



S P Jain
School of Global
Management

DUBAI • SINGAPORE • SYDNEY

eDAC Secretariat
GPO Box 881
HOBART TAS 7001
By email edac@stanning.com.au

25 September 2014

Dear Secretariat

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

The S P Jain School of Global is grateful for the opportunity to provide a response to this issue paper. Our responses to each review question, where we wish to make comment, are below:

- (1) We suggest the removal of the higher education sector representative, and the addition of one university representative and one non-university higher education provider (NUHEP) representative. Universities and non-universities are currently governed separately in the .edu.au policy framework. Having just "one representative from the higher education sector" is non-representative of the industry and may give rise to conflicting interest depending on the background of that particular representative. We assume similar reasons explain the presence of government, catholic and independent school representatives on the committee.

- (17) Rules controlling the level of .edu.au domain name are unfair in their current state. Firstly, they fail to make any reference to NUHEPs, which are neither universities, TAFEs nor RTOs. This makes the policy difficult to apply to NUHEPs.

Restricting use of the third level domain to "applicants that have national interests and responsibilities", and listing universities as an example, is inequitable to NUHEPs. We assume that universities are considered to have "national interests" because they are required to undertake scholarly research. However many private higher education providers, ourselves included, also engage in research. Yet we are deemed ineligible for the third level domain by virtue that we do not have the word "university" in our names.

All higher education providers, both universities and non-universities, are registered by the same Australian accreditation authority, namely the Tertiary Education Quality and Standards Agency (TEQSA). This is a nationally-based body, and the States no longer hold any responsibilities for the registration and accreditation of higher education providers. Registrations under the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) are also

SYDNEY CAMPUS:

S P JAIN SCHOOL OF GLOBAL MANAGEMENT PTY LIMITED

5 Figtree Drive, Sydney Olympic Park, NSW 2127, Australia

Tel: +61 (02) 8970 6800 Fax: +61 (02) 8970 6280

ABN: 87 136711 567

CRICOS Code: 03335G

Visit us at www.spjain.org



controlled by TEQSA, and no longer state education departments. We are therefore of the opinion that all TEQSA-registered higher education providers should be eligible to use the third level domain.

According to Policy 1, “state and territory based applicants must be registered at the fourth level”. However, there is no longer any such thing as a state based higher education provider because they are all registered at the national level. If this section of the policy is related to where applicants *operate*, than again there are issues of fairness given the vast majority of universities operate in single states only. We therefore reiterate our recommendation that all higher education providers should be eligible to use the third level domain.

The URL used by any organisation has the potential to affect the reputation of both the individual company and the industry. Hence we support in its entirety the robust governing principles of eDAC in maintaining the integrity of the .edu.au domain. However restricting the use of the third level domain for NUHEPs is anti-competitive and provides an unfair advantage to universities. This is due to the apprehension of prospective students when they compare a provider using the .nsw.edu.au domain, for example, compared .edu.au. Prospective students perceive that inclusion of the state prefix imparts some form of limitation on the provider, even though that provider would be nationally registered and controlled like all others.

Australia’s higher education sector is recognised as one of the best in the world. As all higher education providers are regulated in the same way, they all should be entitled to use the third level domain representing the country, and not the state, in which they operate. For an institution like ours that attracts many overseas students – contributing to Australia’s third largest export of international education – our web addresses need to clearly reflect that we Australian entities and not state-governed. Prospective overseas students are hardly likely to know about Australian state prefixes contained in URLs. This is likely to make them apprehensive about choosing that provider, again diminishing competition. People from all over the world see our URLs and hence they need to be accurately and fairly assigned.

For the information of the review committee, there are currently 186 registered higher education providers in Australia, consisting of 43 universities and 143 non-universities¹.

We look forward to hearing the outcomes of the review and would be pleased to expand on our submission to the review committee if required.

Trent Pohlmann
Head of Campus - Sydney

¹ <http://www.teqsa.gov.au/national-register/search/provider>

SYDNEY CAMPUS:

S P JAIN SCHOOL OF GLOBAL MANAGEMENT PTY LIMITED

5 Figtree Drive, Sydney Olympic Park, NSW 2127, Australia

Tel: +61 (02) 8970 6800 Fax: +61 (02) 8970 6280

ABN: 87 136711 567

CRICOS Code: 03335G

Visit us at www.spjain.org