The auDA's mechanisms for policy development are considered to be appropriate. |
| | 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? | The process is considered to be sufficiently flexible. While the needs of the Internet community may change rapidly, policies proposals need discussion and should not be rushed. |
| 5.2 Policy reviews | 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? | The mechanisms for policy reviews are considered to be appropriate. |
| | 5d Should all auDA policies have formal review periods? | Yes the auDA policies should have formal review periods. |
| 5.3 Policy enforcement | 5e Are the current policy enforcement mechanisms appropriate, and are they consistently enforced? | The current policy enforcement mechanisms are considered to be appropriate and effective. |
| 6.1 Competition | 6a Have measures to introduce competition in the .au space been successful? | Yes, the measures so far have successfully reduced registration fees. |
| | 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? | Yes, but competition could be further increased by giving consideration to allowing the major global registrars to register in .au. It is understood that Germany, Japan, United Kingdom and New Zealand have taken this step. |
| 6.2 Consumer | 6c Are the rights of domain name | Yes, the rights of domain name |



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| protection | consumers sufficiently protected by current mechanisms? —If not, what further measures could be taken? | consumers are considered to sufficiently protected by current mechanisms |
| 6.3 Dispute Resolution | 6d Are the current mechanisms for dispute resolution efficient and effective? —If not, what alternative measures could be implemented? | Yes, the current mechanisms for dispute resolution are considered to be efficient and effective. |
| 6.4 Pricing efficiency | 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? | The current structure for pricing is considered to be effective. |
| | 6f Given auDA's functions and related operational expenses, do you consider that the current \$4.95 auDA domain name fee is appropriate? | The auDA structure, review process and not-for-profit principles are considered to be effective in determining the 'domain name' fee. |
| | 6g Following the introduction of competition to the .au space, do you consider that the average retail fee of .au domain names is appropriate? | Yes, the average retail fee of .au domain names is considered to be appropriate |
| 6.5 Domain 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? | The current mechanisms are considered to be appropriate. |
| | 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 eligibility requirements do impose restrictions, and enforcements add to operational costs. However, we have no evidence that these restrict business opportunities. |
| | 6j Could a relaxation of these rules facilitate meaningful growth in .au, or could it lead to inappropriate name registration and hoarding practices? | Yes, it is considered that relaxation will facilitate growth, and while it may lead to some hoarding this should not be a significant problem. |
| 6.6 Secondary markets | 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? | It is considered that relaxation on the resale of domain names may invigorate the .au domain which could benefit the Australian Internet community. |
| | 6l Is there a need for affirmative action in facilitating and developing secondary markets, or will it occur naturally? | The type of secondary markets operating for .com is likely to extend to .au without affirmative action. |
| | 6m If a secondary market were introduced for .au domain names, what would be the most appropriate framework through which it could be | The first step is relaxation of current restrictions and the processes to achieve this would take some time. |



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| | regulated? | At that stage, a framework could be modelled on emerging practices in the .com domain. It is agreed that the framework would need to mitigate the risks associated with cyber squatting and hoarding of names. |
| 6.7 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? | Yes, increasing the general community's awareness of the .au operations is appropriate. |
| | 6o Who should be responsible for funding awareness raising and education efforts? | Whilst funding may be derived from other sources such as Registrars, it is considered that the auDA should administer the awareness program. |
| | 6p Given that registrars and resellers are the primary point of contact for consumers, are their advertising campaigns sufficient in promoting .au? | The advertising campaigns of the registrars have been sufficient. |
| 7.1 representation of .au in international fora | 7a Is the current level of representation of Australian interests in international fora appropriate? | Yes, Australia's current level of representation is appropriate. |
| | 7b Is the balance between government, business and civil society participation in these international fora appropriate? | Yes, the current balance is appropriate. |
| | 7c With the aim of promoting domestic policy interests, are there other groups or organisations in which Australia could play a more significant | No suggestions. |
| 8.1 IP addressing including IPv6 | 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? | No, the separation is not helpful. Also the involvement of another government agency (Australian Communications and Media Authority) in sponsoring the trial of ENUM (Telephone Number Mapping) in Australia is another separation of responsibilities that is not optimal. |
| | 8b Aside from technical implementation and global allocation issues discussed above, what challenges should be addressed as part of the IPv4 to IPv6 shift? | Who will control and manage the IPv4/v6 gateways — is it the Internet Service Provider, or APNIC, or some other organisation? The transition plan for the deployment of IPv6 across the au domain also needs to be addressed. |
| 8.2 Convergence | 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? | ENUM (mentioned above under 8a), if it gains acceptance in Australia, will present policy challenges as it balances interests of major companies against public interest, |



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| | | and the individual privacy rights against the usefulness of an effective directory. (ENUM uses the e164.arpa domain rather than .au – but registrars for this e164.arpa operate for each participating country.) |
| | 8d Do these technical and structural shifts generate a need for changes to the current model for the management of the .au domain? | The responsibilities of auDA could be extended to include the Australian presence in e164.arpa. |
| | 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? | No suggestions. |
| | 8f Are there any other general comments you would like to make? | No comments. |