

Jo Lim, Chief Operations and Policy Officer, auDA
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Dear Jo Lim,

I, Kerry Gray, would like to make the following submission in response to the 2015 Names Policy Panel Issues Paper that was recently published for public review and comment.

1) Direct Registrations in .au

There is clear demand for domain name policy that simplifies the .au space, increases choice for registrants and ensures the continuing relevance of the .au brand in a market flooded by new generic Top Level Domains.

Now is the time to commit to the introduction of registrations in the second level (i.e anything.au). Other markets such as .uk and .nz have successfully enacted this change and provide compelling case studies for us to follow.

There is too much poorly understood policy in the existing open .au domain spaces. New registrations should not be burdened by the same degree of red tape. New registrations in the second level must be open to anybody with an Australian postal address.

The implementation process should be a separate project. It should involve a brief sunrise period to protect the rights of genuine, existing trademark holders. After the sunrise, the space should be opened to the public through a land rush process that allows for domains to be registered on a "first come, first served" basis.

2) Existing 2LD eligibility and allocation policy rules

a) The restriction of license periods to exactly 2 years is an administrative burden which limits choice. It serves no public benefit in a highly competitive market and should be immediately removed to allow for license periods of 1 to 10 years.

b) The principles of "first come, first served" need to be retained. Further, auDA should engage in a process of ongoing public education that reinforces this message.

c) It is confusing to have different domain spaces with identical sets of policy rules (e.g.: .com.au/.net.au and .org.au/.asn.au). This should be used as an opportunity to streamline policy within existing spaces, making it accessible to the wide community of users

The rules for .net.au and .asn.au should be removed so that both become open spaces for all Australians. Restrictions should also be removed from use of id.au.

d) The "close and substantial" rule appears to be working as is.

3) Other 2LD policy rules (reserved list and misspellings)

The existing policies on the reserved names and misspellings are suitable as is. However, domains on the list should be not able to be registered at the Registry. They should show up as unavailable in a domain search.

Sincerely,

Kerry Gray

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