To the auDA New Names Policy committee and auDA board for consideration.

Addressing the May 2001 discussion paper.

Q.1) What Criteria should we use in considering new 2LD's

A brief recap and summary of what has already been proposed as criteria would seem to cover most of this.

There has however been little evidence submitted to date indicating that a real need exists for the creation of any new 2LD's.

1) **The Panel proposed in its Final Report that consideration be given to creation of new 2LDs. In summary, the Panel suggested that the creation of new 2LDs would:**

   a) Make the DNS more useful to Internet users
   b) Increase the number of domain names.
   c) Enlarge choices.
   d) Enhance competition.
   e) Create conceptual diversity in the DNS.

2) **The panels current discussion paper puts forward the following criteria when considering new 2LD's:**

   a) **Coherent**. A common set of principles, baseline policies and rules which apply to everyone across all 2LDs.
   b) **Flexible**. Responsive to the different needs of different types of domains, and to changing environments.
   c) **Competitive**. Protects domain users as the ultimate beneficiaries of a well-regulated system.
   d) **Simple**. Clear and simple rules, applications simple to process.
   e) **Robust**. Rules must be technically feasible and stable, and registry information should be reliable and publicly accessible.
   f) **Consistent** with other rights. Including intellectual property rights of individuals and businesses.
   g) **Internationally benchmarked**. Has regard to international standards and best practice, while also reflecting Australian community standards and identity.
   h) **Participative**. Promotes self-regulation and stakeholder participation.
   i) **Fair**. Promotes trust in the integrity of the system.
   j) **Transparent**. Adequately addresses privacy and other consumer protection issues.

3) **The current discussion paper also indicates that auDA may invite people to submit proposals for changes to existing 2LDs, adoption of new gTLDs, and/or creation of new 2LDs.Such proposals must state:**

   a) The reason for proposing a new 2LD, in terms of the criteria set out in the paper, in particular, how the new 2LD would improve the functionality and utility of the DNS and the reason why the purposes of the new 2LD are not met adequately by the existing system.

b) The eligibility criteria which would apply to the new name. Proponents must assume that general eligibility rules would apply to all as set out in the final report of the Name Panel.

c) A description of the new 2LD which is sufficiently detailed to differentiate it clearly from existing 2LDs (or align if with an existing 2LD if that is its purpose).The proposal must indicate the relationship of the new 2LD to other 2LDs, including the extent to which there is overlap in roles.

d) Examples and suggestions as to possible names for the new 2LD – this is optional – the choice of an actual 2LD name might be left to auDA.

e) Indication of what other rules might apply to the new 2LD.

4) Whilst these criteria are relatively functional they are not exhaustive other criteria could be easily inserted as well, for example:

a) **Conceptually simple**. Any successfully proposed 2LD's structure should be simple in concept

b) **Intuitive**. For the sake of the users any 2LD structure should be easy to recognise and remember, any elements or substructures (including 3ld's) should be guessable.

c) **Universal**, in its application and structure, across the whole domain space.

d) **Immutable/stable**, a solid structure, a structure and rules not easily manipulated by the whim of minorities or temporary committee folk.

e) **Independent** of commercial providers eg ISP's or ICH's,

f) **Supportive** of the fledgling IT industry

g) **Needed,** it should address a broad community or user need, not just that of a narrow control group.

5) re are 2 more points that need to be noted and these have particular reference to the issues relating to geographic namespace:

Its easy to build a geographical domain name system, but difficult to come up with a solution that allows equity and non exclusive ownership for the whole community.

It is impossible to discuss the allocation of Domain Names without the reference points of what is to be, or can be, done with them.

Q.3). WHAT NEW 2LDs SHOULD BE INTRODUCED?

The issue of the geographic Domain name system is not about if it should be created or not, but the politics of exclusion, who will control who can publish and who cannot on the communities site.

Proposal for Creation of a Closed Geographic Domain Name Structure for the .au namespace.

