

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	Safecity Services Pty Ltd
Date Submitted	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.	<p>I oppose this statement vehemently on the following grounds</p> <ol style="list-style-type: none"> 1. The current administrators of the edu.au domains charge exorbitant fees and offer a substandard platform in return and no services. In a real commercial world this organization would have no customers and be forced into bankruptcy. However, because the Government has created a monopoly for this unsavory lot they are able to charge whatever fees they wish and dismiss clients needs. 2. The staff responsible for approving the applications are ill mannered, unprofessional, arrogant and incompetent. They flagrantly violate new AUDA rules which have liberated the industry from unnecessary restrictions and limitations. 3. The current system brings no benefit to the educational organizations and to the Australian education system in general. It is faulty, nepotistic and absolutely unacceptable.
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.	<ol style="list-style-type: none"> 1. Allow more than one organization to administer the domain names. 2/ Establish a tender for the selection of the approved organizations. The tender panel must comprise of a mixture of stakeholders to avoid the nepotistic behaviour that is rampant at this time. 3. Fall in line with AUDA's new guidelines pertaining domain names allocations. Australia has only recently raised its standards to meet the real needs of business and educational bodies -- rather than the draconian, antiquated, business-unfriendly rules and regulations that it formerly adopted. The edu.au has refused to fall in line with the new guidelines, 4. Establish a rating system so that the new regulators and the staff responsible for dealing with clients are evaluated on the principles of customer service and professionalism. The reviews must be studied and be used during the process or tender renewals.

#	Recommendation	Response
		<p>5. The immediate lowering of the cost of domains to match the .com domain names. The .com domain names can now be renewed at the wholesale cost of \$20 per two year. The .edu.au domains cost \$90. There is no reason why this outrageous price structure should be in place. In many cases educational organizations are operating in financial difficulties due to government cuts and funding cuts and increased competition. I see no plausible reason other than greed for this behaviour. It is regrettable that this organization has been able to control the edu.au domain management for so long. I welcome the discussion paper. Hopefully this is not just another one of those "white papers" that only consume time and produce nothing of value. Thank you Alexander Wilson JP CEO</p>
3	That no changes be made to the registrar arrangements for the edu.au domain.	I oppose it.
4	That the current interim governance arrangements be confirmed as appropriate for the edu.au domain.	I oppose it.
5	<p>That a formal, published pricing policy be established where:</p> <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. 	<p>I welcome any changes to the pricing structures of the current edu.au domain names. They should fall in line with the current .com rates. At wholesale rate a .com name can be renewed for \$20 for two years. The current edu.au cost is \$90</p>
6	<p>That the current eligibility policy be restructured and simplified by dividing eligibility types into two categories:</p> <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. 	<p>I welcome any changes that will allow a registered training organization or educational organization to choose whatever name they see fit so that the domain will reflect activities and projects and their courses.</p> <p>This falls in line with the current commercial .com domain names. Corporate business can choose any name that matches their activity or closely match their business projects.</p> <p>The current edu.au system has not caught up with the new standards. Each auditor can come up at will with objections and refuse a domain name. On the other hand, the same auditor can grant the same name to a competing organization. The current system has allowed this nepotistic (if not fraudulent) behavior to take place since its inception.</p>
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:	<p>I welcome any change that will allow principals of registered training organizations to warrant the need for a domain name to be registered.</p> <p>Registered training organizations are subject to scrutiny and regular audits. The accreditation</p>

#	Recommendation	Response
	<p>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</p> <p>b) providing a reference in a standard form from an unrelated entity that currently holds an edu.au licence where the reference:</p> <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. 	<p>process for an RTO is pervasive and comprehensive.</p> <p>It is an affront to any principal of an educational organization or registered training provider to have an obscure staff member (who cannot be identified) to determine whether a domain name is appropriate or inappropriate.</p> <p>All my previous experiences with such staff have been toxic. On each occasion the denials were actionable in a court of law as they infringed my rights as a consumer.</p>
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. 	<p>Point 1. The eligibility must be based on the fact that the applicant is an accredited education organization or RTO. The applicant must be able to choose the domain name based on availability and if it relates to a project or course they are conducting. This in line to commercial .com domain registration policies.</p> <p>2. I welcome that change</p> <p>3. Educational organizations that are involved in the delivery of distance education programs must be able to register as national bodies. Not being able to do so will restrict their ability to trade and advertise their programs efficiently.</p> <p>4. Educational organization involved in the deliver of distance education programs such as OPEN and ourselves attract international clients and expat students. The "related services" term should ensure that the domain name fits the activity that the educational body intends to pursue within their scope.</p>
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>	<p>I support that</p>
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>	<p>I support that</p>

#	Recommendation	Response
11	That no policy change is required in relation to the current allocation rule <i>'first come, first served'</i> .	I support that
12	That no change is required to the policy rules controlling the level of edu.au domain name that different applicant types can register.	The domain name choice should fall within the same guidelines for commercial .com names.
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.	I support that
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.	I oppose this the domain name should reflect the activity that the educational organization wishes to promote. This enables domain names and sites to be set up for projects. This enables advertising and search engine optimization,
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.	I oppose that. The only restrictions that should apply are those to prevent abusive and unacceptable words.
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.	I am in favour for any change that prevents unlawful or unethical use of the edu.au platform. However, I wish to remind the panel that educational organizations are by a large ethical and professional.
*	Are there any other issues regarding edu.au domain governance arrangements or domain name eligibility or allocation rules that you wish to raise?	Other than changes must occur in order to align with the rest of the world and commercial practices. The current system is archaic and unnecessarily restrictive.