



Internet Society of Australia
A Chapter of the Internet Society

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To: ICANN

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ISOC-AU SUBMISSION: to ICANN DOMAIN TASTING INITIAL REPORT

The Internet Society of Australia (ISOC-AU) is a non-profit society founded in 1996 which promotes the Internet development in Australia for the whole community. ISOC-AU is a chapter of the worldwide Internet Society and is a peak body organisation, representing the interests of Internet users in Australia. We have a longstanding and ongoing commitment to the effective representation of these interests in self-regulatory processes in the telecommunications, domain name and Internet-related services industries.

ISOC-AU has read with some concern both ICANN's Issues Report and Outcomes Report on the practice of domain tasting, particularly its significant increase over the past few years. We note the suggested benefits of domain tasting, which largely accrue either to individual registrants and/or to individual registrars. We believe those suggested benefits are far outweighed by the disadvantages of domain tasting, as identified in both ICANN reports, including the following:

- the potential impact on the stability of the gTLD name space and potentially on the entire DNS;
- the potential for consumer confusion
- the potential increased costs and burdens to legitimate registrants
- the potential for facilitation of trademark infringement; and
- the added difficulty for law enforcement agencies to access records and pursue cases of criminal activity.

Both reports identify actions that can be taken to stop the practice of domain tasting, which focus on two areas. The first is a change to the rules on the At-Grace Period (AGP) including its elimination entirely or its elimination together with the introduction of other mechanisms to deal with legitimate errors. The other area of suggested action is the introduction of a charge of some sort for all names registered, whether or not they are deleted within the AGP. This could be an administration fee for the registration of every name, or for the deletion of every name, either above a set number and/or within a set time period.

We believe that the practice of domain tasting should be curtailed, and support any measures that ICANN believes will be effective in stopping the practice. We welcome ICANN's very recent decision on charging, which may eliminate the practice. However, we would urge ICANN to monitor the effectiveness of its new charging regime and, if the practice continues, take what ever other steps are necessary to minimise, if not eliminate domain tasting.