

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

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Contribution to the DCITA .au Review

Thank you for the opportunity to make a submission to the *Review of the structure and operation of the .au Internet domain* of October 2006.

This submission is based upon my involvement with the process of creating and implementing the .au domain operational model. I participated in the Australian Internet community's efforts to create an appropriate body to oversee the .au domain in the mid-1990s, and was a director of auDA from its creation in April 1999 through to November 2005. I also operate the main Internet discussion forum for .au policy matters at www.dotau.org.

In addition to my work on auDA, I have been involved in domain name administration matters in other countries through a role at the Council of European National Top Level Domain Registries (CENTR), the peak body for over 50 country-code domain operators in Europe and North America; and today manage DNS matters at the Internet Assigned Numbers Authority (IANA), a function performed by the Internet Corporation for Assigned Names and Numbers (ICANN). IANA is also the global coordinator of the IP addressing system, which is referenced by the Discussion Paper.

This submission is being made in a personal capacity only, and does not represent the views of my employer or any other organisation.

Responses to questions posed

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

Broadly, the registry-registrar model is appropriate for .au, as it allows for differentiated service levels and competition in the marketplace.

The appropriateness of the Australian implementation of a four-tiered operator-registry-registrar-reseller model is less obvious. There are marketplace inefficiencies that are introduced by the current model, but whether they are significant is unclear.

It could be argued that a unified registry operator (i.e. auDA) that provides purely basic domain registrations services, that is operated in a not-for-profit manner with clear oversight, cost controls and defined scope, would result in greater efficiency and improved outcomes. The current system of multiple layers, with both the registry and registrars operating for profit, theoretically cannot compete with a purely cost-recovery based model that has less levels of indirection. The role of registrars or resellers providing differentiated services could be maintained, but they would simply be value added services: with those companies acting as an agent for the basic registration service, but providing the optional extras beyond inserting the “NS” records in the parent zone.

I believe one area of concern is the operator-registry relationship, which is not functioning as originally envisaged and warrants review. I deal with this in detail in my response to Question 6a.

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?

In my experience, there has been an appropriate diversity of views on the auDA Board. The nature of those views and the substantial discussion of matters before the board may not be sufficiently expressed to the community, as it is not easy to gauge the level of board deliberation from the outside.

auDA recently restructured its board: eliminating a class of membership, and polarising its elected membership into either “supply” (domain sellers), or “demand” (both domain buyers and users). It is not clear what impact this might have on auDA’s progress in to the future.

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?

auDA's method of both acquiring these funds, and disbursing them, is relatively unique – but the notion of a country-code domain registry using proceeds from domain sales to invest in the public benefit of the local Internet is not.

As noted in the discussion paper, auDA received an unexpected once-off surplus following the release of generic domain names, originally prohibited under .com.au domain policy; and the mechanism decided to release this surplus was the creation of the auDA Foundation. A later release of reserved geographic domain names in concert with the deployment of geographic state domains (like .wa.au) resulted in another unique structure.

It is unclear whether the auCD approach is correct given its short lifespan, but it should be thoroughly reviewed and adapted based upon how it becomes adopted over time.

Ultimately it is both appropriate, and important, that auDA invest in research and development that furthers both the utility of the domain registry itself, and benefits the Australian Internet community at large. Whether the current model of investment led by the auDA Foundation and auCD is the best approach is unclear as it is a relatively untested process. However, a model whereby auDA itself had the capacity to invest in its own research and development programmes would be consistent with other country's approach to this.

Importantly, auDA must be careful about its scope, and there must be a clear line between what development work is conducted directly under auDA's mandate, and that which is done for the general betterment of the Internet. The notion that auDA be a general-purpose Internet organisation dealing with varied topics such as IP addressing, spam, network access and so forth needs to be avoided. auDA's specific focus must remain as the coordinator of Australia's sovereign domain name systems such as .au, and possibly closely related services such as "1.6.e164.arpa" (the ENUM domain for Australia), or the top-level domains of Australian dependencies¹ should they not have a better local alternative.

With respect to auDA's revenue streams, auDA should adjust these in light of its goals. Whilst appropriate investment in research, global outreach and other programmes is advised, ultimately if auDA receives consistent surpluses it should compare the capacity to fund relevant new programmes against the ability to lower the cost of domain ownership to the community. This is a delicate task – historically cost reductions in auDA's fees, or wholesale costs, haven't materialised matching reductions to end-user pricing. auDA's reductions in costs should not purely be for the enrichment of the registrar industry. Research in other countries has considered that the maximum market benefit is not necessarily derived from having the lowest possible operator/registry price point.

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?

