	Comments submitted by **IGTF-J (Internet Governance Task Force of Japan)**[*] **http:www.igtf.jp**
	Do you have any comments on the process of determining the issues and their presentation by the WGIG?
	Yes. *The purpose of issue papers may have been explained, but we are still not able to have a clear image about how these papers will be used in the future work of the WGIG.* *We hope this point will be clarified and an appropriate opportunity of commenting will be provided. In this comment, we mainly focus on fact analysis, based upon our understanding of it being the substantial part of the purpose.*

	IGTF-J Comment on the Administration of Internet Names and IP Addresses
	Has the issue as it applies to the question of Internet Governance been adequately identified?
	Comments: *This paper argues IP addresses and Domain Names at the same time. We recognize it provides us with adequate overview of current administration scheme of IP addresses and Domain Names, and analyses are excellent in general.* *However, both this paper and the paper for root server administration sometimes raise several same issues regarding ICANN structure, which seem not to be always consistent. We suggest developing a separate issue paper to discuss ICANN structure itself which is independent from the matters on the administration of IP addresses, Domain Names, and root server.* *We also notice that in some arguments it is not very clear as to which of IP address and Domain Name is pointed out, or both of them. Re-arrangement of the paper would clarify this inconsistency and ambiguousness.* *The framework of the SWOT Analysis is not very clear. Definition is necessary as to what the goal of this analysis is, and what the object compared with the current framework in this SWOT is.*
	Does the paper cover the topic with sufficient depth and accuracy? *Yes, in general.*

Comments
In general, the arguments are comprehensive at sufficient level. Comments on specific sections will be made later.

Does the paper achieve a reasonable balance in weighing relevant matters?
Yes, in general.

Comments

Any other comments

1. *The word* "Internet Names" *is not equivalent to* "Internet Domain Names" *and causes confusion. In this paper, the word* "Domain Names" *instead of* "Internet Names" *should be used in order to understand the topic adequately.*

2. *We recognize it provides us with adequate overview of current administration scheme of IP addresses and Domain Names in the sections from the beginning till just before SWOT analysis.*

3. *As for the sections* ACTORS *and* Forums*, we would like to add NIRs (National Internet Registries) in addition to RIRs and LIRs, which serve LIRs in certain countries and economies in APNIC region and are increasing its importance to fit global IP address policies into local laws and regulations.*

4. *In* SWOT Analysi*s,* <u>Strengths</u> *section is well described in terms of ICANN structure and IP address management. However, we notice that there is no description of ccTLD and gTLD management which have been well coordinated in a bottom-up manner to be finally formalized through ICANN structure. Also, in the last sentence,* "RIR system" *should be replaced by* "IP address management scheme" *to include NIRs and LIRs, and much more detailed description than a simple sentence about its successful self-regulation model should be needed to raise this point as a strength.*

5. *In* <u>Weaknesses</u>*, the first item reads* "The balance within the private-public partnerships"*; but it does not make sense because not the balance, but the imbalance should be a weakness. Also, validity of this analysis is not strong, because we can find a good example of balanced partnership between private and public sector in the case of Japan*

6. *In* <u>Weaknesses</u>*, the second item reads as if* "how does the international community, both private and governmental, influence the IANA-functions" *is the very* "outreach" *which is insufficient. However, there has been a fair amount of effort for outreach in APNIC region to help less development parts of the region with capacity building and other activities.*

7. *In* <u>Threats</u>*, the third item reads* "IP addresses in practice becomes a scarce resource in certain parts of the world." *while RIRs' position is opposite. They point out sufficient numbers of IP addresses are still available for distribution on demand from any part of the world.*

8. *In* <u>Threats</u>*, the forth item reads* "The lack of assuring the implementation of IDN (Internationalized Domain Names) in all parts of the world, and thus creating a division of the Internet."*; however, this fact does not seem obvious to us.*

9. *In* <u>Threats</u>*, the last paragraph discusses* "largest and most significant threat"*; however, what the paragraph wants to state is ambiguous. Especially, it is hard to figure out the specific meaning of the word* "underlying infrastructure".

10. *The section* Adequacy Measured Against Criteria *is well described from neutral observation.*

IGTF-J comment on Administration of the Root Server system

Has the issue as it applies to the question of Internet Governance been adequately identified?
Not sufficient because of the following reasons.

