

17 July 2018

**SUBJECT:** Response from **APNIC** to the Notice of Inquiry on  
International Internet Policy Priorities

**Docket Number:** 180124068-8068-01

APNIC (Asia Pacific Network Information Centre) is an open, membership-based, not-for-profit organization providing Internet addressing services to the Asia Pacific. As the Regional Internet Registry for the Asia Pacific region, our primary role is to provide Internet number resources (IPv4, IPv6 and ASNs) to our Members in the Asia Pacific region.

We are thankful for the opportunity to provide comments on a subset of questions raised in the NOI. Our answers are provided below.

## **II. MULTISTAKEHOLDER APPROACH TO INTERNET GOVERNANCE**

### **A. Does the multistakeholder approach continue to support an environment for the internet to grow and thrive? If so, why? If not, why not?**

In 2003, the Working Group on Internet Governance (WGIG) identified the prevailing “multistakeholder approach” as a critical success factor in the governance of the Internet. Since that time the multistakeholder model has continued to prevail, with ongoing evolution of its various components, while the Internet has continued to grow massively in its scale, functionality and importance to society. While the Internet has brought many challenges, it can be concluded that the multistakeholder model continues to be a critical contributor to its ongoing and outstanding success.

The Internet Numbers Registry System includes the 5 Regional Internet address Registries (RIRs) and began operations in 1992, predating the formation of ICANN and the WSIS process. Within this system, regional communities of Internet operators and technical experts serve as the main policy-makers, directing policy development in direct response to the changing requirements of the operational Internet. While also evolving continuously, the registry system has proven over the last 25 years to serve as the most conducive approach to maintaining stability, integrity and continuous growth of the Internet’s IP addressing architecture. In particular it has ensured that the Internet’s addressing resources have been conserved to the extent possible, while also being allocated uniquely on a fair and transparent basis; that its fragmentation has remained consistent with the limits of the global Internet routing system; and that reliable public IP address registry services are available to all who require them.

The Internet Numbers Registry System has also been particularly effective in dealing with specific challenges such as IPv4 address exhaustion at the global and regional levels, IPv6

deployment, and the development and deployment of new technologies for security of the Internet routing system; all of which are critical to the Internet as a whole. And as a part of the global multistakeholder environment, the Internet Numbers community has played an active role in processes such as the IANA Stewardship transition and the Internet Governance Forum, and in very many local and regional Internet operation, development and governance processes.

**B. Are there public policy areas in which the multistakeholder approach works best? If yes, what are those areas and why? Are there areas in which the multistakeholder approach does not work effectively? If there are, what are those areas and why?**

The multistakeholder approach to Internet Governance has been a distinctive feature of the Internet itself, since before its discovery and elucidation by the WSIS Working Group on Internet Governance. Both at that time and ever since, it has been regarded as a success factor of the Internet as a unique global infrastructure which has become a critical to almost every aspect of modern society.

It is certain that other industries and associated public policy areas also feature some forms of multistakeholder process, with possible examples being power and transportation infrastructures, health and other social services, and emergency and security services. However it is unknown whether such processes have been identified or described, or whether any analysis have been performed to assess their relative performance or success.

**C. Are the existing accountability structures within multistakeholder internet governance sufficient? If not, why not? What improvements can be made?**

Accountability processes and structures exist in some form within all distinct components of the multistakeholder Internet governance system. Of course, accountability of any system carries significant costs, and should be delivered in consideration of those costs, to the degree and in the form that is required by the stakeholders of that system.

The RIRs operate within governance frameworks that ensure effectiveness of their corporate structures, transparency of processes, and accountability to members and communities. These frameworks vary across the five RIRs, according to legal requirements and regional policies, but all are transparently accessible and publicly [documented](#).

The accountability of regional policy development processes is a critical consideration in the effectiveness and legitimacy of those processes, and also determined primarily by their stakeholders. In both cases there are accountability structures in place, with RIRs' governing Boards, their formal memberships, and their wider communities serving as the primary sources of accountability.

Across the rest of the multistakeholder Internet governance ecosystem, there are many other organisations, systems and processes whose accountabilities are of importance. The specific mechanisms and measures of accountability, as well as the policies and processes to address accountability "problems", are and should be determined by stakeholders. These do tend to

vary widely, and also to evolve over time, particularly in response to differences and changes in responsibilities, in stakeholder expectations and values, and other external factors.

**D. Should the IANA Stewardship Transition be unwound? If yes, why and how? If not, why not?**

The IANA Stewardship Transition should not be unwound.

