

Jo Lim, Chief Operations and Policy Officer, auDA  
email: [jo.lim@auda.org.au](mailto:jo.lim@auda.org.au)  
fax: 03 8341 4112

Dear Jo Lim,

I, Ricardo Vatner, 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) Do new gTLDs pose a threat to the “.au brand”?**

I do not believe any gTLDs pose a threat to the .au brand except .com.au which has wide acceptance and substantial desirability as a domain address. Whether or not the .au brand can become a desirable domain, in the way that .net.au has not, will depend on issues dealt with below.

### **2) Is there evidence of any market demand for direct registrations?**

I don't think this is a relevant question because people don't demand what they don't know about. There is a frustration that domain names are becoming increasingly difficult to find as they are already taken. Although in many cases they are not in use.

I think this is an indication that whatever the current rules say, there is a substantial degree of cyber-squatting occurring in the Australian domain space.

Adding a new ccTLD that has general acceptance as a quality domain name address could help companies get the names they require subject to my comments and concerns outlined below.

I do not believe a .au ccTLD would pose a threat to most businesses as my experience has been that large brands protect their name by buying all possible TLDs and ccTLDs appropriate to their brand whereas smaller companies are far more cost conscious and usually register only the most appropriate domain names, which in most cases is the .com.au and less often, the .com (if it is available).

However, for the same reasons mentioned above, I wonder how well received the new .au ccTLD would be. The com.au brand is well established in Australia and most businesses will probably still ask for that in preference to any other Australian domain name. They would perceive a .au as second best to a .com.au and as an adviser to them, I would have difficulty recommending a .au if there was a competitor using the same name as a com.au. In fact the only reason to buy such a .au name might be to confuse the public with information not relevant to the .com.au holder.

For the .au brand to gain significant acceptance and subsequent wide spread use it would need a long term, significant, promotional campaign aimed at potential users from large to small (including individual) business owners.

### **3) What types of registrants/users would benefit from direct registrations?**

Any business could benefit from direct registration but would also be subject to the corresponding disadvantage that if they do not purchase the .au version of their domain name, it could be used by a competitor to their disadvantage. I cannot see any reason

why a business would want to buy a .au domain name where there is already a more widely used .com.au version of that name in use.

I do not think the .net.au example is relevant here as this domain name brand has not gained wide acceptance in Australia thus if a business owns the .com.au they are substantially protected as very few (if any) potential users would type in a .net.au after the name of a web site. If the .au brand was heavily promoted, as it would need to be, then this would increase the chances of it becoming a problem to .com.au owners.

**4) What policy rules should apply to direct registrations and should the domain name licence period remain fixed at two years? Should the current 2LD eligibility criteria (ie. restricting com.au/net.au to commercial entities, org.au/asn.au to not-for-profit entities, id.au to individuals) be modified?**

There are so many examples where the current rules are circumvented that I believe there is a strong case for streamlining and reducing them. I believe having an Australian address should be the sole prerequisite for purchasing an Australian domain name.

However in one area, i.e. the flexibility of buying a long term registration, we are sadly deficient.

I believe we should offer periods of 1 year through to 10 year registrations.

This would allow for short term campaigns but more importantly reduce the administration cost of managing domain names. It would also reduce the frequency of the chance occurring that a business could lose a domain name due to missing a renewal deadline.

Obviously it is incumbent upon the business to have a system in place to renew their domain names at the appropriate time but offering 10 year renewals reduces this risk by 5 times over the ten year period.

**5) What issues would need to be taken into account as part of the implementation process?**

For all the reasons outlined above, we need to provide existing domain name holders with the opportunity to acquire the .au version of their domain name before offering it to the public.

However, the most important factor to be considered before implementing this new ccTLD is what level of promotion will it get and for how long?

If the domain does not gain wide acceptance and "desirability" then it will be a waste of time and effort.

Sincerely,

Ric Vatner

CEO

Better Alternative Communications