Comments:
This paper mainly consists of two major discussion points:
  1) Operation of root servers and
  2) Content management of the root zone file.
These two points should not be mixed and confused. Therefore we suggest that SWOT analysis be carried out on these points separately.

Operation of root servers and content management of the zone files are inter-related topics, but this paper is not suitably weighing the latter point. We suggest that this paper should be combined with another paper: "Administration of Internet names and IP Addresses", which treats the latter point.

Does the paper cover the topic with sufficient depth and accuracy?
Not sufficient because of the following reasons.

Comments
1. *The fourth paragraph of page 4 does not fully deny the existence of alternative root server systems, but they are crucial threat to the interoperability of the Internet, hence should never be allowed. This paragraph should be rewritten in this regard.*

2. *The proposed template for issue paper suggests both "ACTORS" and "FORUM" sections, but it seems that is not successful in this paper. In fact, several institutions are described in both sections and these descriptions are not in good accord. Consequently, readers may not understand the meaning of two sections, and the paper itself is not effective enough. One may produce more neat and effective description by forgetting the template.*

3. *Some historical happenings trailing to the foundation of ICANN are explained in the paper, but they are not sufficient to understand the current situation of:*
   (a) ICANN is currently managing the root zone file, and
   (b) ICANN has a contractual relationship with US Government.
   We don't want too much detailed explanations of history, but those two facts are quite important in understanding the current situation surrounding the root server system, and the history should be explained to that extent.

4. *At the end of the second paragraph of page 7, the story of so-called "Green paper" appears, but the logical relation to the ICANN's By-laws in the next paragraph is not apparent. If one recalls what happened at the time, the Green Paper was followed by the "White paper" and the IFWP activity before the establishment ICANN and its recognition by the US Government. These are not included in the historical description. We can not understand the reason and the purpose of omitting these facts.*

5. *There is an explanation about ICANN's By-laws beginning from the third paragraph of*

page 7. The reason and the purpose for the inclusion of this part in the paper are unununderstandable. As a result, the role of the whole ICANN part in the "FORUM" section is not clear. If one wants to explain the history in this part, one should rewrite taking the above (a) and (b) into account.

6. *In the* SWOT *analysis, the reason for the fourth weakness* "RSSAC is advisory" *is not clear.*

7. *In the* SWOT *analysis, the last threat: "Errors in changes to the primary root server could be propagated to all others." is an issue of technical operation, hence we think it is out of scope of Internet Governance.*

8. *In the* SWOT *analysis, the reason for the third strength, "Oversight authority of root server system…" is not clear.*

Does the paper achieve a reasonable balance in weighing relevant matters?
No.

Comments
There is too much emphasis on operational side of the hardware while less focus on content management of the root zone file.

Any other comments

9. *About SWOT Analysis: It may happen that one fact means "Strength" for one person while the same fact means "Weakness" for another person depending upon their viewpoints. Thus, it is very important to clarify which viewpoint each SWOT analysis is based upon.*
   Ideally, the viewpoint should be agreed among the members of the working group and clearly stated in the papers, but in the absence of agreement, each item listed in SWOT analyses should be accompanied by the viewpoint it based upon.
   (We believe this comment is particularly important, but we could find no other place for comments about appropriateness of templates and working style of the WG.)

10. *It will be helpful to mention the nickname "White paper" for the "Statement of Policy" referenced in the second paragraph of "United States Department of Commerce", page 5. The Statement is well known by the nickname in the Internet Community.*

11. *In the SWOT analysis, the third threat about* "alternative root system" *is difficult to understand for those who are not aware of a particular incident in the past concerning an alternative root server system. Perhaps, additional explanation about which range of people the* "general consensus" *should cover in this context will make it easier to understand.*

12. *Two figures in page 11, "Criteria" and "Adequacy" are difficult to understand without pre-knowledge. Acronyms in these figures are also difficult to guess the meanings.*

IGTF-J comment on Multilingualization of Internet Naming System

Has the issue as it applies to the question of Internet Governance been adequately identified?
No. Keywords should not be examined on the same plane as IDN's.

Comments:
Although keywords are examined as one of the mechanisms of Internet naming of non-English languages in this paper, keywords should be considered just one of the applications on top of the domain name system and should not be examined on the same plane as IDN. IDN needs global coordination as one of the mechanisms of Internet naming, i.e., domain name.

