

## NRO Response to the National Advanced IPv6 Centre of Excellence (NAv6) Survey

The Number Resource Organization (NRO) acknowledges Resolution 64 as a positive outcome of the World Telecommunication Standardization Assembly (WTSA 2008), held in Johannesburg, South Africa, from 21- 30 October 2008.

Resolution 64 demonstrates an interest by the International Telecommunication Union (ITU) in contributing to the global deployment of IPv6. The NRO also recognises the need for the ITU's members to know more about the issues of IPv6 address management and policy and it stands ready to assist in this area.

The NRO is comprised of the world's five Regional Internet Registries (RIRs). The RIRs have long established and direct responsibilities related to IPv6 address management and can provide objective and accurate data regarding IP address usage and IPv6 deployment rates. The RIRs also have information on Internet number resource addressing policies and technical matters. For example, the NRO will publish a comprehensive response to the ITU survey on IPv6 deployment, including detailed authoritative data on IPv4 and IPv6 address deployment per country.

The NRO notes that in May 2009, the National Advanced IPv6 Centre of Excellence (NAv6) Malaysia launched a new survey on topics related to IP address management. While the survey is described as being related to the WTSA 2008's Resolution 64, it is not clear whether NAv6 is undertaking this activity on behalf of the ITU Telecommunication Standardization Bureau (ITU-TSB), or on its own initiative.

**The NRO therefore suggests that it would be helpful for the ITU to clarify its relationship with this survey and whether it intends to take note of or make use of the results.**

The NRO also notes with concern that this study goes far beyond the objectives of the WTSA 08's Resolution 64. In particular, the NAv6 has stated "The purpose of the study is to evaluate the request made by many developing countries for the TSB to become an additional registry for IP addresses...". However there is nothing in Resolution 64 that refers any such role for the ITU-TSB. Indeed the ITU-TSB has previously ruled out such a role. Furthermore, there is no reference to any documentary evidence of the "many developing countries" said to have made requests for the TSB to become an additional registry.

**The NRO calls upon the NAv6 to clarify this point by providing these details.**

The NRO is concerned that the scope and orientation of this survey will not assist informed decision-making by the ITU's members or other stakeholders on IPv6 matters. The survey includes a mixture of questions about opinion, questions on complex technical matters that do not have simple "Yes/No" answers and questions regarding hypothetical proposals that cannot be answered meaningfully without further details. Several questions also carry a clear bias, either by asserting

misleading statements, such as one which suggests that IPv6 policies could redress imbalances in IPv4 distribution, or by including value-laden phrases, such as “healthy competition”, which encourage a particular response.

The NRO emphasises that factors involved in IPv6 deployment are numerous, wide-ranging and complex, and that decision-makers need to understand these factors as well as understanding the roles of the various stakeholders that are involved. It wishes to strongly assert the need for cooperative leadership by major actors such as the ITU, the Internet Corporation for Assigned Names and Numbers (ICANN), the NRO and other stakeholders to act in the best interests of IPv6 deployment. We believe that it is imperative that these actors play their respective roles and take opportunities to contribute positively.

The NRO also emphasises that the IPv6 addressing policies, which have been established using consensus by the Internet industry itself, are designed to encourage IPv6 deployment by imposing minimal constraint on address distribution. Currently, no public proposal for fundamental changes to the current organisational responsibilities in this area exists. There are also no documented details of how such changes would be implemented, by whom, or towards what ends. It is the NRO’s opinion that in the absence of any such details, the NAv6 Survey cannot produce a meaningful answer to the questions raised.

It is widely agreed that IPv6 deployment is imperative to the long-term growth, security and stability of the Internet. Moreover, this imperative is now becoming urgent. The NRO calls on all stakeholders to focus their efforts on productive activities towards the goal of IPv6 deployment, in line with their accepted and established responsibilities. **It urges all stakeholders to use the existing forums, such as the Internet Governance Forum (IGF), ICANN, and the five RIRs’ open policy meetings, to move towards a genuine enhanced collaboration. The NRO believes that this will be in the mutual interest of all parties and in the interest of the Internet itself.**

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Chair, Executive Council 2009

On behalf of the Number Resource Organization (NRO)

### The Number Resource Organization (NRO)

*Formed by the Regional Internet Registries (RIRs) to formalise their cooperative efforts, the NRO exists to protect the unallocated Number Resource pool, to promote and protect the bottom-up policy development process, and to act as a focal point for Internet community input into the RIR system.*