

	<b>Comments from IGTF-J (Internet Governance Task Force of Japan) <a href="http://www.igtf.jp">http://www.igtf.jp</a></b>
	Do you have any comments on the process of determining the issues and their presentation by the WGIG?
	<p>IGTF would like to welcome the papers on the assessment of current governance practices, in particular those in the Cluster One; on IP Address, Domain Name Systems, and Root Server zone file management and operations, which we consider very well-balanced and objectively written.</p> <p>We would like to support the overall direction, which includes reasonable reassessment of historical trails and current framework, good recognition of proper functioning of today's Internet resource management, and constructive thinking to improve areas where consensus exists.</p>

	<b>IGTF-J comment on Issues relating to the logical infrastructure of the Internet: IP Numbers [Cluster 1b]</b>
	Has the issue as it applies to the question of Internet Governance been adequately identified?
	<p>Comments:</p> <p>1) On page 4, in “7. Overall assessment”, the paper says “<i>Full use of the IPv4 space</i>”. We would like to point out that RIRs have already been in action to reclaim unused historical address space to achieve this goal. See the following URL for your reference. <a href="http://www.apnic.net/docs/policy/historical-resource-policies.html#5">http://www.apnic.net/docs/policy/historical-resource-policies.html#5</a></p> <p>2) In the same section above, the paper says “<i>Sustainable transformation of the IP addressing and numbering system to IPv6</i>”. We do understand that we certainly need a discussion on “transition from IPv4 to IPv6”, however we do not think “<i>transformation of the IP addressing and numbering system</i>” is the subject of Internet Governance here.</p> <p>3) On page 4, in “6. Coordination”, the paper says “<i>There is no special coordination mechanism between the IP numbering and addressing system</i>”. We need to understand correctly what field is necessary for “<i>IP numbering and addressing scheme</i>” to coordinate with. DNS system itself coordinates between application and domain name. We need to coordinate between IP addressing and “routing table size” but it’s well coordinated by RIR’s open policy forum where engineers from router vendors or Internet operators attend.</p> <p>4) On page 3, in the first paragraph, the paper states, “<i>only ‘suppliers’ of addresses can be members, and only members can influence the policies of the RIR’s</i>”. We consider that “<i>only members can influence</i>” does not reflect the fact that the Open Policy Forum hosted by each RIR are open to anyone, including non-members, interested in the policy development for IP address management.</p> <p>5) On page 3, in the last paragraph, the paper says “<i>the allocation of IP addresses from RIRs to NIRs, as it is the case in some Latin American countries, on the basis of documented</i></p>

	<p>Needs. We like to add that there are several NIRs existing in Asia Pacific region, too.6) On page 4, the paper says “it would be helpful if written policies in this field, developed by RIRs, would be available in the local languages of the region.”</p> <p>We like to point out the fact that APNIC is making translation of major documents into seven regional languages: <a href="#">中文繁體</a> (Chinese Classic), <a href="#">中文简体</a> (Chinese Simplified), <a href="#">Bahasa Indonesia</a>, <a href="#">日本語</a> (Japanese), <a href="#">한국어</a> (Korean), <a href="#">हिन्दी</a> (Hindu) and <a href="#">Tieng Viet</a> (Vietnamese) (<a href="http://www.apnic.net/trans/index.html">http://www.apnic.net/trans/index.html</a>). LACNIC provides their service in English, Spanish, and Portuguese.</p>
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	<p><b>IGTF-J comment on Issues relating to the logical infrastructure of the Internet: Domain Names [Cluster 1b]</b></p>
	<p>Has the issue as it applies to the question of Internet Governance been adequately identified?</p>
	<p>Comments:</p> <ol style="list-style-type: none"> <li>1) Overall, it is well written with sufficient balance.</li> <li>2) On Page 2, second bullet, the paper says: “The Governmental Advisory Committee (GAC) gives advise with regard to ccTLD delegation and re-delegation in particular. However, we believe GAC covers broader topics and it deals with ccTLD delegation and redelegation issues just as one item, not with particular interests.</li> <li>3) On Page 5, 4th paragraph of 5.1, the paper states that “there are no legally binding international arrangements for the delegation and redelegation of ccTLDs, but the issue of delegation/redelegation is a national matter, and therefore we think “legally binding international arrangements are not necessary. Accordingly, “This includes also the missing legal basis for the so-called IANA service does not seem to make sense.</li> <li>4) On page 8, the first bullet says “three stakeholder groups, but we should deal the service providing side and user side as separate stakeholders clearly when making such analysis.</li> <li>5) On page 8, 4th and 5th bullet points, <ul style="list-style-type: none"> <li>• Reassessment of concerns over privacy with the WHOIS database; and</li> <li>• Assessment of the effectiveness of the UDRP appear very abruptly without any previous discussion.</li> </ul> <p>If re-evaluation of Whois privacy issue or effectiveness of UDRP relates to the Internet Governance, a clear base and background should be presented.</p> </li> </ol>

