

17 September 2013

Our ref: 130916-GRMD-PB

Via email [glenn@riseleyphysio.com](mailto:glenn@riseleyphysio.com)

Dear Glenn,

**Re: Consultation on Eligibility Policy for dotphysio Second Level Domains**

Thank you for the opportunity to comment on the proposed business rules for the use of the dotphysio domain name. The APA acknowledges that issues would present worldwide, but this submission comments explicitly on the Australian context.

The APA believes that it is important to restrict the use of the domain name dotphysio to people who are suitably qualified and legitimately members of the physiotherapy community, to ensure that the public is protected from practitioners who are not appropriately trained and may be falsely claiming to be qualified as a physiotherapist.

The APA supports the criteria proposed in an Australian context, namely that applicants for the domain dotphysio must be a natural person and be entitled to be a member of the Australian Physiotherapy Association (APA). The APA is a member organisation of the WCPT, and our membership criteria require student and physiotherapist members to be registered with the Physiotherapy Board of Australia.

The APA however has some concern about how the restrictions can operate however, particularly in the context of the world wide web which is notoriously difficult to regulate.

To ensure that the term is used exclusively in the context of the physiotherapy community, and is not used to assist people who lack appropriate qualifications make false claims to be a physiotherapist, the APA proposes the following safe-guards be put in place.

**Eligibility for APA membership**

The APA's main membership categories require members to be registered with the Physiotherapy Board of Australia. This makes it easy to assess whether or not a domain name applicant is eligible to use the term dotphysio. There are however other categories of APA membership which are not so straightforward for use in assessing eligibility. Applicants should only be automatically deemed to meet the criteria of eligibility for membership of the APA where they are currently registered as a physiotherapist or student physiotherapist. The APA proposes the following assessment processes for its other membership categories:

- Associate member (Australia) – should either hold current membership of the APA or be eligible for membership of the WCPT member organisation in the country in which their entry level qualification was completed.
- Associate member (overseas) – should be assessed on the basis of eligibility for membership of the WCPT member organisation in the country in which their entry level qualification was completed.
- Affiliate subscriber – should hold current membership of the APA.
- Physiotherapy Assistant (PTA) – should hold current membership of the APA or be able to provide recent evidence that they have been deemed eligible for PTA category membership by the APA.

- Retired – should provide evidence of current or previous registration as a physiotherapist.

### **Maintenance of good standing**

Holders of dotphysio domain names should be required to remain in good standing. In order to ensure the domain names are cancelled where a physiotherapist has had an adverse finding against their name, the APA recommends that a system of checks and balances be set up. In Australia this would require the manager of the dotphysio domain name registry to be aware of adverse findings against practitioners. This could be done either through simply checking the Physiotherapy Board of Australia's website for a list of findings at regular intervals, for example each month, or organising for the Physiotherapy Board of Australia to provide details of any physiotherapist who has had an adverse finding against their name.

Holders of domain names who have had an adverse finding against their name should not be able to own the domain name for the relevant period.

### **Period of Registration**

The APA believes that the period of domain name registration should be annual to align with Registration and APA membership renewal cycles. Each year the domain owner should be required to notify the registry manager of any changes that could affect their ownership of the dotphysio domain.

### **Second Level Domain Names**

In order to protect domain names for use by relevant organisations, there should be additional rules regulating the registration of some second level domain names. This would include such names as edu.physio, wcpt.physio, awp.physio, asn.physio. The APA recommends that this can form the basis of further consultation with the community.

### **On-selling and transferring**

On-selling and transferring of dotphysio domain names can potentially compromise the eligibility process. The APA does not believe on-selling should be allowed, and transfers should be closely regulated in accordance with the eligibility policy.

### **Evidence of relevancy**

Applicants should be required to prove that the domain name they are applying for is relevant to their company or name, and that company or name should be within the physiotherapy community. For instance if the owner of a practice wished to purchase a domain name, they should be required to demonstrate that at least one physiotherapist worked at the practice, and that the name would be used only for that particular practice.

For any queries about this submission, please contact Paula Bateson, Senior Policy Officer at [paula.bateson@physiotherapy.asn.au](mailto:paula.bateson@physiotherapy.asn.au)

Yours faithfully,



Marcus Dripps  
President