



Ms Jo Lim
Secretariat
Name Policy Advisory Panel
Competition Model Advisory Panel
Australian Domain Administration Limited
GPO Box 1545P
MELBOURNE VICTORIA 3001

Dear Ms Lim

SETEL Submission: Response to auDA Public Consultation

This Submission responds to auDA's public invitation for comment on recommendations in the following Report: Changes to Domain Name Eligibility and Allocation Policies in .au Second Level Domains: Second Public Consultation Report, Name Policy Advisory Panel, February 2001
<<http://www.auda.org.au/panel/name/papers/publicreport2.html>>.

SETEL is an independent national consumer organisation representing and advancing the interests of small business telecommunications and electronic commerce consumers in national fora. SETEL's members are mainly industry, trade, commerce and professional associations servicing Australia's small business sector. SETEL's membership includes 55 associations (see Attachment A), which collectively represent around 500,000 Australian small businesses. More detailed information about SETEL is at <<http://www.setel.com.au>>.

Australia's 950,000 small businesses are major consumers of telecommunications, e-commerce and electronic addressing services -- notably fixed and mobile telephone numbers, Internet Protocol (IP) addresses and addresses derived from second level domain names.

The policies and models that emerge from the current auDA review processes should serve the long-term interests of Australian small business, as the largest group of end-users. Whilst most of the Panel's Recommendations should serve their interests, some will not.

From SETEL's experience over almost a decade of small business consumer representation in national fora, it would now seem appropriate for the Panel to translate its policies into a set of operational rules and codes of practice which will govern the day-to-day operations of the domain name services industry and market.

This submission was written by Ewan Brown, SETEL's Executive Director, and Ian

Johnston, SETEL Policy Consultant and Member of the Names Policy Advisory Panel. The views in this submission are those of the writers and not necessarily those of SETEL member associations. However, these views are based on an understanding of the business needs of Australian small businesses, as conveyed by SETEL member associations over many years.

SETEL informed its members of auDA's invitation to comment on the abovementioned Report and encouraged member Associations to respond direct to auDA. SETEL will continue to encourage member Associations to join auDA, participate in auDA Panels and contribute to the development of policy and self-regulation.

This Submission can be treated as public information and published on the auDA website.

Yours sincerely

Ewan Brown

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26 March 2001

SETEL Submission: Response to auDA Public Consultation Report

Introduction

Australian Governments believe that Australian small business is well placed to take advantage of electronic commerce opportunities. However, many small businesses have been relatively slow in accessing the Internet and using electronic commerce to conduct business. The barriers to the adoption of electronic commerce are manifold and substantial. This is a matter of some concern to these Governments which are pursuing a range of strategies directed to encouraging small businesses to access the Internet and begin electronic commerce, however basic.

Telecommunications, information and electronic addressing infrastructure and services play a pivotal role in the Australian economy, financial and payment systems and the Internet. Advanced telecommunications, and electronic commerce over the Internet, supported by a stable and secure electronic addressing system, have the potential to fundamentally change the way Australian small businesses operate and, in turn, to improve their profitability and prospects of survival in an increasingly competitive global economy. The Domain Name System is an integral and increasingly important part of the electronic addressing system.

The Federal Parliament has enacted legislation giving the Australian Communications Authority powers to safeguard the public interest in the management of electronic addressing services, such as Internet domain names.

Importance of Small Business, Electronic Commerce and Domain Names Licences

Australian's 950,000 small businesses contribute significantly to the Australian economy. They are major sources of economic growth, employment, income, trade and entrepreneurship. They comprise 95% of all enterprises in the private sector, account for more than 55% of private sector employment and, as a whole, contribute most of the private sector employment growth.

Most small business managers are pre-occupied with business survival, with a vision tightly focused on the short term, and with profit, tax, competition and regulation requiring most of their attention. They now face the challenges of global competition, new business opportunities, Australian taxation reform, including the Goods and Services Tax, and a need to understand and integrate advanced telecommunications and electronic commerce technologies and services into their business operations.

Electronic addresses -- including IP addresses and those derived from domain names -- underpin these technologies and services and are critical to the conduct of small business e-commerce in the global information economy. Stability and security tenure over domain names and domain name licences are fundamental to the day-to-day operations of these businesses.

SETEL notes from the Panel's Report that a domain name licence is a contract

between an applicant / licence holder and a registrar setting out the terms and conditions relating to the use of a domain name.

