

Australian Vice-Chancellors' Committee

the council of Australia's university presidents

(A.C.N. 008 502 930)

Ms Jo Lim
Secretariat
auDA Name Policy Advisory Committee
GPO Box 424G
MELBOURNE VIC 3001

22 March 2001.

Re: auDA Public Consultation Reports February 2001

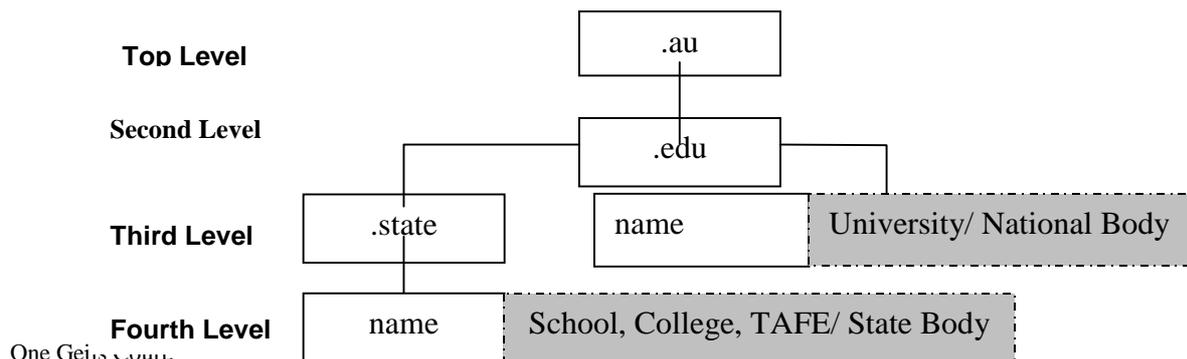
Dear Ms Lim

I refer to the auDA Public Consultation Reports which were recently released for comment. The Australian Vice Chancellors' Committee (AVCC) supports the general thrust of both reports, however it has specific concerns and positions with respect to some of the recommendations.

Importantly, the AVCC wishes to ensure that an opt-out option exists for edu.au for those proposals that are not necessary in or applicable to a closed domain and may impose unnecessary administration costs or impact on stakeholder requirements. As you are aware, the edu.au stakeholder consultation process has not been finalised so it is not possible at this stage to identify in entirety auDA proposals that may be a concern, however we believe there is value in providing early indication of our likely position.

In terms of policy formulation and authority, the AVCC expects auDA to delegate these for the edu.au domain to a duly constituted body that represents the interests of education stakeholders and that this will be the body currently being established under the auspices of the EdNA framework and receiving the support of State and Commonwealth Ministers of Education. This body would ensure a process of internal review and service quality assurance. Under the delegation, we would expect the body to manage the necessary sub-delegations within an agreed hierarchy.

The possible adoption of a hierarchical structure within edu.au would mean that some of the auDA policies are not necessary, especially at the third level and below. The edu.au domain has been well managed by Geoff Huston since 1984 and generally follows the structure below:



Names Policy Report

No restriction on number of domain name licences held by a single entity (ref 3.3.1)

This recommendation is supported but some regulation within edu.au may be needed to minimise administration costs if these are met centrally or on a sector by sector basis rather than per domain name.

Universities have interests in other domains including com.au and net.au (eg. commercial arms, joint ventures with industry and regional academic networks). The AVCC supports the auDA proposals with respects to these domains.

Renewal Period (ref 3.1.2)

This recommendation is also supported but a longer period may be sensible for edu.au due to the stability of educational organisations and the hierarchical structures within the domain. Annual renewal may add little value and could drive up the administration costs.

Licensing of geographic and generic names should be prohibited (ref 4.3.2)

Education may wish to take a more relaxed approach especially at lower levels (eg. state.edu.au)

Changes to domain name eligibility should not be retrospective (ref 6.1.1)

This recommendation is also supported.

Common Dispute Resolution Procedures (ref 6.2)

Education may be able to adopt a simpler process as it is a closed domain.

Competition Policy Report

The AVCC's objective is to ensure that the edu.au domain name administration is both efficient and effective and that costs are kept as low as possible. We have concerns that the auDA model will be more complex than needed for the edu.au domain and this may result in higher costs to education stakeholders.

Single registries for au and each 2LD versus Single registry for au and all 2LD's (ref 4.3A and 4.3B)

The AVCC prefers Model 4.3A – namely a single registry for .au and single registries for each 2LD. We believe there are advantages to education stakeholders in this distributed model.

The AVCC would be happy to work with auDA to define and implement the necessary protocols for DNS support and for provision of an agreed set of information into a central database (e.g. for who is support) from per 2LD registries.

As a closed domain, we believe that a separate 2LD registry provides an effective and cost-efficient repository of educational registrant information – some of which will drive the DNS and some (but not all) made available for other purposes.

Registrars (ref 4.3)

Multiple registrars competing with each other across all 2LD's including a closed 2LD like edu.au may increase costs and administrative complexity to education stakeholders. The lowest cost option for education may be to centrally fund the administration of a common registrar. The need for competing registrars does not arise if this funding model is adopted and there are advantages in having a single policy interpretation and checking point. Hence it must be possible for edu.au to opt-out of any broader 2LD competitive registrar model.

Registrars should be responsible for managing the behaviour of resellers (ref 4.5)

It is assumed that would be no need for resellers in the edu.au domain if no charge applies for domain names.

Yours sincerely

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

T J Mullarvey
Chief Executive Officer