Yes, the governance structures for the .au domain are appropriate.

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

Yes, the not-for-profit industry self-regulatory model is the most appropriate way to manage .au domain. It is a tried-and-tested model that succeeds globally, and allows for broad participation from the community - from the end-user to corporations to public-interest organisations, and allows for suitable participation of government.

¹ There are five country-code domains that are under Australian remit. Beyond .au, there is .cc (Cocos Keeling Islands), .cx (Christmas Island), .hm (Heard & McDonald Islands) and .nf (Norfolk Island).

- 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. auDA's role should be principally management of the .au domain. auDA is not engineered to be a general-purpose Internet regulator or coordinator, and should not stray from its core mission, or be distracted by being everything to everyone. Whilst the Australian Internet community undoubtedly has needs beyond what auDA can accomplish, careful analysis must be conducted as to whether auDA is the appropriate body to deliver on those needs.

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

auDA has performed reasonably well at achieving these stated aims, but not without controversy, and not with a perfect track record. There are a number of criticisms that could be levelled at auDA on how it has conducted itself, however in sum auDA has taken great strides in improving the .au domain space with respect to its principle aims.

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

Yes, and they are generally consistent with the traditional role ccTLD managers play in other countries.

- 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's current level of participation in .au domain management has been important and appropriate.

- 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?**

I believe auDA performs a relatively good job of considering the views of key stakeholders, which importantly includes a diversity of opinion. There is a natural tension between the interests of those who profit directly from the domain space, and the responsibility to steward the .au domain's development for the good of all its users, both present and future. Thus far auDA has carefully balanced these conflicting views.

auDA must continue to engage the domain retail community (registrars, resellers, etc.), domain purchasers (registrants), and non-registrants who are Internet users (who despite not owning a domain, are affected by domain policy matters). It must engage them both directly – allowing

individual participation in the process, and also through appropriate representative bodies that can serve to coalesce views from specific communities. It must also consider the views of technical experts, intellectual property owners and so on to ensure its approaches are appropriate and practical.

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

The .au domain is operated competently, and I have no substantial concerns regarding its security and stability. auDA has not however deployed or trialled DNSSEC, a technology that is under extensive development and will enhance security of the DNS when sufficiently deployed². Work on DNSSEC for the .au domain may be hampered by auDA's structure, which means it does not have any internal research and development capacity. (see responses to Questions 6b and 7a)

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

The choice between a flat or hierarchical namespace in .au could be considered a religious argument with no compelling right or wrong answer. Flat namespaces give more flexibility, shorter names, and possibly less confusion. Hierarchical namespaces provide for more address space, so there are more attractive names available that match a registrant's name, product or service. Both have considerable benefits and drawbacks. The largest country-code domain registry in the world offers a flat namespace, the second largest uses hierarchical.

It is important to note though that any change to flat from hierarchical can never be practically reversed, so must not be done without careful and thorough consideration. It would also result in a huge land-rush with many "sunrise" implications.

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

The benefits of additional second-level domains under .au would include the diversification of the taxonomy, allowing for a greater range of alternative domain names. It would present the user with greater choice, and may offer increased price competition – particularly if operated by a competing registry operator.

The addition of too many second-level domains may result in user confusion, with the mnemonic capacity of domains eroded. The proliferation of "brand protection", whereby companies defensively register trademarks in all conceivable public namespaces, could become an issue also.

² Forgery of DNS traffic is trivial in the standard protocol, which provides no security safeguards. Such forgery could direct Internet traffic away from its intended target. DNSSEC is an add-on to the DNS that cryptographically asserts the DNS data was not tampered with in-between the registry and end-user.

A measured approach to introducing new second-level domains based upon demonstrable demand would be unlikely to have a significant negative effect, and likely many positives.

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

There have been some cases when operational changes or new policies have been implemented without advance notice to the general public, with no ability for public participation in the policy's formulation other than through indirect means such as lobbying auDA directors. As it has not been practice for board members to explain their deliberations in public, or canvas specific opinion on an issue prior to decision-making, this is not an effective mechanism to channel contributions into the board's considerations.

5d Should all auDA policies have formal review periods?

Yes. Changes to auDA policies, or operational practices, should be exposed to public review.

Unless there is a compelling reason not to, a standardised procedure that sees all policies reviewed in advance of implementation would be a welcome alteration to auDA practice. It should allow for draft policies to be published, along with their rationale and an analysis of the implications, followed by a predictable public comment procedure. After the public comment period, those comments should be analysed and distilled into a report. This analysis should then be presented to the board, or if there is substantial dissent, further community engagement should occur. Timelines for implementation should be advertised in advance.

