



Internet Society of Australia  
A Chapter of the Internet Society  
ABN 36 076 406 801  
C/- Maddocks, Level 7, 140 William Street  
Melbourne, Victoria 3000  
Accounts: P.O. Box 351, Glenorie NSW Australia 2157

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To: Jo Lim, Chief Policy Officer  
auDA  
By email: [jo.lim@auda.org.au](mailto:jo.lim@auda.org.au)  
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## **New 2LDs: DISCUSSION PAPER**

The Internet Society of Australia (ISOC-AU) welcomes this opportunity to comment on the auDA Inquiry into new second level domains (2LDs).

ISOC-AU's fundamental belief is that the Internet is for everyone. We provide broad-based representation of the Australian Internet community both nationally and internationally from a user perspective and a sound technical base. We also consistently promote the availability of access to the Internet for all Australians.

In our view, Domain Names, including new second level domains, should be viewed as a public resource to be managed in the interests of Internet users including individuals seeking access to Internet sites and registrants providing those sites.

The Discussion Paper raises two issues: the appropriate policy and process for consideration of new 2LDs, and a response to specific proposals for new 2LDs, including consideration of two little used existing 2LDs (info.au and conf.au) and two proposed new 2LDs (blog.au and event.au).

The Society's response to the Terms of Reference are as follows:

### **1. NEW 2LD POLICY AND PROCESS**

#### **1.1. Policy**

The two elements of auDA policy on new 2LDs are that a new 2LD must be in the public interest, and that no proprietary rights should attach to a 2LD. In elaborating on what is meant by the 'public interest', the Discussion Paper lists a number of issues that should be considered, including:

- Preservation of integrity and usability of the .au domain space
- DNS hierarchy issues
- Purpose of the DNS
- Precedent-setting
- Commercial considerations
- No proprietary rights

In the discussion under each heading, important points are made that we support including:

- Not allowing new names that merely duplicate existing names
- Preference for 'guessability' and memorability of names that help identify the generic type of registrant (to both potential registrants and users)
- The use of short, simple abbreviations (such as org or asn) rather than more specific terms (e.g., charity or company)
- Having some level of demand for the name that will make the name sustainable, rather than fall into disuse
- No proprietary rights are created such that rights to a new 2LD are held by a single organisation or individual

From the user perspective, ISOC believes that, as far as possible, new 2LDs should not add to the complexity of the system and should only be accepted if they bring to mind a category of entity that is not covered by existing 2LDs. Under auDA's *Domain Name Eligibility and Allocation Policy Rules for the Open 2LDs (2008-05)*, apart from general criteria for open 2LDs there are specific criteria against each of the categories that prospective registrants should meet. If a new 2LD is to be accepted, there should be clear criteria that applicants for a name under that 2LD must meet, giving guidance both to prospective registrants and users.

As the Discussion paper admits, entities now believe they must defensively register a name under more than one 2LD simply to protect the individual or entity. This adds both to the cost for entities, including small businesses and non-profit organisations, and to end user confusion. Adding more 2LDs that are not distinct from existing 2LDs will compound both the cost and the confusion.

*Recommendation:*

*The primary criteria against which proposals for new 2LDs are judged should include:*

- *The name should be a short, simple abbreviation*
- *It should help users and registrants identify the type of entity appropriate for that name*
- *It should not be similar to a category of registrant already covered by existing names*
- *There should be clear criteria that can be used by auDA and registrars to delineate appropriate applicant registrants*
- *There should be some level of demand that can be demonstrated*

## **1.2. Process**

*Recommendation:*

*In deciding on proposals for new 2LDs, the process that should be followed is:*

- *The use of auDA's standard practice of establishment of an Advisory Panel representing all stakeholders to consider the proposal against agreed policy criteria*
- *if the proposal potentially meets criteria for new 2LDs, develop a Discussion paper that is released for comment, followed by consideration of comments received, release of a second paper with Panel conclusions, with final Panel consideration of comments and development of recommendations to the auDA Board.*

## 2. PROPOSALS UNDER CONSIDERATION

### 2.1. *Blog.au*

ISOC-AU agrees with the preliminary findings of the Advisory Panel on the following grounds and would not support creation of this new 2LD at this time:

- The name does not indicate a generic type of registrant, but rather indicates a particular purpose for which the name would be used
- Any person can already set up a blog on existing sites
- No demand for the name has been demonstrated.

### 2.2. *Event.au and conf.au*

ISOC-AU agrees that these names be considered together as they both address an events-related name. Both meet most of the criteria: the name is short, is generic covering an identifiable category of registrant that would be clear to both aspiring registrants and end users. Of the two, ISOC-AU would prefer that event.au be accepted over conf.au. The former could apply more broadly to a range of activities including fairs, tournaments, parades, and therefore more useful to end users, while still referring to a particular activity.

At this stage, there does not appear to be evidence of demand for the name, but if there is sufficient interest in the name to meet the 'sustainability' test, event.au should be accepted.

### 2.3. *Info.au*

The Discussion Paper lists three different ways in which this name might be used:

- For registrants who would not be eligible under existing 2LDs
- For 'major information resources'
- For premium commercial registrations
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The first and second suggestions would not meet the criteria. It is not clear how either of the two categories would be defined sufficiently so that both proposed registrants and users would understand the category of entity that would come under this 2LD. The third suggestion would simply create a name that could be exploited by registrars and lead organisations into making defensive registrations. There is also no demonstrated demand for the second and third use of the name.

From registrars' anecdotal evidence, there is some demand for a new name for registrants who do not fit into existing 2LDs (largely individuals or informal groups). If sufficiently clear criteria can be developed for that group of people such that the name's use is clear to registrants and users, it might be further considered as a new 2LD.

We will be happy to provide any further comments on issues raised by this Inquiry

Tony Hill  
President  
Internet Society of Australia  
[President@isoc-au.org.au](mailto:President@isoc-au.org.au)

Holly Raiche  
Executive Director  
Internet Society of Australia  
[ed@isoc-au.org.au](mailto:ed@isoc-au.org.au)