

RESPONSE TO REVIEW OF AUSTRALIA'S .AU DOMAIN MANAGEMENT

Discussion paper

November 2017

Please see below for a submission to the Australian Government's Department of Communications and the Arts 2017 Review of Australia's .au domain management by the Council of Australasian University Directors of Information Technology (CAUDIT) – <https://www.caudit.edu.au/about-caudit> .

The Council of Australasian University Directors of Information Technology (CAUDIT) is an incorporated entity with membership drawn from the higher education and research institutions in Australia, New Zealand, the South Pacific, Timor-Leste and Papua New Guinea, as well as research organisations such as the Commonwealth Scientific & Industrial Research Organisation (CSIRO), Defence Science and Technology Group (DSTG), Australian Institute of Marine Science (AIMS), Australian Nuclear Science and Technology Organisation (ANSTO), the Garvan Institute of Medical Research, Geoscience Australia and UTS:Insearch. Members are represented by the most senior IT person in their organisation - generally their Chief Information Officer, Chief Digital Officer or Director, IT.

We note the terms of the Australian Government's endorsement of the .au Domain Administration (auDA) as the appropriate entity to administer Australia's top-level domain (.au) on behalf of Australian internet users were established in 2000 and also note the many changes to the environment that have occurred since then.

In summary, CAUDIT draws the following key points to your attention:

- The intention of the review is good however it is important to ensure that brand identity and value of “.edu.au”, DNS security, and reputation of the DNS system isn't threatened by new controls.
- It is imperative that the outcomes have a long-term view e.g. in consideration of the next 50 years. A long-term view of human friendly internet site identity and addressing is vital, lest short term commercial interests devalue the long term utility of the system.
- The value of a neutral system of internet addressing, free from political or commercial manipulation and control is an important principle. This is vital to ensure trust in the system. Ref: <https://freedom-to-tinker.com/2007/11/12/verizon-violates-net-neutrality-dns-deviations/> and https://www.theregister.co.uk/2017/12/14/protecting_dns_privacy/
- There is a real concern of cyber-squatting and that there needs to be strong governance to ensure security and that cyber-squatting does not occur. We need insurance that the veracity of the “.edu.au” domain is maintained.
- Cyber security of the DNS system is paramount. Efforts should be made to ensure the DNS resolution is not manipulated, ie DNS poisoning, DNS harvesting, DNS lookup monitoring, DNS interception and redirection.
- It is considered that the Deloitte Report undervalues the sector.

In response to the specific questions posed in the discussion paper, CAUDIT provides the following additional comments:

auDA's roles and responsibilities

1. What are auDA's primary roles and responsibilities?



At least three separate – and different - lists identify 'auDA's role and responsibilities. E.g. adDA's 2015-16 Annual Report, the Australian Governments initial set of expectations and that listed in the Deloitte Access Economics Report.

Any statement of auDA's primary role and responsibilities needs to be a 'forward-looking' statement and include recognition that the internet and the .au domain is a critical piece of Australian infrastructure for business, education and society good.

2. Do the current terms of endorsement set out appropriate guiding principles for a fit for purpose .au ccTLD manager?

While the terms of endorsement recognise the internet naming system is a public resource, these could be evolved to reflect the 'fit for purpose' aspect mentioned in this question and take into consideration a long -term view for the good of the nation.

3. Do the terms of endorsement reflect community expectations for the management of the .au ccTLD?

It is imperative that the guiding principles have a long-term view e.g. in consideration of the next 50 years. A long-term view of human friendly internet site identity and addressing is vital, lest short term commercial interests devalue the long-term utility of the system.

4. What external trends and developments may affect auDA's roles and responsibilities?

The increasing reliance of government, education, business and the private individual on provision of and access to a fair and unbiased internet.

Corporate governance

5. What best practice approaches and processes should be considered with regard to auDA corporate governance?

Imposing terms of appointment and limitations on the number of terms a member of the Board may serve is recommended. Other good practices such as gender diversity; identifying required skill sets; and regular reviews of the Board's functionality are recommended. It is recommended that all Board members be graduates of the Australian Institute of Company Directors 'Directors' course.