Key policy should continue to be defined by the rigorous Policy Development Panel (PDP) process, in which a panel of experts derived from the community conducts an extended analysis and consultation.

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

By outward appearances, the policy enforcement mechanisms are not sufficient to police abuses of the naming system as they related to domain eligibility criteria.

It has been a consistent point of contention as to whether .au domain should have eligibility based rules (as opposed to “.com”, for example, which allows for any domain to go to any party unless it is used in bad faith against a trademark holder.) However, policy reviews have maintained that .au should retain eligibility requirements that ensure a domain name reasonably matches the purposes for which it is used.

The current .au eligibility criteria is underpinned by warranty – the registrant warrants they are eligible, but unlike in previous times, there is no comprehensive judging of criteria before a domain is registered. The policing by auDA of eligibility is complaint-based, rather than

proactive, which gives rise to abuse where registrants can falsely warrant eligibility without a genuine prospect of being caught.

Once notified of a breach, auDA appears to be quick to react and obtain a desirable outcome. However, it may not be the best approach to simply allow transgressions to go un-noticed until there is a specific complaint raised. This allows for subversion of the intent of eligibility-based domain criteria, which aims to ensure domains are only registered by those who are eligible, and the remainder are left unencumbered for future registration.

It is likely appropriate for auDA to take a more proactive role in ensuring eligibility criteria is adhered to. Random audits of eligibility might help first identify the scope of the problem, and also help remedy faulty registrations.

The increasingly open interpretation of the “close and substantial connection” rule³ has made testing eligibility harder. The rule was designed for the very narrow purpose of allowing names such as “salvos” for “Salvation Army”, originally prohibited under earlier policy because the letters were not a strict subset of the full name. Today the interpretation of the boundaries of this rule has deviated to such a point it has little resemblance to the original intent. If it is deemed the close and substantial connection criteria are, in practice, a loophole that provides no hindrance to choosing practically any name under a tenuous premise – then there needs to be a discussion about whether the eligibility criteria has any weight at all, and whether it should be remedied or abolished.

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

Largely yes. Prior to auDA, domain operations in .au were operated by unaccountable parallel monopolies. This has been replaced by model whereby multiple registrars compete on price and service. The model has resulted in a differentiated marketplace for the retail of .au domains. The net result is much lower prices for domains, and substantially improved service levels.

One area where competition has not achieved expected diversity is at the registry level. There was much debate during the formation of auDA as to what competition there should be at the registry level⁴. Whilst the registry is a natural monopoly, due to the requirement for a single definitive database of domain names, the auDA Competition Panel found that there could be competition between registries for different second-level domains. For example, one registry could operate .com.au, whilst another could operate .net.au, and they could compete on price and service against one another.

³ <http://www.ada.org.au/policies/auda-2005-01/>, Schedule C, Part 2b.

⁴ As one of the prime motivators for the deployment of auDA was to remove an entrenched monopoly that wasn't considered to be giving a value-for-money service, there was a great deal of sensitivity to this. As a result, the general thrust of .au competition policy was to make it as multi-faceted as possible, with the natural monopoly component as tightly defined as possible.

This model is deficient. For a second successive period, a single operator operates practically all second-level domains under .au, and faces no intra-.au registry competition. Furthermore, it has become so ingrained that during the competitive tender process in 2005 to decide the registry operator for the following four years, there was essentially no competition against the incumbent.

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?

Considering the answers to 6a, market improvements may be attained by re-evaluating how registry competition works, and whether the current model is appropriate. If it is determined that registry competition will not occur as envisioned, then the entire relationship of auDA and its registry outsource partner needs to be rethought.

In particular, it may result in reconsidering whether the registry's technical operations should be operated internally to auDA, in the same way as most leading domain registries. It would also allow auDA to be more nimble, introducing new technologies and policy developments on its own timetable, rather than needing to wait for the expiration of a four-year agreement to specify new operating conditions⁵.

If the outsource model for the registry is retained, it needs to be operated in a process that ensures healthy competition between registry service providers.

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

At \$2.48 per year, the auDA domain fee is not excessive. It has historically been revised down as there has been growth in .au domain registrations, and sufficient funding helps ensure the stability of the .au domain space. Most important is continued transparency in auDA's functions, costs and budget – so that the community might assess the appropriateness of the organisation's income, expenditure and work programme. It may be appropriate for auDA to produce an Annual Report that explains its work for the year in detail, and outcomes achieved.

