

.au Domain Administrator Ltd  
Level 17  
1 Collins Street  
Melbourne  
VIC 3000

24 November 2019

Dear auDA

**RE: .au Namespace Implementation Rules.**

Under the proposed implementation of direct registration the application fee for a "Token" has been set as the same as the .au wholesale fee. This fee is proposed to be an ongoing annual fee, to which I am opposed.

The Policy Review Panel made the following comments in its Review

***Fees and Costs:**The Panel has no jurisdiction to set or determine fees or costs. However, the Panel's view is that any fees charged in relation to the implementation of direct registration (for example, to acquire a token) should be on a cost recovery basis only. Consideration should be given to capping the cost of tokens for registrants who own a significant number of domain names.*

While there will be costs associated with the implementation of the system to manage the tokens associated with the Lockdown Model, I see no reason for an annual charge to be imposed upon registrants to maintain their interest in contested domains.

I agree that an annual "confirmation of interest" be maintained, however this can be managed in a similar way to the ICANN Whois Data Reminder Policy (WDRP) which Registrars are required to administer. **This process is conducted annually and at no charge.**

Yours sincerely

Ian Halson