However, a domain name licence is much more than a contract. A domain name licence provides a small business with rights to use a domain name address -- an easily remembered strings of alphanumeric characters that can be used to resolve (i.e. translate) Internet Protocol addresses via a global network of nameservers.

A domain name licence also provides holders -- predominantly Australian small businesses -- with the right to create a set of electronic addresses for the purposes of carrying on business. This set may contain a small or very large number of addresses. The longer a business operates in a networked electronic environment the greater the number of addresses it will create and depend upon.

For example, for a small business such as SETEL, the following electronic addresses are derived from its domain name licence and created by its Internet Service Provider. These addresses enable a range of business related services:

- domain name - setel.com.au
- web addresses, <http://www.setel.com.au>
 - sub-webs, eg. <http://www.setel.com.au/sbc>
 - webserver statistics
 - search engine statistics
 - security tokens
- file transfer protocol addresses, eg. [ftp.setel.com.au](ftp://setel.com.au)
- email addresses, eg. setel@setel.com.au
 - associated with mailboxes for staff, consultant and stakeholder addresses, eg. aname@setel.com.au and news@setel.com.au
 - associated with mailing list addresses - mailinglist@setel.com.au
 - associated with subscriptions to mailing lists - eg. many current awareness services, alert services, discussion groups such as RegionalForum, DNS and ICA
- 3rd and lower level domain, eg. <http://www.shop.setel.com.au> and potentially a multitude of related electronic addresses.

Furthermore, by virtue of SETEL's permanent connectivity with the Internet -- a likely trend for many small businesses -- it has been allocated a set of IP addresses by its Internet Access Provider (IAP), which are used to identify terminal equipment and servers on the Internet.

The abovementioned electronic addresses support a range of business functions which closely integrates SETEL with its IAP, ISP and clients. These addresses are as essential to the functioning of SETEL's business, as its telephone numbers are. If SETEL's domain name licence were revoked or unavailable for any reason, this would create havoc for business and chaos for its clients, staff, consultants and stakeholders.

Electronic addresses derived from domain name licences are critical to the operations of many Australian small businesses and support mission critical operations and, therefore, domain name licences must be secured on a long term basis.

Revocation of domain name licences

Revocation or the threat legal action in pursuit of revocation of a domain name licence would impose significant costs on many Australian small businesses and potentially cause major business dislocation.

To achieve stability of domain names for an Australian small business, no domain name licence should ever to be revoked -- other than by operation of law -- as long as the business desires to retain the domain name licence.

However, it would appear that existing laws relating to registered and unregistered trade marks in Australia can and do prevail over domain name licences, with the consequence that holders of domain name licences are at risk of having their domain names revoked.

The domain name system needs to be supported by a predictable legal environment for Australian small businesses. That is, Australian small businesses must have confidence in knowing that their interests in domain names, domain name licences and derived electronic addresses are secure and stable over the life of the business.

To provide otherwise would be to expose Australian small business to unnecessary commercial risks and / or loss of confidence in industry self-regulation and the legal framework that supports electronic commerce.

In view of the above, SETEL has concluded that domain name policies and rules should be directed to minimising the risk and cost of:

- revocation of domain name licences held by bona fide Australian small businesses; and
- disputes between registered and unregistered trade mark owners on the one hand and bona fide Australian small business name holders on the other.

Approach to complaints handling

SETEL believes that an essential element of the domain name policy and service environment is an effective and robust complaints handling mechanism. To date the Panel has focused on a uniform dispute resolution procedure, which is seen by SETEL as only part, but nevertheless an important part, of a complaints handling mechanism.

There is a risk that in the "rush" to put in place a uniform dispute resolution procedure, sight might be lost of need for other key elements of a complaints handling mechanism. Customer complaint and dispute resolution procedures should be accessible, independent, fair, accountable, efficient and effective.

There are compelling arguments for a 'one stop shop' approach to complaints handling

from a consumers' perspective. A multiple complaints handling environment can be inefficient, burdensome and frequently frustrating for consumers, particularly small business consumers.

SETEL draws to the Panel's attention the Telecommunications Industry Ombudsman dispute scheme which provides a free and timely forum for the redress of consumer complaints, in contrast to costly and time consuming action in courts or consumer tribunals.

Specific comments on Recommendations

SETEL's position in relation to each of the following recommendations is set out below. These positions may change in the light of the ongoing work of the Panels and the inextricably related work of the Competition Model Advisory Panel.

SETEL notes the current advanced state of development of the names policy and competition model.

