

Sent: Sunday, 7 September 2014 4:40 AM

To: edac

Subject: edu.au Governance and Policy Review Submission

Importance: High

edu.au Governance and Policy Review Submission by the International Career Institute

The International Career Institute is in favour of revising the Domain Eligibility and Allocation Requirements to favour accessibility to more education related entities. The purpose of this is to be more inclusive of providers of education and training who's primary purpose is to provide education but do not fall within the currently stipulated Eligibility Requirements.

We believe that the .edu.au domain name should be open to those incorporated bodies who show that their project or programs:

- have a clear education and/or training focus,
- meets a set definition of a project or program, and
- can provide a reference from at least one current .edu.au licence holder as a form of peer endorsement and retaining the integrity of the .edu.au domain name.

Widening the scope of entities that are eligible to register for a edu.au domain name will enable education websites to carry a more relevant domain name. The following domain names: .com.au .org.au and net.au are unsuitable for many websites in the education space.

Widening the scope of entities would also increase the growth in the number of edu.au domain name licences and improve the financial stability of the domain.

It is important to point out that the current Eligibility Requirements seem to suggest that one of the only bona fide participants in the Australian education and training sector are those accredited by agencies such as ASQA. When in reality in Australia we have course providers that pre-date ASQA, its predecessor agencies and the RTO system. Accreditation with bodies such as ASQA is voluntary and only compulsory should a provider be offering qualifications from the NQF.

Many education content providers, providers of short courses and courses from outside of the ASQA / NQF system are currently excluded from eligibility of the .edu.au domain name which is a discriminatory policy that excludes entities that should otherwise be eligible due to the nature of its education services and operations.

We also point out that we currently have .edu.au domain holders who would not be eligible under the current policies to hold a edu.au domain name. This occurs under a grandfathering policy enabling holders of .edu.au domains to retain and continue to use these domains even though they were registered at a time when the current policies did not exist or under a different eligibility policy framework. This means that we currently have .edu.au domains / websites which do not meet the current eligibility requirements and yet we also have content providers and bona fide course providers who are excluded from the most relevant domain name despite being an active and bona fide entity participating in education and training activities.

Increasing access to the .edu.au domain is appropriate and acts for the benefit of the Australian education sector rather than making it an exclusive domain for only a portion of providers who operate within the ASQA system. It is however at the same time still important to maintain checks and balances that will only enable bona fide providers of education content and training access to the edu.au domain name.

Yours sincerely,

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<http://www.ici.net.au>