It is important to note the pricing comparison provided in Section 6.4 of the Discussion Paper is faulty. The notion that a .de domain costs €58-€116, or that a .uk domain costs £80, does not reflect real pricing. Whilst this is the direct price for dealing with DENIC or Nominet (the equivalent of an end user registering a domain directly with auDA), like other European

⁵ The only formal mechanism for auDA to introduce substantial new registry services is to re-specify the contract with its outsource provider, which lasts 4 years. This gives a narrow window every 4 years for auDA to predict its technical requirements up to five years into the future.

registries such registrations are priced artificially high to specifically discourage the practice⁶. The real wholesale cost of such domains is just a few dollars per year⁷.

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

There is a real prospect of both occurring. There is no reason to believe liberalisation wouldn't result in meaningful growth in .au, but similarly it is likely to also lead to hoarding and other activity inconsistent with the general principles that have defined .au domain policy to date.

As with Question 4c, what is clear is that relaxation of the rules is irreversible, and would result in a one-time land-rush, so must be carefully considered.

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?

If we are to retain the current notion that there is an eligibility requirement for .au domains, where the name must be connected to the registrant's name or operations, there is less rationale for a resale/secondary market for domains. Domains are restricted, in theory, to those eligible under the criteria, and transfer can occur by returning them to the pool and having the new registrant apply.

A fully liberalised and open secondary market may encourage an undesirable speculation market. One of the advantages of the controlled domain eligibility policy for .au is a newcomer to the marketplace generally has an increased likelihood of getting the domain name they want at the regular price. In contrast, current activity in the global top-level domain marketplace sees it complicated by a speculation market. Symptoms of the high level of monetisation include a staggering quantity of domain registrations purely designed to serve generic advertising of little or no end-user value.

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

There would need to be more careful policing of eligibility if a secondary market is introduced (see Question 5e). Manipulation of the rules may result in greater returns if domains could be turned for a profit, and therefore such liberalisation either requires a rethink of eligibility criteria, or more appropriate enforcement or monitoring.

⁶ The common industry term for this practice is "registrar of last resort".

⁷ This is likely the real reason domain registration volume is so high in Germany – .de domains are cheap enough that registrars will literally give them away for free. I have been the registrant of several unwanted .de domains simply because they have been thrown in as free extras with other Internet services.

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

Generally speaking, the .au domain benefits when more of the community participates and is aware of its administration and its activities. This is particularly highlighted by the deceptive market conduct exhibited in recent years by companies sending unsolicited domain renewal notices. Had the victims been better informed about .au, the impact would likely have been less.

The processes of auDA also benefit from increased participation – a greater diversity of inputs can only assist the processes that help refine .au policy and procedures.

7a Is the current level of representation of Australian interests in international fora appropriate?

With respect to auDA’s representation, I believe it has played a notable role in the policy surrounding domain names and Internet governance on a global level. auDA was an early backer of ICANN, for example⁸. Given its small staff, it may even be considered by some that auDA spends too much time in international engagement given the substantial financial, time and travel commitments it entails. However, it remains important that auDA continue to engage in Internet governance discussion at a global level in a measured way.

One area I believe auDA can improve is in its participation in technical and operational development. Contrary to the Discussion Paper, the .au domain management is not a noted participant in technical development forums such as the Internet Engineering Task Force (IETF), or technical workshops of country-code domain managers. This perhaps is to be expected – the outsourcing of technical operations to AusRegistry has meant that in-house technical expertise within auDA has not been a necessity. auDA has instead largely relied on the expertise of its Standing Technical Committee, technically astute directors, and outsource partners to help guide its direction on these matters. This guidance in my experience has been more reactive than proactive, and primarily consists of solving ad-hoc operational problems that arise.

By having auDA not participate in new technology developments, it is disadvantaged in identifying technical innovations that will impact or improve its operations, and it is not providing important perspective on the technical matters under consideration. AusRegistry, as an outsource partner that is only required to fulfil the terms of its contract, does not have direct incentive to participate either⁹.

In contrast, most other country-code registry operators handling domains comparable that of .au actively participate in the development of new and improved technical standards,

⁸ auDA was the first country-code administrator to form a contractual relationship with ICANN, although it should be noted it was an ICANN requirement at the time for auDA to do so in order to be installed as the official operator of .au.

⁹ It may have other incentives to, though. As a company trying to market its registry solutions to others, being on top of new technology may be a positive marketing aspect.

participate in the technical debate on their implementation, run trials and test-beds, and help spur implementation of appropriate technologies.

The participation in the Australian Government has been welcome, particularly as it has championed the principles of Internet self-governance in a variety of forums. These principles are consistent with the way the .au domain has operated, and indeed respects the way the Internet has flourished over the years without heavy-handed government intervention.

