

To the eDAC Secretariat

## Input to the Public Review of .edu.au Domain

Thank you for the opportunity to contribute to the public review of the .edu.au domain.

The Council of Australian University Directors of Information Technology (CAUDIT), with input from its members, provides the following comments for your consideration.

Please note that member's views vary slightly and this is reflected in the comments.

### Review Questions

#### Question 1-5

- 1. 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?**

Yes. Whilst the current arrangements are acceptable, some tightening of the criteria may benefit the public. This is a good model to represent the needs of the stakeholders.

A number of universities commented that the addition of a second Higher Education Sector representative would be of benefit to eDAC as the higher education sector seems a little under-represented given its student population – with only one member. An additional representative for universities that may find registration of a TLD names unaffordable would be a suggested alternative to providing broader representation. Some universities may be less likely to hold TLD names and have a greater commitment to the edu.au domain.

Universities provide the highest level of education and need to ensure that their online presence is delivered via a legitimate and valued namespace to their users. Universities also face recent changes to deregulation of student fees, introducing added competitive pressures and the need to rely on a stable and trusted internet brand.

If changes to the administrative arrangements are proposed, these would be supported if it was evidenced they would benefit the long term viability of the restricted edu.au domain.

- 2. 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?**

Yes.

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

On the positive: Yes they are generally appropriate. Keeping a single Registrar is a key factor to ensuring dedicated focused support for the sector. It helps guarantee that registered bodies are accredited and approved correctly.

It is recommended though that the assessment of applications be strengthened to ensure that applications are only accepted from authorised representatives within each entity. Additionally, there needs to exist a reporting function back to each entity, to enable auditing of domain names.

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

Yes.

In combination with Universities Australia the preferred peak body for the nominations of eDAC stakeholder vacancies for higher education could include full members of the Council of Australian University Directors of Information Technology (CAUDIT).

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

Regular refresh of members is welcomed and an appropriate duration. If no other appropriate nomination is made, the outgoing member should be given the option of continuing for another term. There is support for indefinite terms to be abolished and 4 year terms introduced.

**Question 6-10**

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

Yes, The current pricing is appropriate however further reductions in fees are not a primary need. Would a body registering a domain find a \$90 fee too onerous and prefer to take on a cheaper domain? If this is the case, this body may not be a preferred candidate for the namespace. Remaining competitive with commercial domains should not be a requirement for pricing, but rather focus on maintaining the integrity and quality of the namespace entities.

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

**a. Research organisation**

- Research entities directly linked to a higher educational institution and the curriculum or programs the institution offers.
- The criteria around Research organisations is insufficient. It is recommended that this be changed from:  
“Applicants must provide a warranty showing that they are receiving funding from an appropriate research authority or organisation.”  
“The Registrar may ask the applicant to support their application with references from up to three current licence-holders in the edu.au domain space.”  
to:  
“Applicants must provide a warranty showing that they are receiving funding from an appropriate research authority or organisation, and The Registrar must ask the applicant to support their application with references from up to three current licence-holders in the edu.au domain space.”
- Educational research entities

**b. National bodies**

- Student entities
- Teacher entities

**c. Non-profit associations**

**d. Entities not otherwise listed**

The current rules for b, c and d type are sufficient.

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

No. There are no other entities that we think should be considered eligible for an edu.au domain name.



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

Yes.

The eligibility criteria for higher education applicants should be changed from  
"Applicants must be established under Australian legislation or approved to provide higher education by a relevant accreditation authority."

to

"Applicants must be established under Australian legislation or approved to provide higher education by a relevant accreditation authority and nominate up to three (3) authorised representatives."

The issuing of domain names to projects or programs should be strengthened – and projects should be permitted domain names only when they are associated with a corporate entity.

The provisions to allow "Entities not otherwise listed" (p15 of the Issues Paper) to register an edu.au domain based on the endorsement of three other domain holders seems incongruous with the other assessment criteria. We recommend that any applicant must prove their primary function is the provision of education, training or research services in Australia. If the result of tightening the eligibility criteria is that the costs of the domains increases, then that is a trade-off we are comfortable with.

The use of the edu.au namespace for childcare centres does not seem appropriate; unless they are an accredited pre-school, in which case they would qualify for a fourth level domain.

The use of the term "related services" in the assessment criteria, which allows government departments and other entities that do not deliver actual educational services to use the edu.au domain, should also be removed, as it dilutes the clarity and confidence associated with the domain.

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

No.

There is flexibility in the current eligibility rules that allow less legitimate bodies to register edu.au domains. The current rules require a degree of strengthening to ensure the integrity of the domain space.

**Question 11-15**

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

Fewer entities to ensure appropriate candidates are registered within the namespace is recommended however some members feel that the rules as they stand are sufficient.

**12. 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?**

Only entities registered with the relevant accreditation authority be eligible to register an edu.au domain. Per responses 3 and 9, the eligibility of applicants should be established by the criteria for each type, and by application from an authorised representative from the entity.

The integrity of the domain is of a higher priority than increasing "financial stability" – this would seem to be a captive market in the core customer base (educational institutions) and so fluctuations in this subset of



customers should be fairly small. Integrity of the domain is important to retain user's confidence in .edu.au in light of increasing security concerns.

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

Each organisation should have a list of authorised representatives who can request domain names for eligible entities. All other requests from that entity should be referred to those representatives.

**14. 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?**

No, the current rules for project and program applicants should not be changed.

As per 13. each organisation should have a list of authorised representatives who can request domain names for eligible entities. All other requests from that entity should be referred to those representatives.

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

Entities should provide and deliver educational services directly related to the needs of its students.

**Question 16-19**

**16. 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, a 'first come, first served' basis should apply providing they firstly meet the eligibility criteria.

The use of a trademark of name should NOT be permitted unless that trademark or business name reflects the requestor. In this case, the current "first come first serve" could result in domain name speculation, competitive behaviours – or in the worst case potential misrepresentation.

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

No, the rules controlling the levels of edu.au domains should remain and be strengthened to ensure that additional levels of domain name are from approved representatives of each entity.

There is no public benefit to relaxing these rules, and there is a real possibility of undermining the integrity of the edu.au domain.

**18. 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 composition of domains and direct link rules should be maintained to minimise any likely confusion. It also ensures institutions don't register numerous domains that are not related to their key purpose and prevent any type of domain name speculation. As pointed out in the issues paper, the registering of generic words in domains for search engine purposes can unfairly advantage one entity over another, which goes against the principle of a trusted domain for the public, and could in the long term cause search engines to lower the overall rank of the domain.



The eligibility guide on the domainname.edu.au website is a great tool to help clarify if a body is eligible; it makes it clear and easy to understand.

**19. 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?**

The current rules are sufficient.

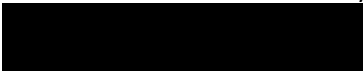
**GENERAL COMMENTS:**

A frequent comment was that the integrity of the domain should be protected with firm controls being maintained, rather than seeking larger customer base to “maintain financial stability”.

Thank you for the opportunity to provide feedback to the Review.

If you would like further information or to explore any of these comments, please contact:

Anne Kealley  
Chief Executive Officer  
Council of Australian University Directors of Information Technology (CAUDIT)



or

Michael Kirby-Lewis  
President  
Council of Australian University Directors of Information Technology (CAUDIT)