As the following comments are based on the above baseline, this comment paper gives very few comments on keywords. However, it does not mean keywords don't have weaknesses or problems. For example, the fact that lack of standardization of the keyword technology is pointed out. This is because the keyword services can be provided without any global standardization or international coordination as they do not offer globally unique name resolution.

As for IDN's, they need to be based on a globally agreed specific technical standard and coordination in the context of naming systems. It is important to examine the issues from the viewpoint of "what is best for the user". If there remains a lack of international understanding of IDN, agreement and implementation standards of IDN will cause tremendous confusion for users. Therefore, an outreach is necessary to enhance understanding of the users.

Does the paper cover the topic with sufficient depth and accuracy?
No. It's flawed in many points.

Comments
Below are some of our comments.
1. *It should be clearly stated that technical standards do not exist for keywords, but do for IDN's.*
2. *It should be stated that IDN's are universally unique although keywords are not.*
3. *It should be stated that the internationalisation of URI (Uniform Resource Indicator), multilingualized version of URL, has also been standardized.*
4. [3.1 What works] *It should be clearly stated that the multilingual TLD is technically viable, although safer implementations to avoid possible risks related to multilingual TLD's are still under development.*
5. [3.1 What works] *IDN services are provided across several ccTLDs, especially in Asian and European ccTLDs, and gTLDs. The paper should give more appropriate knowledge to the readers about this fact.*
6. [3.2 What doesn't work] *There is too much of a concentration on IDN's, while problems on keywords are ignored. Examples of such problems are*
   - keywords are not unique on the Internet
   - non-interoperability. There are no technical standard that exists
   - different user experiences among service providers
   - keywords can only be used for pointing web sites, but cannot be used as a hyperlink in web pages or in applications other than browsing.

7. [3.2 What doesn't work] *It says 74% of IDNs are registered in USA, Japan and Korea. It is completely incorrect because the referred statistics are only for .COM and .NET.*

8. [3.2 What doesn't work] <2nd paragraph> *It should be stated that the client side solution is chosen for IDN because modification of the name server function may be harmful to DNS stability and coherent user experience.*

9. [3.2 What doesn't work] <2nd paragraph> *Among browsers having large market share, only Microsoft Internet Explorer has not implemented IDN functionality. And at the ICANN Cape Town meeting, it was stated by Microsoft that the IDN functionality would be provided in the next version of Windows which is expected to be released in 2006 or even earlier, through one of their Service Pack releases.*

10. [3.2 What doesn't work] <2nd paragraph> *Client software is necessary for client-side keyword solutions. This point is ignored in the paper.*

11. [3.2 What doesn't work] <Page 5, 2nd paragraph> 'Who should be entitled to make policy in linguistic issues' *or* 'global policy is necessary' *are also issues for keywords.*

12. [3.2 What doesn't work] *Currently, we believe that keyword services are successful only in Korea and China.*

13. [3.2 What doesn't work] *An important issue for the deployment of IDN's is ubiquity in deployment. I am currently aware of a keywords solution where if I am in one country and type in a name, I will be directed to a certain site. If I leave that country and access the site again, I will be directed to a completely different site. For a user who does not know how to change the DNS settings in their browser, this would lead to tremendous confusion and lack of ability to go to the site they previously accessed in the other country.*

14. [4.2 Keyword Lookup service] *No policy coordination body?*

15. [5.1.1 IDN] *Is it true that US government supervises ICANN's handling of language tables? We hope WGIG members check whether or not this is a fact.*

16. [5.1.2 Keyword Lookup service] *In general, the keyword service is not bound to a single country as the paper says.*

17. [5.1.2 Keywords Lookup service] *The conflicting issues and problems are not described here.*

18. [5.2.1 b] *We question the validity of the following statement:* "multilingual internet names are the Internet address resources of each country" *We question this because they should sometimes be used in a borderless manner.*

Does the paper achieve a reasonable balance in weighing relevant matters?
No. It is unbalanced and at times incorrect information was given.

Comments
It is too biased in favour of keywords and is incorrect in several points as commented in the previous box. We do not feel this draft reflects a fair comparison of the solutions.

Any other comments