Accordingly, SETEL recommends that priority now be accorded to developing rules and codes of practice within which auDA, registrars, registries, small business and residential consumers and other stakeholders can operate.

In SETEL's experience, as a consumer representative for Australian small business, developing such rules and codes of practice "owned" and accepted by all key stakeholders can take considerable time and effort. The "devil" is in the detail.

3.1.1 There should be no restriction on the number of domain name licences that may be held by a single entity or individual.

SETEL Comment: SETEL supports this Recommendation. SETEL notes that other policies should effectively deal with cybersquatting, warehousing, hoarding and piracy of domain name licences, and any wrongful use of trade marks or trade names in domain name licences.

3.1.2 All domain name licences should be subject to a renewal period, to be specified by auDA, or by the relevant 2LD administrator subject to ratification by auDA. The domain name licence holder should be required to provide evidence of continued eligibility to hold the licence at the time of renewal.

SETEL Comment: SETEL does not support this Recommendation as worded.

SETEL is supportive of domain name licences being subject to renewal after a range of specified periods - from one year to say five years. SETEL does not support a single period licence, eg 2 years. SETEL would support:

- a minimum of one year licence period -- this would lower the financial barrier to Australian small businesses, notably the 750,000 micro-businesses, adopting e-commerce; and
- a range of licence periods enabling registrars to compete on price, possibly offering discounts for longer period licences (eg for residential consumers

choosing to purchase a 5 year licence). There would be a need for safeguards where consumers had pre-paid registration fees beyond, say, 1 year.

SETEL supports an obligation being placed on domain name licence holders to provide evidence of continued eligibility to hold the licence, only if it were evident to registrars or registries that a business registration (which provided the basis for licence eligibility) had lapsed or was not current.

It seems unduly onerous and burdensome on Australian small businesses with a current registration to require them to demonstrate eligibility, if that can be easily checked by registrars or registries. Internet Names Australia's application process for registration .com.au domain names appears capable of automatically checking a range of business registrations, including Australian Business Numbers, Australian Company Numbers and State Registered Business Names.

It would seem that the current status of such registrations could and should be regularly and automatically checked by registrars or registries to establish the continuing eligibility of domain name licence holders. In the event that a check raised a question of continued eligibility, then a licence holder would be obliged to provide evidence of continued eligibility to hold the licence.

3.1.3 In order to license a domain name in the .au domain space, the following conditions should be satisfied:

a. The domain name licence applicant must be an Australian entity.

SETEL comment: SETEL supports this recommendation.

b. The proposed use of the domain name licence must fit the purpose envisaged by the relevant 2LD. Schedule A lists the existing .au 2LDs and their purposes as currently stated.

SETEL comment: SETEL supports the current stated purpose of the .com.au domain: "For commercial entities, currently registered and trading in Australia". This is seen to be essential for the stability and integrity of the .com.au namespace.

c. There must be a declaration of a bona fide intention to use the domain name licence for the purpose envisaged by the relevant 2LD.

SETEL comment: SETEL supports this Recommendation in principle. However, SETEL reserves its position in view of the ongoing policy work by the Panel relating to:

- new Second Level Domains in the .au namespace; and
- treatment of generic and geographic domain names in the .com.au Domain.

d. A bona fide intention to use the domain name licence for the purpose envisaged by the relevant 2LD, should be demonstrated in accordance with the rules applicable in that 2LD. Schedule A lists eligibility criteria for current 2LDs.

SETEL comment: At this stage, SETEL does not support the inclusion of "Australian

registered trade mark applicant". SETEL notes:

- Anyone who claims to be the owner of a trade mark can apply for registration of that trade mark under the Trademark Act. This could be an individual, a company, an unincorporated club, an association or a partnership.
- Applicants must use, or intend to use, the trade mark in relation to the goods or services included in the application.

SETEL foresees ample scope for applicants of trade marks in Australia to use and test trade mark applications to obtain domain name licences that:

- would otherwise be on a restricted list of generic or geographic names;
- would otherwise be used by other businesses; or
- registered to Australian small businesses.

To provide protection of domain name licences registered to Australian small businesses that do not have a related trade mark, a likely outcome for many small businesses is an application for a registered trade mark in order to protect their domain name and domain name licence.

This will substantially add to the cost of obtaining a domain name, but nevertheless represents an prudent business strategy given the proposed direction and thrust of domain name policy which appears to give supremacy to the rights of trade mark owners over the rights of domain name holders. As noted above, a domain name is the basis of electronic addressing on which a business will be critically dependent. Australian small businesses adopting and engaged in e-commerce, need to be certain that they will not have their domain name licence revoked.

