



## **New Second Level Domains In the Australian DNS**

### **General**

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Cable & Wireless Optus Ltd (Optus) welcomes the opportunity given by .au Domain Administration Limited (auDA) to comment on its Public Discussion Paper on "New Second Level Domains in the Australian DNS". Since Optus provides Internet Service Provider (ISP), Internet Backbone Access Provider (IAP), & Carrier services in Australia, the auDA proposals are likely to significant impact upon its services, networks & IT systems.

A number of important issues have been raised by auDA's Name Policy Advisory Panel regarding the creation of new Australian second level domains (2LDs) and Optus hopes that its submission will assist auDA in resolving these key issues.

Optus comments on 2 key questions raised in the auDA Discussion Paper are listed below:

#### **1 – What criteria should we use in considering new 2LDs ?**

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While the auDA paper has highlighted several important selection criteria for new 2LDs, Optus suggest that auDA should also include an **additional** criteria listed below:

**“Commercial Impacts** - auDA needs to assess the commercial and business impacts of introduction of new 2LDs on existing Equipment Vendors, ISPs, IAPs & Carriers in Australia consultation with the industry. This would assist in assessing feasibility & realistic timeframe of introduction of any new 2LD in Australia.”

#### **3 – What new 2LDs should be introduced ?**

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Optus is deeply concerned about the possible introduction of the **following new 2LD** in auDA's paper:

**“Telephones and email** - *It has been suggested that a domain which simply permitted entities to establish a telephone number as a domain name would be useful. The Panel notes the work of the Internet Engineering Task Force (IETF) in relation to mapping of telephone numbers into the DNS to enable the implementation of a telephone number-based Internet directory system. The same principle might be applied to email addresses, ABNs and other numbering systems.*”

Optus believes that auDA's proposal to consider introduction of this particular new 2LD is premature as it is not feasible to presently implement the same by Equipment Vendors, ISPs, IAPs & Carriers in Australia because of the following reasons:

1. The IETF RFCs relating to mapping of E.164 telephone numbers into the DNS are still in Draft stage and are yet to be finalised.
2. Significant international coordination is required by auDA on resolving key deployment questions like introduction timeframes and on whether Australia will develop its own .e164.au or follow the IETF proposed e164.arpa. or the ITU proposed e164.int. or some combination.
3. Currently on the demand side, there are very few VoIP telephones and IP Voicemail based systems deployed worldwide- and particularly in Australia. There are also major Australian customer business impact issues like migration paths from existing base of non-IP PABX systems to VoIP based PABX systems.
4. Introduction of this new 2LD is likely to involve major technology changes on Equipment Vendor ( Handsets & PABX), ISP, IAP & Carrier platforms as well as Australian Government policy changes on E.164 Telephone Number allocations & Number Portability.
5. This may also entail significant work within the Australian industry in terms of possibly some new Inter-Carrier Standards & Codes- as well as updates to existing Interconnection Dial Plans by Australian Communications Industry Forum (ACIF).
6. The likely commercial impacts on Australian industry for implementing this new 2LD are yet to be assessed and are likely to be significant.
7. There is a need for auDA to keep an eye on international developments and only consider introduction of this particular 2LD in Australia, once sufficient testing and deployment has been carried out internationally to weed out any software bugs. This would ensure better acceptance of the new 2LD by Australian customers.

Optus has no comments at this stage on the other 3 questions raised in the auDA Discussion Paper.