Geographical Domain Name systems

(TSC - Town.State.Country)

Based on the experience gained over the last 4 years of management and application in geographic domain name systems, this proposal is being submitted to the committee for consideration. It is a worlds best practice solution for creation, equitable use and responsible management of the geographic component of the .au namespace.

It provides an intuitive and commercially independent email addressing component that would enable all Australians to have a logical and portable email address regardless of their work status or ISP.

It provides equitable use of the web publishing component in a manner that no Australians would be excluded, supports the growth of Australia's content industry and promotes the use of current commercial content hosts.

The system is ideally suited to the content filtering paradigms and would readily work in with the legislation enacted at both state and federal government levels

What is the need?

An Intuitive system for finding something in a known geographic location within Australia
A common system of email addressing within Australia
A structured system of web addressing that matches the email system
A personally portable email system
An accountable system of addressing to cover the needs of law enforcement agencies and legislative bodies,
A fully participative email and web addressing system,
A neutrally operated, stable base within cyberspace.

Eligibility criteria,

All Australians and Australian operating companies would be eligible, as laid out by auDA from time to time. This would have to be worked in with the rules and legacy structure of physical addressing. As would the change of address connundrums.The allocation of space underneath the domain structure (ie directories and email addressing) would be in accordance with set guidelines and be consistent from town domain to domain across the country.

The need for an intuitive addressing system within the DNS is becoming paramount. The old standard cry of "the DNS is not (for use as) a search engine" is becoming overshadowed by the reality of the practice of "guessing" a URL and the commercial scramble for "intuitive" or "portal" style names.

The most pressing demand arises out of the need for "provider independent" e-mail and web addressing that is applicable not only to the business or cluster group levels of the community, but also fits and is practicable for the individuals within the community.

For such a system to be easily intuitive it would have to be universal within the domain space, and have reasonably immutable structure across the whole.

The prime requisite of such a system would be that it made simple sense.

Email would look like..

> individual or service @ town.state.country

the corresponding URL would take the form of

> www.town.state.country/individual or service

these would then look like

> police@moe.vic.au   url = www.moe.vic.au/police

The lessons learned from the failure of the .us namespace to produce such a system must be taken into consideration at this point.

The .us namespace was/is (in most cases) allocated the regulation and structure of the sub levels to the relevant geo-political bodies. This led to a wide variety of structures and the loss of any real usability within the namespace.

It is only recently that the US govt. have seen the possibilities of this namespace and have attempted to bring it back under control via the US Postal Service. The .us legacy system may however be irreparably damaged.

The .us geopolitical system failure and the problems experienced in the Gippsland Geographical Domain system trials both indelibly highlight the need for an immutable structural base.

The need for a centrally coordinated body, preferably some sort of statutory or semi govt. body, whose mission and scope aligns closely with the task at hand is paramount. It is also important that this body would have a presence in even the most remote areas of the country. The obvious choice for the .au namespace would be the institution whose role is apolitical and whose charter encompasses the use of equitable use of geographical names for the public use, namely Australia Post.

A brief overview of the Gippsland Experience.

Introduction

Its easy to build a geographical domain name system, but difficult to come up with a solution that allows equity and non exclusive ownership for the whole community.

In Gippsland, a geographical domain name system was created and provided to the community to facilitate promotion, e-commerce development and community publishing.

It is impossible to discuss the allocation of Domain Names without the reference points of what is /can be done with them. A domain name without a web and/or mail server attached is simply another dead end on the net. Who puts up and controls the content on the community domain is the underlying issue in any discussion about generic or geographic domains.

The domain system utilised for Gippsland is structured in the form of "townname".net. Each Town was provided (by a benevolent Internet Content Host or ICH) with a hosted web and mail server corresponding to the domain name, and provided with some training and unlimited technical support.

The first conundrum, and one that has never been fully answered, particularly from within a geographic community, is "who is the community", or "who within the community should have ultimate control of what is published on the domain".

Whilst it would seem that the Local Government bodies would be the obvious choice, they already had their hands full with their officially allocated domain structure (.gov.au) Consideration was also given at this point to the .us experience and when coupled with with the considerable reluctance of the LGO's to understand or to take up the responsibility, it was decided to attempt the assistance to the communties directly.