The application and registration fees for a registered trade mark in Australia, together with the long delays in processing trade mark applications (up to two years) represent a substantial barrier to the adoption and conduct of e-commerce by Australia's small businesses, particular many micro-businesses.

SETEL has noted the comments in the ACCC submission of 21 March 2001 to auDA relating to "Registration of Products and Services and Application of Trademark Law" and agrees with most of the ACCC's views.

SETEL has a fundamental concern about the tension between the rights of bona fide Australian small business domain name licence holders and the rights of registered and unregistered trade mark owners, and the way in which this might be managed and resolved in the event of conflict.

e. Purposes that would not be considered bona fide include but not limited to:

i. licensing a domain name for the sole purpose of selling it;

ii. licensing a domain name for the purpose of diverting trade from another business or website;

iii. deliberately licensing misspellings of another trader's company or brand

name in order to trade on the reputation of another trader's goodwill; and

iv. licensing and then passively holding a domain name licence for the sole purpose of preventing another (eg. an Australian Registered Trade Mark owner) from licensing it.

SETEL Comment: SETEL supports this Recommendation in principle. SETEL notes that the Recommendation is not limited to (i) to (iv). SETEL would be concerned, for example, if bona fide Australian small business transactions were not permitted. Small businesses wishing to sell or transfer their domain name licences, should be able to do so quickly and with minimum cost. SETEL can see no good reason why domain name licences should be treated differently from many other business assets or licences.

f. The domain name licence applicant must acknowledge at the time of application that their entitlement to a domain name may be challenged by a third party with superior legal rights in the words forming the domain name.

SETEL Comment: SETEL supports this Recommendation in principle. However, SETEL notes that for many Australian small business applicants to give a meaningful acknowledgement, they should be provided with material that explains, for example:

- the general circumstances that can led to revocation of a domain name licence, with particular reference to registered and unregistered trade marks;
- how the cost and risk of revocation can be minimised and managed; and
- what constitutes "superior legal rights in the words forming the domain name".

From a small business perspective, SETEL wishes to see:

- obligations placed on registrars to ensure that they disclose such material to domain name licence applicants -- mainly small businesses -- full and accurate material in timely manner;
- obligations placed on the agents of small businesses; and
- an industry funded education program targeted to Australian small businesses.

g. The domain name licence applicant must agree to be bound by any Dispute Resolution Procedure specified by auDA.

SETEL Comment: SETEL supports this Recommendation in principle, noting that it will apply only to applicants.

SETEL notes that this Recommendation is directed to applicants of domain name licences and not to current holders of licences. SETEL also notes that a submission by the International Trademark Association (INTA) dated 22 March 2001, recommends that all domain name license (open AND closed 2LDs) applicants and holders (retroactive) be bound by the auDA Dispute Resolution Procedure.

SETEL sees merit in Australian small businesses, which already have domain name licences, having the right to choose to not be bound by any new Dispute Resolution Procedure specified by auDA. SETEL supports a policy which would enable Australian small businesses to be subject to this policy on renewal if they so desire.

4.1.1 There must be a substantial and close connection between the domain name and the domain name licence holder.

SETEL Comment: SETEL supports this Recommendation in principle. SETEL notes that there are cost implications associated with this Recommendation, but that the benefits in terms the integrity and stability of the .com.au domain are likely to outweigh the costs.

SETEL believes there is scope for this policy to be developed. Whilst there is merit in there being a substantial and close connection between the domain name and the domain name licence holder in the .com.au domain, in other purpose domains this connection could be progressively relaxed. For example:

.com.au	very strong connection
.org.au	strong connection
.id.au	not so strong connection (evidence of name, but allow flexibility around same names)

4.1.2 A connection between the domain name and the domain name licence holder can be demonstrated if the domain name:

a. exactly matches the name on which the domain name licence application is based (eg. company name, trade mark, etc); or

SETEL Comment: SETEL supports this Recommendation in principle, but with reservations about the inclusion of applications for trade marks in Australia.

b. is a name by which the domain name licence holder is generally known (eg. an acronym, abbreviation, nickname or alias) or is otherwise derived from the name on which the domain name licence application is based.

SETEL Comment: SETEL supports this Recommendation in principle. However, SETEL would prefer that registration of all commercial domain names is based on registered names of one form or another.

4.2.1 Domain names that begin with a number should be allowed.

SETEL Comment: SETEL supports this Recommendation.

