

## Response to Discussion Paper - Public Review of edu.au Domain's Governance Arrangements and Eligibility and Allocation Policies

|  |   |
|--|---|
| <b>Name of organisation or person submitting this response</b> | ABC Studygroup Pty Ltd Trading as Australian International College of English. Heidi Reid Principal |
| <b>Date Submitted</b>  | 21 January 2015   |

| # | Recommendation   | Response   |
|---|--|--|
| 1 | That no changes be made to the arrangements for the management of edu.au domain policy by eDAC, nor the composition of eDAC.   | we approve and appreciate the way it is run, but would like ELICOS to mentioned specifically. While English colleges are part of ASQA, they are not, in fact, RTOs |
| 2 | 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.  | no recommendations   |
| 3 | That no changes be made to the registrar arrangements for the edu.au domain.   | Agreed   |
| 4 | That the current interim governance arrangements be confirmed as appropriate for the edu.au domain.  | Yes  |
| 5 | That a formal, published pricing policy be established where: <ul style="list-style-type: none"> <li>a) The objective is to keep the fees for an edu.au domain name licence at a minimum; and</li> <li>b) Pricing is subject to regular review, including periodic external independent scrutiny.</li> </ul>   | Agreed   |
| 6 | That the current eligibility policy be restructured and simplified by dividing eligibility types into two categories: <ul style="list-style-type: none"> <li>a) entities for which there is an appropriate accreditation/registration authority; and</li> <li>b) entities where there is a need to rely on warranties and references as there is no appropriate accreditation/registration authority.</li> </ul> | Yes. But as mentioned, ELICOS is not an RTO but is registered with ASQA  |
| 7 | 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:   | Agreed   |

| #  | Recommendation   | Response  |
|----|--|---|
|    | <ul style="list-style-type: none"> <li>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</li> <li>b) providing a reference in a standard form from an unrelated entity that currently holds an edu.au licence where the reference: <ul style="list-style-type: none"> <li>i. warrants that the referee is an eligible entity under current policy and holds a current edu.au domain name licence; and</li> <li>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.</li> </ul> </li> </ul> |   |
| 8  | <p>That eligibility policy be amended to:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b) remove references that research organisations need to be in receipt of funding;</li> <li>c) provide examples of the type of bodies that fall within the category of national bodies;</li> <li>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.</li> </ul>   | Agreed  |
| 9  | <p>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.</p>  | Agreed  |
| 10 | <p>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.</p>  | Yes - if there is already a requirement to be registered by a relevant authority - the Registrar should not need to duplicate this. |
| 11 | <p>That no policy change is required in relation to the current allocation rule '<i>first come, first served</i>'.</p>   |   |

| #  | Recommendation   | Response |
|----|--|----------|
| 12 | That no change is required to the policy rules controlling the level of edu.au domain name that different applicant types can register.  |          |
| 13 | 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.   |          |
| 14 | 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.  |          |
| 15 | 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.   |          |
| 16 | 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. |          |
| *  | Are there any other issues regarding edu.au domain governance arrangements or domain name eligibility or allocation rules that you wish to raise?  |          |