The transition was a product of the Internet's multistakeholder governance process, and of specific processes which were designed, implemented and concluded by that multistakeholder community. By being undertaken in full transparency and to the satisfaction of the US Government (which ordered the transition, and specified the means by which it would be appraised), the transition not only succeeded, but also confirmed and reinforced the legitimacy of the multistakeholder model itself.

To unwind the IANA Stewardship Transition would reverse a set of changes that are complex and interrelated, and now fully and successfully implemented. If possible at all, it would certainly involve great cost and complexity, and would contradict the expectations of a very large global group of stakeholders who now regard the transition as a *fait accompli*.

**E. What should be NTIA's priorities within ICANN and the GAC?**

We have no comment on specific priorities or activities of the NTIA.

**F. Are there any other DNS related activities NTIA should pursue? If yes, please describe.**

We have no comment on specific priorities or activities of the NTIA.

**G. Are there barriers to engagement at the IGF? If so, how can we lower these barriers?**

The RIRs and wider IP addressing communities have been active participants in the WSIS processes which resulted in the IGF, and in the IGF process itself since its inception. This consistent participation has demonstrated our strong commitment to the multistakeholder model as a means to ensure healthy growth and evolution of the entire Internet ecosystem, as well as our willingness to engage with broader Internet stakeholders on Internet governance issues including those within our direct remit (namely, IP addressing and related issues).

Collectively and individually we have found few barriers to our engagement in the IGF. However in the interests of those individuals and organisations which do experience logistical and financial barriers to participation, we support the MAG's work in exploring opportunities to reduce the cost of participation. The MAG is the proper venue to discuss and determine ways to improve participation, and by which the investment in participation can be more effective.

**H. Are there improvements that can be made to the IGF's structure, organization, planning processes, or intercessional work programs? If so, what are they?**

Yes. These should continue to be discussed at the MAG through active consultation across the multistakeholder community. Again, the MAG is the proper venue for this discussion and for resulting decisions.

**I. What, if any, action can NTIA take to help raise awareness about the IGF and foster stakeholder engagement?**

We have no comment on specific priorities or activities of the NTIA.

**J. What role should multilateral organizations play in internet governance?**

Multilateral organisations are stakeholders in the Internet ecosystem and should play a role as such, on an equal footing with other stakeholders. Specifically however, these organisations play the critical role of aggregating national interests, and in supporting an enabling environment for a stable, secure and interoperable Internet. We stress that their work should not be detached or isolated, or undertaken without active inclusion of and consultation with other Internet stakeholder groups.

#### **IV. EMERGING TECHNOLOGIES AND TRENDS**

**A. What emerging technologies and trends should be the focus of international policy discussions? Please provide specific examples.**

IPv6 should be recognized as a critical enabling technology for the long-term future growth of the Internet, and specifically for preserving the Internet's essential technical characteristics as a global, open and neutral infrastructure.

The so-called Internet of Things (IoT) should be recognized as inseparable from the Internet, or indeed as simply a new and popular term for the Internet itself. There are no fundamental changes implied by the IoT to existing governance, policy, technology, security or operations, and efforts should be made to avoid fragmentation in these regards.

**B. In which international venues should conversations about emerging technology and trends take place? Which international venues are the most effective? Which are the least effective?**

Certain aspects of Internet governance are global in scope and must be addressed accordingly; these include Internet technical standards, operation of key Internet identifier systems (e.g. for names and numbers), and norms for addressing challenges which are global in scope or widely shared. This is NOT to say that unitary institutions are required to address these aspects of governance; rather that global interrelationships and dependencies must always be considered and properly managed in doing so.

The venue of the IGF is an ideal one in which such topics can be raised and explained, and issues discussed. It is effective precisely because it is a global multistakeholder venue which encourages the open participation of all who may be interested in or affected by any relevant Internet-related issue. While the IGF is not a venue for decision-making, it remains a venue of great interest and value to decision-makers, in improving the quality of their products.

On the other hand, the Internet enables and encourages localized and independent action and there is no call for centralizing or creating barriers for entry into conversations that can occur at regional, national, or local levels. The principle of subsidiarity should guide the selection of venues in this regard, with a strong bias towards distributed decision making and self-determination wherever possible.

- C. What are the current best practices for promoting innovation and investment for emerging technologies? Are these best practices universal, or are they dependent upon a country's level of economic development? How should NTIA promote these best practices?**

The activities referred to here can be regarded as a subset of the “conversations” referred to in Part B above. Therefore we offer that response in this case as well.

Regarding NTIA's priorities or activities we have no comment.