4.2.2 Two character alpha domain names that match existing or new country code top level domains (ccTLDs) should not be allowed. Domain name licence applicants should be advised that if they license a two character alpha domain name that is subsequently allocated as a ccTLD, then the licence may be revoked.

SETEL Comment: SETEL supports this Recommendation.

4.3.1 Until an appropriate licence allocation method has been devised, the licensing of generic domain names should be prohibited and following 'reserved

list' approach should be adopted:

a. a definition of the term 'generic' will be developed;

b. domain names that have to date been rejected by the current registrars for being generic will be placed on a reserved list;

c. new applications for domain names that may be considered generic will be referred to auDA;

d. if the domain name is determined by auDA to be generic then it will be added to the reserved list; and

e. applicants may challenge domain names on the reserved list, and auDA will determine whether the name should remain on the reserved list or whether changed circumstances mean the name can be licensed.

4.3.2 Until an appropriate licence allocation method has been devised, the licensing of geographic domain names should be prohibited, using the same reserved list approach outlined in 4.3.1 (substituting 'geographic' for 'generic').

SETEL Comment: SETEL does not support Recommendations 4.3.1 and 4.3.2.

SETEL supports the relaxation of the current policy of prohibiting the licensing of generic and geographic domain names. SETEL supports the licensing of generic and geographic domain names using an appropriate, market-based licence allocation system.

SETEL's views on were incorporated into the Panel's November 2000 public consultation report, and are repeated and developed below in response to Recommendations 4.3.1 and 4.3.2.

- These Recommendations would sustain gross misallocation of scarce and valuable domain name resources on a national scale.
 - For example, there are over 240,000 geographic names in Australia. Businesses operating in these locations, including many small businesses in regional and rural Australia, are effectively prohibited from accessing these domain names for e-commerce and other purposes.
- These Recommendations would sustain the inefficient and uneconomic use of valuable .au domain name space.
 - There would be a substantial negative effect flowing from implementation of these Recommendations, notably a significant opportunity cost to Australia as a nation. These scarce and valuable national resources might otherwise be used, shared and managed as a public resource in the public interest though, for example, a gateway system.
- Recommendation 4.3.1 requires a definition of 'generic' which would be difficult to devise and problematic to administer consistently across a range of competing registrars.
- The Recommendations are likely to give rise to disputes, particularly if

registered trade marks and applications for registered trade marks are permitted as a basis for domain name licence applications, and in fact assumes that this is likely by setting out a process for their resolution by auDA.

- The Recommendations have the potential to place a significant administrative and policy burden on auDA, leading to a likely increase in costs and time delays in the licensing of some domain names.
- The Recommendations do not address anomalies within the current policy, and could in fact perpetuate them.
- Recommendation 4.2.1 is silent on the issue of generic words in languages other than English, which may nevertheless be in wide use within Australia. To prohibit the use of foreign language generic terms would be logical and consistent, but completely impractical in a competitive environment and serve no good purpose.

In SETEL's view a policy which enabled licensing of generic and geographic names would have major advantages over the current policy and the proposed Recommendations:

- It would address significant issues and problems with the current policy, in particular the fact that the current policy is inconsistent across domains.
- Users and businesses wanting to access generic and geographic names -- because they are, easily remembered, intuitive, meaningful, well known or easily recognisable -- would be able to do so.
- It would address the misallocation of scarce and valuable generic and geographic domain names and enable the efficient and economic use of valuable .au namespace.
- It potentially enables the allocation of over 240,000 geographic domain name licences, thus providing e-commerce gateways for local businesses and services, particularly in regional and rural Australia.
- It would enable Internet users, for their own good reasons, to readily access a wealth of generic and geographic domain name hosted resources through browsers.
- It would enable auDA to diversify its funding base and to provide additional funding for its core activities in administering the .au domain system.

4.3.3 The licensing of objectionable domain names should be prohibited, using the same reserved list approach outlined in 5.3.1 (substituting 'objectionable' for 'generic').

SETEL Comment: SETEL supports this Recommendation in principle.

5.1.1 A limited number of new 2LDs should be introduced in .au domain space.

SETEL Comment: SETEL supports this Recommendation in principle. However, SETEL would be concerned if "limited number" were interpreted so narrowly that competition in the provision of domain names on competing 2LDs were restrained. SETEL would support the introduction of "chartered" 2LDs for organisations such as

associations and chamber of commerce and industry.

5.1.2 The Name Policy Advisory Panel will undertake a separate public consultation process to determine what the new 2LDs should be, and how they should be managed.

