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To: Lujia Chen  
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## Review of .au Policy Framework

The Internet Society of Australia (ISOC-AU) welcomes this opportunity to respond to auDA's draft recommendations in its review of its policy framework.

ISOC-AU's fundamental belief is that the Internet is for everyone. We provide broad-based representation of the Australian Internet community both nationally and internationally from a user perspective and a sound technical base. We also consistently promote the availability of access to the Internet for all Australians. Our submission is made from the perspective of the Internet users, which include individuals, groups and organisations that are impacted by the auDA Name Policy Framework.

In our view, Domain Names should be viewed as a public resource to be managed in the interests of Internet users including individuals seeking access to Internet sites and registrants providing those sites.

We largely support the draft recommendations proposed in the auDA paper of May 2011, with the following additional comments:

### **1B QUESTIONS a. Should informal clubs and groups be allowed to register within org.au?**

#### Additional Response

We support clearer criteria for clubs and groups that include the following:

- Demonstrated membership;
- Clear, articulated objectives that the membership has subscribed to and that have a close and substantial connection with the proposed domain name; and
- Evidence of membership activity to implement the agreed objectives.

The applicant organisation should be required to warrant that the agreed criteria are complied with, and should the organisation, on request of auDA, not provide evidence of compliance with the agreed criteria within a short period of time, the domain name could be withdrawn

### **1E QUESTIONS a. Should a registrant be allowed to lease their domain name to another entity? b. If so, under what circumstances?**

#### Additional Response

Again, we have a real concern with this suggestion. Any domain name must meet the close

and substantial policy rule and be bound by the auDA Registrant Agreement. Our concern is principally that permitting a registrant to delegate its auDA policy compliance obligations to a lessee (as is common in other types of leases) in effect means that the registrant rather than auDA becomes the policy authority for that domain name. Therefore, we stress that, if a domain name is to be the subject of a lease, we recommend that the registrant remain primarily responsible for compliance with all relevant auDA policies.

**1G QUESTIONS a. Should individuals be able to register domain names that relate to a personal hobby or interest? b. If so, how should the eligibility criteria be changed to accommodate this type of domain name?**

Additional Response

We originally suggested that this category of potential registrants could be accommodated under an expanded .org TDL. However, the recommendation suggests that the 'close and substantial' rule should be relaxed to do so. Rather than suggest that the rule be 'relaxed' we suggest that the rule be amended so that the rule will still apply in situations where an individual has a demonstrated interest in or involvement in that hobby or interest.

**3 QUESTIONS a. What do you understand by the term "domain monetisation"? b. Should domain monetisation continue to be subject to specific regulation? c. If so, how could the Domain Monetisation Policy be made more workable? d. If not, would the general Policy Rules offer sufficient safeguards to deal with bad faith registrations by domainers? e. Should domain monetisation be permitted in the non-commercial 2LDs (asn.au, id.au and org.au)?**

Additional response

Again, ISOC-AU recognises the difficulty arising from the definition of domain monetisation. However, the existing rules still serve to give both potential registrants and Internet users some guidance on domain names. That is, there should be a clear and substantial link between the name and the site content and Internet users should not be diverted to websites that do not offer a real service or information.

We will be happy to provide any further comments on issues raised by our NBN submissions.

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