

ACPET submission to
“Review of the edu.au Domain’s Governance
Arrangements and Eligibility and Allocation Policies”
Discussion Paper

January 2015

“Review of the edu.au Domain’s Governance Arrangements and Eligibility and Allocation Policies” Discussion Paper

Introduction

The Australian Council for Private Education and Training (ACPET) welcomes the opportunity to provide a response to the ‘*Review of the edu.au Domain’s Governance Arrangements and Eligibility and Allocation Policies*’ (Discussion Paper).

Established in 1992, ACPET is the non-for-profit national industry association for private providers of post-compulsory education and training. ACPET has over 1,000 members nationally who deliver a range of Higher Education, VET and English language courses across all States and Territories and internationally. As all of our members are required to be registered training organisations, all have the option to select edu.au within their domain name.

ACPET’s mission is to enhance quality, greater choice and innovation in Australian education and skills training. It represents a range of providers including commercial and not-for-profit entities, community groups, industry providers and enterprise-based organisations. ACPET works with governments, industries, and community organisations to ensure Higher Education and VET services are well targeted, accessible, and delivered to a high standard.

ACPET recognises eDAC as the most appropriate mechanism to manage the policy and administration of the .edu.au domain. ACPET supports the maintenance of the existing criteria and believes that there is no compelling to change the current eligibility criteria.

ACPET in principle supports the recommendations within the discussion paper that support the sector being internationally recognised through the edu.au domain name and the e DAC efforts to minimising costs in regards to domain licencing for RTOs.

ACPET and its members are pleased to work with Government to implement sustainability and changes to protect the sector.

Response to Discussion Paper Questions – “Review of the edu.au Domain’s Governance Arrangements and Eligibility and Allocation Policies”

R1. That no changes be made to the arrangements for the management of edu.au domain policy by eDAC, nor the composition of eDAC.

ACPET is satisfied with the current arrangements and composition of eDAC for managing edu.au domain names.

R2. Once the proposed reform of the Higher Education sector is settled and its impact apparent, eDAC should consider whether changes are warranted to the higher education sector representation on eDAC.

ACPET agrees that it is important that the composition of eDAC includes all sub-sectors of education. For example, there should not be favouritism towards Higher Education in terms of representation regardless of the reform outcomes.

R3. That no changes be made to the registrar arrangements for the edu.au domain.

It is vital to have a single registrar for the edu.au domain to avoid confusion, duplication and provide consistency. ACPET finds the current registrar informative and easy to navigate. The risks associated with the introduction of a competitive model would not outweigh any benefits derived from this action.

R4. That the current interim governance arrangements be confirmed as appropriate for the edu.au domain.

ACPET is satisfied with the current interim governance arrangements for the edu.au domain.

R5. That a formal, published pricing policy be established where:

- a) The objective is to keep the fees for an edu.au domain name license at a minimum; and**
- b) Pricing is subject to regular review, including periodic external independent scrutiny.**

For transparency, the establishment of a formal pricing policy made available to the public would be welcome. ACPET welcomes the efforts of eDAC to keep the pricing at a minimum and agrees with the view to conduct annual pricing policy reviews and a major review every four years.

R6. That the current eligibility policy be restructured and simplified by dividing eligibility types into two categories:

- a) entities for which there is an appropriate accreditation/registration authority; and**
- b) entities where there is a need to rely on warranties and references as there is no appropriate accreditation/registration authority.**

This is a common sense approach where genuine providers of education services should be able to apply for domain licensing through an easy and streamlined process.

R7. That the evidentiary requirements for entities where there is no appropriate accreditation/registration authority be standardised and simplified, with the process to involve the applicant:

- a) warranting that their primary function is the provision in Australia of education, training, education and training related research; and/or education and training related services; and**
- b) providing a reference in a standard form from an unrelated entity that currently holds an edu.au licence where the reference:**
 - i. warrants that the referee is an eligible entity under current policy and holds a current edu.au domain name licence; and**
 - ii. warrants that the applicant's primary function is the provision in Australia of education or training; education and training research; and/or education and training related services.**

ACPET agrees with the recommendations in R7.

R8. That eligibility policy be amended to:

- a) ensure that if an entity is eligible under a category where there is an appropriate accreditation/registration authority, they must apply under that category;
- b) remove references that research organisations need to be in receipt of funding;
- c) provide examples of the type of bodies that fall within the category of national bodies; and
- d) define the term ‘related services’ to ensure that it is clear that it refers to services whose primary function is the provision in Australia of services specifically related to education and training

ACPET agrees with the recommendations in R8.

R9. That eligibility policy be amended to allow schools that are being established to obtain a domain name prior to achieving formal accreditation/registration if a warranty from the relevant government authority/governing body is provided.

ACPET agrees with the recommendations in R9.

R10. That the current allocation policy be amended to clarify that the Registrar does not need to assess whether the project or program is educational in nature.

ACPET agrees that the Registrar should not have to assess a project or program is educational but should solely focus on the eligibility of the applying entity..

R11. That no policy change is required in relation to the current allocation rule ‘first come, first served’.

ACPET agrees with the recommendations in R11.

R12. That no change is required to the policy rules controlling the level of edu.au domain name that different applicant types can register.

ACPET agrees with the recommendations in R12

R13. Once the proposed reform of the Higher Education sector is settled and its impact apparent, eDAC should consider whether changes are warranted to the policy rules controlling the level of edu.au domain name that different applicants can register.

ACPET agrees with the recommendations in R13.

R14. That no change is required to the policy rules requiring there to be a direct link between the name of the applying entity (or related project or program) and their proposed edu.au domain name.

ACPET agrees with the recommendations in R14.

R15. That no change is required to the policy rules governing the types of words and terms that are restricted or that cannot be registered as an edu.au domain name.

ACPET agrees with the recommendations in R15.

R16. That the current rules in Policy 10 –edu.au Mandatory Terms and Conditions regarding prohibitions on the redirection of domain names be carefully reviewed to ensure they do not prevent instances where the redirection of domain names could not be considered to undermine the integrity of the edu.au domain.

ACPET agrees with the recommendations in R16.