SETEL Comment: SETEL strongly supports this Recommendation.

6.1.1 Changes to domain name eligibility and allocation policies should not have retrospective effect for current domain name licence holders, and should only apply to existing domain name licences if the licence is re-registered to a different entity, or when the existing licence holder's licence expires.

SETEL Comment: SETEL supports this Recommendation in principle.

SETEL would be particularly concerned if new policies were to be applied to small business domain name licence holders on licence renewal. It is noted, however, that in some circumstances a small business may benefit from a new policy applying immediately or on licence renewal. There is merit in enabling small businesses to opt-in to a new policy.

Small businesses wishing to resell or transfer their domain name licences, should be able to do so quickly and with minimum cost. SETEL can see no good reason why for domain name licences should be treated differently from many other business assets or licences. Indeed, there may be circumstances where the transfer of a domain licences may well be in the interest of shareholders, creditors, liquidators and the public at large.

6.2.1 Dispute resolution procedures should apply to all open 2LDs, and to closed 2LDs on an opt-in basis, with appropriate modifications if necessary.

SETEL Comment: SETEL supports this Recommendation in principle.

6.2.2 Uniform dispute resolution procedures should be devised and implemented by auDA for all 2LDs before or at the same time as the recommendations of this Panel are implemented.

SETEL is not aware of any compelling reasons to "rush" into implementing uniform dispute resolution procedures ahead of the Panel's other Recommendations.

SETEL sees a need to develop an effective and robust complaints handling mechanism, which includes uniform dispute resolution procedures, and this will involve public consultation. The concept of a on-stop shop for complaints handling has considerable merit. SETEL would prefer to see a holistic approach to complaints handling, rather than a fragmented or piecemeal approach. See "Approach to complaints handling" above.

Associations

Association of Consulting Engineers, Australia
Australian Chamber of Commerce and Industry
Australian Industry Defence Network
Australian Council of Professions
ACT & Region Chamber of Commerce and Industry
Australian Hotels Association
Australian Petroleum Agents and Distributors Association
Australian Private Hospitals Association
Bus and Coach Association of NSW
Australian Retailers Association
Australian Society of CPAs
Chamber of Commerce and Industry (Western Australia)
Chamber of Commerce and Industry (WA) - South East Metropolitan Region
Council of Small Business Organisations of Australia Ltd
Electrical Contractors Association of WA
Employers' Federation of NSW
Franchise Council of Australia
Fremantle Chamber of Commerce
Furnishing Industry Association of Australia (NSW) Ltd
Hotel and Motel Accommodation Association
Housing Industry Association
Institute of Chartered Accountants in Australia
Institution of Engineers, Australia
Jewellers Association of Australia
Kwinana Chamber of Commerce
Licensed Clubs' Association of Victoria Incorporated
Master Builders Australia
Master Plumbers' & Mechanical Services Association of Australia
Motor Trades Association of Australia
National Electrical Contractors Association, NSW
National Rural Health Alliance
National Electrical and Communications Association
National Farmers' Federation
National Institute of Accountants
Northern Territory Chamber of Commerce and Industry
Pharmacy Guild of Australia
Printing Industries Association of Australia
Queensland Chamber of Commerce and Industry
Queensland Retail Traders & Shopkeepers Association
Real Estate Institute of Australia Ltd
Real Estate Institute of Tasmania
Restaurant and Catering Industry Association of Australia
Retail Confectionary and Mixed Business Association Incorporated
Rockhampton Chamber of Commerce
Small Enterprise Association of Australia and New Zealand
South Australian Employers' Chamber of Commerce & Industry Incorporated
Southern Districts Business Association

State Chamber of Commerce (NSW)
Tasmanian Chamber of Commerce and Industry Ltd
Timber Merchants Association (Victoria)
Tourism Council of Australia
Tractor & Machinery Association of Australia
The Victorian Automobile Chamber of Commerce
Victorian Employers' Chamber of Commerce and Industry
Western Australian Utilities, Electrotechnology & Printing Industry Training Council

Member companies and other organisations

AIPC Pty Ltd
Aquaspace Data
Australian Business Limited
Beda Ventures Pty Ltd
Business in the Community Limited
Butterworth Association Services
Cavill and Company Pty Ltd
Derby Enterprises
Roberts Real Estate, Eastern Shore
Solterbeck Jackson Marketing
Tasmanian Electronic Commerce Centre Pty Ltd
The Muecke Group
VME Systems
Woolcunda Proprieties
