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9th December 2019

Senator the Hon L.K. Reynolds CSC Minister for Defence PO Box 6100, The Senate Parliament House Canberra ACT 2600

By email to: minister@defence.gov.au

Dear Senator Reynolds,

## Ministerial Consent sought to utilise domain name AIF.com.au

My company has been the registrant of this commercial acronym domain name since 26<sup>th</sup> June 2016, and it has been our intention to develop this into a business – a directory of "Australian Insurance & Finance" providers.

However, we are now prohibited from doing so because of an amended policy introduced by the Australian Domain Name Regulator (auDA) in 2018. We cannot update or alter the site, and we stand to lose the domain when it expires in June 2020.

Their <u>2014-06 - Reserved List Policy</u> seeks to stop usage of "words and phrases" restricted under Commonwealth Legislation - in particular **Defence Regulation 2016**. The term "AIF" is included in such acronyms as:

ADF;
AFC;
AIF;
AMF;
ARA;

#### Why Ministerial Consent should be granted

- Each domain name extension in Australia has a specific purpose: i.e. com.au is for commercial entities, gov.au is for government bodies and org.au is for non-commercial organisations.
- The domain name AIF.gov.au is available for registration by Defence or the Government. As are ADF.gov.au; AFC.gov.au; AMF.gov.au and ARA.gov.au.
- The only one of the above registered by Government (Screen Australia) is AFC.gov.au, but this does not resolve to any website

As you can see from the above list, AFC is also a prohibited term. AFC.com.au is
utilised by the Adelaide Football Club (Crows), and I am aware that they
successfully sought permission from the Minister to continue to utilise the
domain. They then forwarded this consent to auDA who allowed them to use the
domain name.

This consent was sought under Defence Force Regulation 2016:

### Part 14—Prohibited words and letters;

## 77 Consent to use prohibited words or letters

**Application** 

- (1) A person may apply to the Minister for consent to use prohibited words or prohibited letters in connection with:
  - (a) a trade, business, calling or profession; or
  - (b) an organisation or body of persons.

May we therefore respectfully request a similar dispensation please?

Yours sincerely,

Ned O'Meara

Ned (Hedley) O'Meara

Director

Domain Syndicates Pty Ltd