More generally, participation by Australian citizens in Internet fora is high. As identified by the Paper, Australians are involved in a number of key positions in various notable organisations, and contribute actively to the debate that shapes global Internet governance matters.

7c With the aim of promoting domestic policy interests, are there other groups or organisations in which Australia could play a more significant role?

As identified in response to Question 7a, there may be specific benefits to increased participation by the domain operator in forums that deal with technical and operational best-practice advancement. Generally though, Australian interests actively participate in a wide variety of forums.

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?

Yes. Whilst there may be minor synergies, the current process of IP address allocation is substantially different to domain name allocation, and does not warrant harmonisation. IP addresses, due to technical necessity, are delegated through a system that encourages resource preservation and routing efficiency. This is undertaken predominantly at a regional level, and end-users and companies using the Internet generally do not directly get their own allocations of IP addresses from the registry. Instead, their Internet service provider will assign them blocks based upon need and Internet architectural considerations. This is in contrast to domain name allocations, where there are no architectural concerns relating to who licenses a domain name, and less necessity to consider resource conservation or architectural impact.

The model of a National Internet Registry (NIR) is not common, and as noted in the discussion paper Australia had its own NIR in the form of AUNIC, which was discontinued in favour of the Regional Internet Registry model. auDA formally ceded the management of AUNIC-allocated space to APNIC when it assumed control of AUNIC for .au management purposes.

8b Aside from technical implementation and global allocation issues discussed above, what challenges should be addressed as part of the IPv4 to IPv6 shift?

Simply put, .au operations should be fully IPv6 aware and capable. Whilst IPv6 is not yet in widespread deployment, the .au registry should be ready for those who are capable of using IPv6 today, and not hinder those who wish to commence migration. At the moment the .au name servers are not substantially connected through IPv6¹⁰, and key services (WHOIS, web sites) are not visible with IPv6 addresses.

There may be a discretionary role for auDA to help spur IPv6 adoption in support of general Internet aims – such as through auDA Foundation grants, but this is not a core auDA function and should be separate from its direct responsibilities for the .au domain.

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?

Given the narrow scope of auDA's role, it should not be considerably impacted by these events. In the broadest sense, the increasing adoption and reliance upon the Internet does require the domain name system to become more robust. auDA must continue to strive for faultless technical service, as the risks on Internet usage are great if there is technical failure of the .au domain.

Some specific convergence cases rely heavily on the DNS, and auDA has a role to play as it relates to Australian name spaces. For example, the convergence of telephony and the Internet has resulted in ENUM – which maps telephone numbers into Internet addresses. This is something that should be at a minimum monitored by auDA, but may benefit from its active participation or stewardship.

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

At this stage, there are no indicators to suggest that the .au domain is unable to meet with industry demand. auDA should constantly review itself in relation to these matters, and evolve in appropriate directions – but there does not appear to be a need for fundamental alterations to the current management model.

¹⁰ For example, out of ten authoritative nameservers for the “com.au” zone only one is IPv6 capable. This authoritative nameserver, *ns-au.ripe.net*, is located in Amsterdam, Netherlands. This is a voluntary service provided by the European Regional Internet Registry, RIPE NCC, and is not operated by auDA or AusRegistry.

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?

Whilst generally auDA is performing well, to recap some specific recommendations on improving the .au domain's operation and governance:

- ▶ Provide routine opportunities for public input into new practices and procedures.
- ▶ Improve participation in technical forums to ensure auDA and its partners are ready for new technological developments, and contribute their experiences and concerns as input into standardisation work.
- ▶ Carefully consider its portrayal to the general public, ensuring it is appropriately recognised as the manager of the .au domain, and reducing user confusion on who they should approach for authoritative .au information.
- ▶ Monitor and participate in closely related fields, but not over-extend auDA and have it work in areas that are not related to its core purpose of Australia domain management.
- ▶ Study the real-world impact of the domain eligibility criteria, to understand whether in practice adherence and policing match the policy intent. Deficiencies should be reviewed and remedied with a workable policy and implementation.

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

DCITA must be thanked for conducting this general review of the .au domain management's successes, failures and progress. It is important to step back and re-assess the progress of the industry self-regulation model of the .au domain. I hope that the Internet community can take the results of this study to assist it in further developing the .au domain to be a world-leading example of domain name management.

This critical analysis however should not diminish from the great work that has gone into improving the .au domain since serious collaboration on the project began in 1996. It is easy to forget the issues that urged the creation of auDA, and what a success the community's work has been in creating auDA and a new management model for .au. Today the .au domain works very well. This contribution by many participants over the course of this past decade should be recognised as a great accomplishment.

Respectfully submitted,



Kim Davies