



Internet Society of Australia
A Chapter of the Internet Society

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To: Patrick Sharry

Via email: strat-plan-comments@auda.org.au

**ISOC-AU SUMISSION: in response to the Australian Domain Name Administrator (auDA)
Draft Strategic Plan**

The Internet Society of Australia (ISOC-AU) is a non-profit society founded in 1996 that promotes the Internet development in Australia for the whole community – private, academic and business users under the banner of *the Internet is for everyone!* ISOC-AU is a chapter of the worldwide Internet Society and is a peak body organisation, representing the interests of Internet users in this country. We have a longstanding and ongoing commitment to the effective representation of these interests in code development and self-regulatory processes in the telecommunications, domain name and Internet-related services industries.

The overriding objective of the Society is to give expression to the needs and wishes of individuals, groups, or organisations that have a common interest in the viability of the Internet in Australia, so that all Australian users of the Internet may continue to benefit from, and contribute to, its applications, technologies, and evolution. This submission, therefore, is made from the perspective of the users of the Internet, drawing on the strong technical base of understanding of our ISOC-AU membership.

In our view, the following overarching principles underpin our response to the auDA Draft Strategic Plan (the Plan):

- Australian domain names are a national resource that should be managed for the benefit of all Internet users: Government, business, academic and private users;
- Australian domain names should be managed to maximise the system's stability, reliability, security and accessibility; and
- The processes for managing Australian domain names should be as open and transparent as possible, with opportunities for meaningful participation by all stakeholder groups.

Plan Objectives

Our first comment is that the Plan should include overarching objectives for auDA management of the .au domain name system. 'Strategic Elements' of the Plan should be assessed on the extent to which they will further the achievement of those objectives. ISOC-AU's suggests those objectives include:

- management of the .au domain name system for the benefit of all Internet users;
- minimisation of risk for the system and ensuring the system's stability, reliability, security and utility; and
- use of open and transparent processes.

Our specific comments are as follows:

Key Influencing Factors

The Plan lists 'Key Influencing Factors' that are likely to impact on auDA. The two factors ISOC-AU has comments on are:

- *Monitoring of policy breach instances in an environment where commercial models in the domain name market place drive ever more sophisticated ways of testing policy boundaries and interpretation*
- *An ongoing obligation to review and renew auDA processes in order to operate efficiently and effectively*

The external challenge listed by the Plan, monitoring policy breach instances, should include monitoring new issues as they arise that may not be addressed, or adequately addressed, in existing auDA policies.

auDA should ensure that its processes for policy reviews are open and transparent and genuinely seek out views of all stakeholders

ISOC-AU also proposes another key external challenge about domain name disputes be considered. Domain name disputes will, increasingly, be redistributive disputes between competing legitimate stakeholders. This may well call for the clarification of existing auDA policies and/or development of new policies.

The Plan then lists its 'Strategic Initiatives' to address the Key Influencing Factors, as follows:

1. Enabling and enforcing regulatory compliance

The Plan suggests a component to this initiative as:

a) Review complaint handling mechanisms

ISOC-AU supports the auDA suggestion to review of its complaint handling mechanisms. Specifically, we support the suggestion that there be a mechanism for review of the procedural fairness of an auDA decision. Such process should be independent of auDA, have experience in determining matters of procedural fairness, and be as inexpensive as reasonably possible, creating a realistic option for individuals and small businesses.

2. Reviewing and developing relevant Policy

The Plan suggests two components to this initiative:

a) Conduct ongoing policy reviews in accordance with the policy review model in accordance with specified time periods

b) Review the Advisory Panel process

While ISOC-AU supports ongoing reviews of existing policies, the terms of reference for those reviews must be wide enough to ensure that new issues are addressed in a timely manner. If new issues require clarification of an existing policy or development of new policies, this must be done in an open, transparent manner.

As part of its policy review processes, auDA should develop metrics that assist in determining both whether and to what extent there is compliance with auDA policies and whether its larger objectives of a safe, reliable domain name system are achieved. One example of such metrics could be the data collected by McAfee on issues like fraudulent

practices, or drive-by-downloads that provide some indication of the safety and security of the domain name system.

ISOC-AU also supports a review of the Advisory Panel process. auDA must ensure that Panels have a balance of members representing as much as possible all stakeholders, as has been its practice to date. The Panel processes must also ensure that all stakeholders have a genuine opportunity to participate, recognising particularly that consumer groups often do not have adequate resources to attend meetings in person.

3. Maximising security and technical stability of the .au name space

The Plan suggests the following actions under this heading:

- a) Establish Security Response Contingency Funding*
- b) Develop a Future Technology Identification Strategy*
- c) Review Technical Provision Adequacy*
- d) Australian Security and Stability threat assessment*
- e) Rollout of secondary server security plan*
- f) Work with other ccTLDs to find cooperative ways of enhancing security*
- g) Review Registrar Contingency Action Plan*
- h) Review Registry Contingency Action Plan*

ISOC-AU clearly supports strategies to enhance the security and stability of the .au name space. While much of this objective can be achieved within auDA, some of the above strategies will need to be developed in cooperation with AusRegistry, the registrars and resellers.

4. Educating .au name space stakeholders

The Plan lists includes the following initiatives under this heading:

- a) Development and distribution of an email for first time registrants to improve their awareness of auDA and domain name issues*
- b) Production of a DVD of providing information and guidelines for small businesses*
- c) Broadening of distribution of brochures through a promotion and distribution campaign*
- d) Targeting of key consumer affairs and law enforcement stakeholders for one-on-one education opportunities*

ISOC-AU's first concern is that the target audience for those initiatives are listed by the Plan as follows:

- *Registrants*
- *Prospective registrants*
- *Resellers*
- *State Government consumer affairs representatives*
- *Law enforcement agencies*
- *Influencers and professional advisors (Lawyers, Accountants, etc.)*

While that list includes those most impacted by domain names, it should also include the larger group of Internet users such as business, academics, government and individuals.

The elements of the awareness campaign listed include the development and provision of DVDs and brochures. While these can be useful elements of awareness campaigns, another strategy should include liaison with various stakeholder groups such as ISOC-AU, business organizations, and computer groups.

Another important strategy is the expansion of the use of auDA's website to promote awareness and understanding of its role and processes. The advantage of using online material for awareness campaigns is that such material can be quickly corrected, updated or added to without additional costs for the reproduction of materials. The website should also provide links to other relevant sites.

5. Efficient administration of auDA activities

auDA's 'efficient administration' of its activities must be measured against the achievement of its larger policy objectives (suggested earlier in this submission), in the first instance rather than against the more traditional efficiency metrics such as financial management or budgetary controls. Indeed, the quality of auDA's management of the auDA domain name system will be taken as a measure of success of the self regulatory regime for domain name management.

The Plan lists several initiatives for auDA to achieve efficiency in the administration of its activities. ISOC-AU believes it is up to auDA to determine how best to achieve this.

6. Representing Australian Internet industry interests at national and international fora.

ISOC-AU agrees that auDA, through its management of the .au domain name space, has an important role to play in Internet industry issues at both national and international levels. However, auDA does not and should not attempt to represent the 'Internet industry' per se. The Internet industry has many other components to it including the Regional Internet Registries, ISOC (as home to the IETF and IAB), the Internet service providers (represented by the IIA), as well as the variety of Internet users.