



Jo Lim
Chief Policy Officer
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Question: 'Should it be acceptable under the close and substantial connection rule to register domain names for the primary purpose of domain monetisation?'

Dear Jo,

As Chief Operating Officer of registrar Domain Central, I state that our position on this matter is in favour of domain monetisation.

I don't believe that it is necessary to explore the virtues, good or bad, for the practice of Domain Monetisation in detail.

The question clearly asks whether it be acceptable under the close and substantial connection rule to engage in this practice, and my response is, "yes, it most definitely is acceptable".

Domain monetisation relies entirely on "type in" traffic also known as "direct navigation" traffic. The business provides end users that prefer this type of navigation a service by providing search results and click through links relevant to their original search.

It is estimated that direct navigation traffic "accounts for nearly 10 percent of the global paid search market, which is projected to soar from \$9 billion this year to \$23 billion in 2009."*

** Masters of their Domains, Paul Sloan (Business 2.0 Magazine)*
http://money.cnn.com/magazines/business2/business2_archive/2005/12/01/8364591/index.htm

I don't believe we should entertain the idea to restrict Australian entities from participating in such a globally lucrative market. The com.au and net.au name space is for "commercial purposes", and unless it is legislated that monetisation is not a legitimate business then the entire discussion is pointless.

Yours Sincerely

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