The initial contacts to each community were set up within the Adult and Community Further Education (ACFE) Centres, neighbourhood houses or community outreach centres.

These were linked together via a committee termed the Gippsland Community Network (GCN). This was chaired by the regional ACFE manager and also incorporated representation from local government organisations.

This worked fine until some of the individuals representing the community organisations perceived the community domain as a way to gain additional leverage or personal wealth or power within their community.

The methodology utilised to exercise power within the community domains was that of exclusion. This was done by not allowing politically competitive community groups to publish on the site.

Political manoeuvring to achieve "total control and ownership" of the domains by these self interested individuals (and sometimes community faction groups themselves) within the communities generated political interference to such an extent that the survival of the system itself was threatened

Fortunately the whole system was locked together by a Memorandum Of Understanding between the ICH and the GCN. In this MOU it was clearly stated that ownership of the domains remained with the "community neutral" ICH.

The system was therefore essentially proofed against the localised committee stacking practices which proved to be a common methodology of those trying to gain exclusive control of their allocated domain.

The pattern of instigation, development and attempted control can be seen in many of the communities as each reaches certain trigger points within the development of their domain.

A brief overview of the .us Experience.

The .us system began after the issue of the two letter country codes. Initially it was just assumed that all domain names that did not have a Two letter country code were domains within the United States domain Name system.

As the internet became more universal business and local government began to take notice of the .us allocated space.

The allocation of the .us space was hierarchical and individual substructures were controlled and allocated by local geopolitical bodies. This meant for example that a state space ie .wi.us would be run by a state body (Wisconsin) and substructures were effectively allocated by sub government bodies (local counties, local cities etc).

Because of the diverse structures within local counties and states the system varied greatly between regions and between states. This reduced the effectiveness of the system in being able to quickly find or define possible addressing within the overall namespace . Effectively local geopolitical control almost completely negated intuitive and universal structural base required for any effective naming system to occur

Identification of issues

There is expected to be little outside challenge to the distribution and allocation of email addresses via Australia Post. Mostly this is perceived as an extension of their current role into the new technology.

At this stage The proposal has been put to Australia Post and their official position is this..

> *"This proposal has been presented to Australia Post. While recognising that the proposal has merits and complements Post's existing physical addressing capabilities, Post management cannot give a firm commitment to endorsing the proposal at this time. However, Post is prepared to support the proposal being further developed to a stage where normal commercial and technical evaluation principles can be applied and a 'go/no go' decision given."*

As is quite understandable given that this proposal was developed prior to asking them if they would like to be involved.

Action research through the current trials indicates that a controversy may arise over the web publishing rights of a geographic domain. It is envisaged that Australia Post would be wise enough not to fall for the snake oil illusion that web presence will equal massive income.

Other less aware organisations may be disposed to challenge for the publishing rights under the current paradigm. Experience indicates these are more of a power nature rather than based in any technical or resource standpoint. These organisations include, local shires, local community groups, Business and Tourism groups, Regional Councils and possibly even State Tourism Authorities etc.

There is also likely to be considerable anxiety emanating from the commercial sector if the standard paradigm of publishing on the domains is followed.

What is required therefore is a different publishing paradigm.

The Generations and style of publishing paradigms are discussed in detail in the first paper on this subject. A very brief overview is this:-

Publishing Paradigms,

1st generation Portal, or Centralised Style Publishing

Where a single central (controlling) group within a community put all the information up.

Second Generation, or distributed Publishing models,

Where the Community is provided partial access to publishing under a structured input format

Whilst both of these traditional publishing paradigms have a place, neither are suitable, nor provide solutions for the issues of competition, community engagement, ownership, or hosting.

Don't Publish Paradigm
Where the members of the community self update the pointers that seamlessly redirect from their own issued address to any nominated web page.

This can be achieved whilst still providing a URL that is permanent, intuitive and matches the email address issued.

This combination of alternative technologies and responsible management provides the stable, nuetral, intuitive and universal application of the technology in a worlds best practice paradigm.

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