

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

Name of organisation or person submitting this response	DevelopMental Pty Ltd
Date Submitted	24 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.	I generally support the existing processes
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.	I agree that higher ed requirements may need review once the changes to the environment are clear
3	That no changes be made to the registrar arrangements for the edu.au domain.	It seems to have worked acceptably to date
4	That the current interim governance arrangements be confirmed as appropriate for the edu.au domain.	
5	That a formal, published pricing policy be established where: <ul style="list-style-type: none"> a) The objective is to keep the fees for an edu.au domain name licence at a minimum; and b) Pricing is subject to regular review, including periodic external independent scrutiny. 	Both appear reasonable
6	That the current eligibility policy be restructured and simplified by dividing eligibility types into two categories: <ul style="list-style-type: none"> 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. 	I support part 1, though would like part 2 to be rigorously managed
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:	I don't really support non accredited organisations being endorsed with edu domains

#	Recommendation	Response
	<ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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. 	
8	<p>That eligibility policy be amended to:</p> <ul style="list-style-type: none"> 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; 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. 	These clarifications seem suitable
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>	Supportive of this
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>	Don't support this
11	<p>That no policy change is required in relation to the current allocation rule '<i>first come, first served</i>'.</p>	Accept this as long as the applied for name does reflect the organisation name

#	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.	There should be a limit to names that are reflective of the business name
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.	Agree
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.	Must be a link
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.	Accept
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?	Nil