

# Commentary on the .au Domain Administration's "Registry Technical Specification" V1.0

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After playing an active part internationally in the development of a number of ccTLD's I am heartened to see auDA making a concerted effort in the reconstruction of the au domain name space. I have quickly read the "Registry Technical Specification (V1.0)" and have a number of comments;

1. This is a detailed document and the time given for review does not reflect this,
2. There is a need for a standalone document outlining the business goals, objectives and functionality of the new system,
3. The establishment of a unique Registry Access Protocol (RAP), however temporary, could lead to extra costs in the establishment of the new systems and is an unneeded piece of regulation.

## ***Review Time***

This is a detailed document of over 50 pages which I'm sure took considerably longer than 2 weeks to prepare. To gather a rough consensus will, I believe take considerably longer than 2 weeks. Due to the short timeframes I am unable to attend the scheduled meeting on the 2<sup>nd</sup> October.

## ***High Level Documentation***

Technical specifications are generally there to support the required functionality as defined by business. I believe that the best way to introduce a new .au dns is to first look at what is trying to be achieved then allow businesses to come up with their own technical specifications to meet those objectives. My understanding is that these objectives are;

1. To introduce competition into the .au domain name space by separating the monopoly registry function from the contestable registrar function in each of the 'open' or 'commercial' second level domains, and
2. To promote the growth of the .au domain name space.

To address these objectives we need to clarify and determine Registrar functionality as distinct from Registry functionality. A high level paper which defines this, along with defining the business requirements (and transition issues) is appropriate. A detailed analysis of the current system should also accompany it. The only reference made to the existing system seems to be that it is a “thinner” registry (Section 2.2 - table).

Why define the business requirements? Well first of all, it will help the community build a general consensus on the requirements of the new .au dns. Secondly, and just as important, it can be used by tendering businesses to develop their own solutions, rather than being forced to all conform to one stated technical specification. This means that the best solution can be found out of a number of different tenders based on price, performance and fit. So long as the proposed system meets the business requirements it doesn't particularly matter how it is done (for example when I am getting money from a bank I don't care what the underlying process is to give me the money so long as it is done in a timely and accurate manner).

Defining the business requirements and allowing industry to provide a technical specification will encourage more companies to bid for the registry services. And this, surely, is a good thing for competition. Some companies may develop their own unique systems, whilst others may be able to use systems, whilst others yet may bring the Australian systems in line with international standards (not a bad thing to do if we have to change our existing system).

Finally, cost. If companies already have systems in place which meet the business objectives for the .au dns it is unlikely that they will want to spend money to re-develop new systems as set down by auDA.

### ***Registry Access Protocol (RAP)***

Moving away from the need to define the business needs I would also like a clearer understanding on the need for restricting systems to the use of an Interim Registry Registrar Protocol (IRRP). The RAP required establishes a system unique to Australia which will be expensive to develop and no adequate justification is given for restricting tenders to this single system. I don't mind if a company suggests this as part of their tender, but I suspect others may well opt for existing systems being used by other gTLD's. The EPP, which is somewhat cryptically referenced in the *Technical Specification*, is an example of an emerging protocol for registries, which could be implemented and would encourage international registrars who want to sell .au domain names.

Also, using existing platforms often reduces the development costs. Having a fully developed specification for tendering business can lead to one of two problems;

1. You may not get the best possible solution, and
2. The existing technical specification may be too difficult to implement (i.e. due to cost or complexity)

Most importantly, by defining the technical specification auDA is moving away from the light touch industry regulation to a heavy handed approach which prohibits business from coming up with solutions to meet the functional requirements of the .au dns. As a result it is likely to delay convergence of the .au dns with other global standards and practices and may significantly increase the cost of registering a domain name in the Australian domain name space.

Overall I have three main comments on the Technical Specification;

1. Timing: ~ the lack of time to gather even a rough consensus. I'm sure the document took several weeks and to do it justice will require more than a cursory glance,
2. High Level Documentation: ~ Technical specifications are there to support the businesses required functionality. A high level paper is required which defines the required Registry and Registrar functionalities (along with the scope, SLA's etc). Clear criteria, such as cost, flexibility and scalability should be highlighted so tendering organisations can focus on the key requirements of auDA.
3. RAP: ~ the required RAP establishes a system unique to Australia which may be expensive to develop and gives no adequate justification. Furthermore, by defining the Technical specification, auDA is using a heavy handed approach towards industry regulation which prohibits business from coming up with solutions to meet the functional requirements of the .au dns.

I look forward to seeing the next steps towards the development of a new .au domain name space.

Regards,

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