Related to governance and stakeholder engagement, it is recommended there be a firm separation between ESA and the eDAC. ESA's role as secretariat for eDAC and their role as registrar could be, and be seen as a conflict of interest.

6. What does good corporate governance for auDA look like? Are the ASX corporate governance principles sufficient? Should other principles also be considered?

The Australian Institute of Company Directors provides good guidance on corporate governance.

7. Should reform of existing auDA corporate governance arrangements be considered? If so, what are the reform priorities?

Yes.

Broadening of stakeholder representation.



8. Do the current board arrangements support auDA in effectively delivering its roles and responsibilities?

Having only four representatives of the 'Demand Class' on the Board appears limiting. It would be helpful if more information were published – such as which organisation each member of the Board hails from.

It is noted that one position of 'Demand Class Director' is currently vacant. No information appears on the auDA Board web page to indicate how or when that role will be filled. (It is separately noted that the AGM was held on 27 November 2017 and that five nominations had been received for two Demand Class Directors. It is also noted that there are currently 303 members of auDA. This being a mix of organisations and individuals – with 253 Demand Class and 49 Supply Class with 1 individual unidentified.)

9. Should reform of existing board arrangements be considered? If so, what are the reform priorities?

Identification of skills required and any skills gaps. Implementation of terms.

Stakeholder engagement

10. Who are auDA's stakeholders?

auDA's stakeholders include the higher education institutions of Australia. Technology in higher education is represented by the Council of Australasian University Directors of Information Technology (CAUDIT).

11. How should auDA engage with its stakeholders? Are there guiding principles which should be considered?

More formal recognition and engagement with eDAC and CAUDIT is recommended.

12. Are auDA's stakeholder engagement processes effective?

No. A more proactive engagement strategy would facilitate better notification of key engagement activities such as reviews enabling more comprehensive input.

13. Is a transparency and accountability framework effective?

More detailed (and published) criteria for membership would be helpful ref. section 9 of the Constitution.

Membership

14. Is auDA's membership structure reflective of the range of stakeholders that rely on, or interact with, the .au domain?

No.

15. Does auDA's membership structure support it in delivering its roles and responsibilities?

This is unclear as it is not clear if all stakeholders are adequately represented on the Board or what engagement framework is in place.

Security of the .au domain

16. What emerging risks does auDA face in relation to the security and stability of the .au domain?

There is a real concern of cyber-squatting and that there needs to be strong governance to ensure security and that cyber-squatting does not occur. We need insurance that the veracity of the .edu.au domain is maintained.

The intention of the review is good however it is important to ensure that security isn't threatened by new controls.



17. What is best practice for DNS administration?

It is important to ensure that brand identity and value of “.edu.au”, DNS security, and reputation of the DNS system isn’t threatened by new controls

The value of a neutral system of internet addressing, free from political or commercial manipulation and control is an important principle. This is vital to ensure trust in the system.

18. Does auDA maintain appropriate mitigation strategies? What additional mitigation strategies should be considered? How should these strategies be assessed?

It is imperative that the outcomes have a long-term view e.g. in consideration of the next 50 years. A long-term view of human friendly internet site identity and addressing is vital, lest short term commercial interests devalue the long-term utility of the system.

19. What is the optimal mix of capabilities to expand auDA’s cybersecurity preparedness?

There is a real concern of cyber-squatting and that there needs to be strong governance to ensure security and that cyber-squatting does not occur. We need insurance that the veracity of the “.edu.au” domain is maintained.

Cyber security of the DNS system is paramount. Efforts should be made to ensure the DNS resolution is not manipulated, ie DNS poisoning, DNS harvesting, DNS lookup monitoring, DNS interception and redirection.

20. How should auDA engage with the Government in its management of risks?

Regular consultation; regular reporting (incl financials); sign-off by the government on the Accountability and Transparency Framework; sign-off on Board membership.

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I confirm CAUDIT’s submission can be made public.