**IGTF-J comment on Issues relating to the logical infrastructure of the Internet: Root Servers [Cluster 1b]**

Has the issue as it applies to the question of Internet Governance been adequately identified?

We appreciate such an excellent, well written work done by the working group. Overall achievement of the paper is rather high, especially the Section 7 (Overall assessment) is well balanced and satisfactory. In the following, we will comment on some details of the paper.

In Section 6, there is no explanation or analysis about what kind of coordination is desirable or needed. We think it is difficult to find any meaning in pointing out merely the absence of coordination without such explanation or analysis.

In section 5.1, paragraph 2, it is stated that *“the process of decision making is not transparent”*, while we think it is more appropriate to rewrite this to *“the process of decision making is not fully transparent”*. This is because some part of decision-making process seems to be transparent.

In section 5.2, paragraph 3, we see in a parenthesis, *“The investment and sovereignty of countries should not be based on trust alone.”* but it is difficult to understand why words like *“investment”* and *“sovereignty”* suddenly appear here. We think it is better to rewrite here simply to *“it should not be based on trust alone”*.

In section 5.2, the last paragraph, it is difficult to understand why *“service providers”* appear here.

In section 5.2, the last paragraph, it is mentioned, *“There is no involvement of civil society organizations.”* We think it is difficult to find suitable meaning of pointing out this fact without explaining the roles and the responsibilities they should (or should not) assume.

In section 5.3, paragraph 3 is about IDNs. As you know, there is no technical difficulty in introduction of IDN TLDs. The introduction is merely administrative matter. In this regard, we think this whole paragraph should be rewritten as the following:

*“According to relevant RFCs, there is no obstacle to introducing IDN TLDs in the root zone. They may be created by just as the same way as Ascii TLD creation. From this point of view, the root server system is neutral to multilingualism and it is not appropriate to use multilingualism as a measure to evaluate the root server system.”*

In Section 4a (page 5), concerning the *“13 server limitation”*, we see a statement of *“No effort has been made to remove this limitation”*, but as far as we use Anycast technology, there is no need to make effort for removing the limitation. Hence, this statement should be deleted.

In Section 4b (page 5), we believe the operators of root servers should not be involved in the policy making and data modifications in order to avoid a conflict of interest. We hope his point will be clearly stated in this paragraph.

In Section 4e.(page 5), we are afraid to say this whole paragraph is completely un-understandable from technical point of view. Is this saying that some different things

from current mechanism of transferring root zone data from the “Distribution Master” to other servers is desirable?

We see a confusion between “zone files of TLDs” and “entries in the root zone file corresponding to TLDs” in several places. The topic of this paper is the “root server”, and hence the former have nothing to do with this paper.

In Section 4.4 (EDITING FUNCTION, page 3) says about the former, so this is not appropriate for this paper.

In 4.5 (IANA FUNCTION, page3) line 2, “TLD zone files” should be corrected to “entries corresponding to each TLD in the root zone file”.