

From: [David Wong](#)
To: [policies](#)
Subject: FW: auDA consultation: future second-level domains for .au - library.au / libraries.au
Date: Thursday, 25 July 2019 6:07:11 PM
Attachments: [image002.png](#)
[image003.png](#)

Dear auDA,

Thank you for the opportunity to provide feedback on the Digital Transformation Agency's proposal to reserve additional second level namespaces to supplement the existing .gov.au domain name structure. In particular, we note the proposal to reserve new 2LDs for potential use by libraries in a shared jurisdictional space: library.au and libraries.au

As a long-established Commonwealth government agency, the National Library's website, nla.gov.au, is a significant component of the Library's brand. It reinforces the Library's authority and reputation as a federal government agency with legally enforceable powers to collect and make accessible the country's documentary output. This authority enables the Library to fulfil its mandates in collecting Australian publishing output, as well as in collaborating with the national and international library communities and other cultural institutions. The Library has worked over decades to promote and maintain the reputation of the nla.gov.au domain, in both people's minds and within Internet algorithms, and we are unlikely to consider moving away from nla.gov.au to an alternative 2LD.

In addition, the National Library has been collecting online publications for over two decades. Government publications and websites are a priority for this collecting effort. That includes bulk harvesting of Commonwealth Government websites which relies on harvesting everything under gov.au. The Library's regular harvesting of the gov.au domain for the Australian Web Archive is the only archive of Commonwealth Government websites. The maintenance of harvest seed lists for the gov.au domain is already complicated by some government agencies using domains other than the gov.au including .com.au .org.au .org and .com. To introduce and encourage the use of other non .gov.au domains would greatly increase the difficulty in ensuring a record of Commonwealth Government websites is collected and maintained for the public record. A consistent second level domain (2LD) entity is one of the most critical elements in ensuring the effective scoping of archival harvests of web content.

As part of its mission, the National Library actively collaborates with other cultural and collecting institutions around the country, most notably through the Library's online Trove service at trove.nla.gov.au. However, the content accessible through Trove comes from a broad range of organisations, including museums, archives and galleries. Therefore moving to the proposed new second level namespaces would be misleading to the public, while bring a barrier for ongoing collaboration.

For any institution, supporting infrastructure on multiple domains will require additional resources. If new 2LDs are released, this will represent a net cost for us, as we will feel it may be necessary to establish a presence there, if only for the purposes of redirection.

In summary, it is the National Library of Australia's position that the existing .gov.au domain is most appropriate for the National Library's statutory mandate and purposes and we are unlikely to make use of the proposed new 2LDs. Other libraries around Australia may benefit from the

additional 2LD domains and we suggest you contact the Australian Library and Information Association to seek their views.

Thank you for the opportunity to comment.

==

David Wong
Chief Information Officer, Digital Group
National Library of Australia

