AusRegistry Pty Ltd

L8, 10 Queens Rd
Melbourne Vic 3004
Australia
ABN 18092242209
ACN 092242209

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eDAC Secretariat
via email: edac@stenning.com.au

Review of the edu.au Domain's Governance Arrangements and Eligibility and Allocation Policies

AusRegistry thanks the .edu.au Domain Administration Committee (eDAC) for the opportunity to provide a response to this review.

AusRegistry is the Registry Operator for the open 2LDs (asn.au, com.au, id.au, net.au and org.au), the community geographic 2LDs (act.au, nsw.au, nt.au, qld.au, sa.au, tas.au, vic.au and wa.au) and 2 closed 2LDs (edu.au and gov.au).

As the Registry Operator, AusRegistry has supported the edu.au domain since 2002. Whilst not part of the Australian education and training sector we offer a well-rounded perspective with respect to the domain name industry. This perspective has been formed over a number of years operating in the local and international market.

The eDAC review provides 'the opportunity to have input into improving the [.edu.au] domains' sustainability'. We have provided our response with this in mind.

Regards,

Maggie Whitnall
Senior Client Services Manager
AusRegistry Pty Ltd

1.   Review Questions

Is eDAC the most appropriate mechanism to manage the policy and administration of the .edu.au domain? Is it sufficiently representative of domain users? If not, why and what alternative mechanism should be considered?

We support eDAC to be the most appropriate mechanism to manage the policy and administration of the .edu.au domain.

With respect to the adequate representation of domain users, there is scope to incorporate representation from Education Services Australia (the edu.au Registrar), who could ably represent the Registrant perspective and provide valuable input into the formation of policy.

2.   Review Questions

Are the functions that need to be addressed by the edu.au domain's policy and .administration arrangements (as outlined in eDAC's Terms of Reference) appropriate? If not, why and what changes need to be made?

The functions that need to be addressed by the edu.au domain's policy and .administration arrangements (outlined in eDAC's Terms of Reference) are appropriate.

3.   Review Question

Are the current arrangements for an edu.au Registrar appropriate? If not, why and what changes need to be made?

Education Services Australia capably serves the education and training sector as the sole edu.au Registrar.

However, consideration may be given to the existing Registrar model that creates a single point of dependency and limits choice for Registrants. Registrants may benefit from a competitive market that delivers a varied service offering.

4.   Review Question

Is the current process for filling vacancies on eDAC appropriate? If not, why and what process could be considered?

AusRegistry has no position on this question.

5.   Review Question

Are four year terms for eDAC members appropriate? If not, why and what alternative term should be considered?

AusRegistry has no position on this question.

6.   Review Question

Is the current approach to domain name pricing in the edu.au domain appropriate? If not, why and what changes need to be made?

Given the edu.au namespace experiences minimal yearly growth, it is unlikely there will be scope to reduce pricing in the future - without affecting revenues. A growth strategy for the namespace could be considered, as one solution to reduce domain name costs to Registrants and increase service delivery benefits.

7.   Review Questions

What types of entities should be eligible under the following eligibility types?

a. Research organisation

b. National bodies

c. Non-profit associations

d. Entities not otherwise listed

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

8.   Review Questions

Are there other types of entities that should be eligible for an edu.au domain name?

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

9.   Review Questions

Are there other issues you would like to raise regarding the domain's eligibility types?

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

10.   Review Questions

Are the current eligibility rules appropriate for maintaining the integrity and sustainability of the edu.au domain?

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

11.   Review Questions
Should the edu.au domain eligibility rules be amended to allow for more, or less, types of entities to register edu.au domain names?

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

12.   Review Questions
If so, what types of entities should be allowed to register edu.au domain name licences? How should their eligibility for an edu.au domain name licence be established?

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

13.   Review Questions
Are there other issues you would like to raise in regards to the edu.au domain's rules for eligible entities?

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

14.   Review Question
Should the current rules relating to the registration of an edu.au domain name licence for a project or program be changed? If so, how?

We have provided a single response with respect to .edu.au eligibility.

Please refer to our Question 15 answer.

15.   Review Question
What types of related services should an entity deliver for it to be considered eligible for an .edu.au domain name?

This review identifies a number of competitive pressures facing the .edu.au domain namely the introduction of a number of generic Top Level Domains that will service the growing education sector and provide competing services.

With sustainability as a key objective of the .edu.au namespace eDAC may wish to consider broadening the eligibility criteria to include stakeholders of the education industry that do not otherwise meet the current eligibility requirements.

There is possible apprehension that relaxing eligibility will open the namespace up for abuse and erode its integrity, however auDA's management of the .au ccTLD is an example of how a considered and measured approach to policy change benefits a namespace.

By applying the proper mechanisms to protect Registrants i.e. through policy enforcement, the implementation of consumer safeguards, the facilitation of the .au Dispute Resolution Policy and regular industry reviews, the .au ccTLD continues to grow whilst maintaining its objectives of operational stability and enhancing the benefits of the Internet to the wider community.

The high number of rejected .edu.au applications indicates an otherwise engaged market however; applicants are likely to register in competing namespaces if they cannot work within the constraints of the edu.au zone.

The domain name system was invented to translate IP addresses into human-friendly and memorable names. Strict naming conventions limit usability of a domain name - long domain names with multiple levels are hard to remember and not user friendly.

eDAC may wish to consider widening the eligibility of the namespace to include any entity operating within the Australian education and training sector i.e. book sellers, uniform wholesalers, course providers etc. Just as with .au, the policy that underpins the stability and integrity of the edu.au namespace ensures that the appropriate actions can be taken against unscrupulous registrations.

16.   Review Question
Should the edu.au domain continue to allocate domain names on a 'first come, first served' basis? If not, what alternative allocation rule should apply?

Yes, the edu.au domain should continue to allocate domain names on a 'first come, first served' basis.

17.   Review Question
Should the rules controlling the level of edu.au domain name that different applicant types can register be changed? If so, how?

Please see response to eligibility above, Question 15.

18.   Review Question
Should the rules requiring that there to be a direct link between the name of the applying organisation (or related project or program) and the proposed edu.au domain name be changed? If so, how?

No, the rules requiring that there be a direct link between the name of the applying organisation (or related project or program) and the proposed edu.au domain name should remain.

19.   Review Question

Should the rules governing the types of words and terms that are restricted or that cannot be registered as an edu.au domain name be changed? If so, how?

Consideration may be given to allow for the registration of generic terms, but only where they directly relate to the education sector. For example, books, uniforms, stationary, teachers, students.

Generic terms are a valuable asset within a namespace and may be released at the determination of eDAC i.e. this may be achieved via auction or applying a higher yearly registration fee to generic terms.

The education and training sector is a competitive marketplace. Releasing generic names will provide opportunity to innovative entities introducing new services to students, teachers and schools. Importantly any revenue increases for the edu.au namespace will allow for future re-investment back into the Education and Training sector.