



Asia Pacific Network Information Centre
APNIC Pty Ltd
ABN: 42 081 528 010
6 Cordelia Street
PO Box 3646
South Brisbane
QLD 4101 AUSTRALIA

URL www.apnic.net
Enquiries helpdesk@apnic.net
Accounts billing@apnic.net
Phone +61 7 3858 3100
Fax + 61 7 3858 3199

20/12/2024

Malaysian Communication and Multimedia Commission

MCMC HQ Tower 1, Jalan IMPACT, Cyber 6
63000 Cyberjaya, Selangor Darul Ehsan
MALAYSIA

Attention: Tan Sri Mohamad Salim Bin Fateh Din
Chairman

Re: Assistance for the establishment of a National Internet Registry in Malaysia
SKMM (T)06-NEAM/150.001/JId. 01/37

Dear Chairman,

Thank you for your letter dated 13 November 2024, requesting APNIC to assist and facilitate the Malaysian Communications and Multimedia Commission's (MCMC) intention to establish Malaysia's own National Internet Registry (NIR) as part of MCMC.

As you may know, I have recently assumed the role of APNIC Director General on 1 October 2024. In reviewing the background of this matter, I understand there has been prior correspondence between MCMC and APNIC on the same subject, the latest being from the Chair of APNIC's Executive Council, Mr. Kenny Huang (attached letter dated 30 January 2024), in response to MCMC's letter dated 19 October 2023 [Ref: SKMM (T)06-NEAM/150.001/JId. 01/03].

Notwithstanding the above, I note from your letter and am grateful that MCMC is open to further discussion. As you may know, the APNIC 59 meeting will be held alongside APRICOT 2025 in Petaling Jaya, Malaysia (24-27 February 2025). If your schedule allows, a potential opportunity for such discussions could be held in the lead-up to or during the above dates.

I am committed to working with you to achieve shared goals. APNIC is committed to serving the 380+ members in Malaysia and the region with the trust and confidence they have placed in us. I'd be grateful for any feedback if APNIC's services in Malaysia have fallen short of expectations. Besides the allocation of numbering resources, APNIC plays a role in maintaining a global, open, stable and secure Internet. In this

regard, we need to ensure a healthy Regional Internet Registry ecosystem, failing which the trust in the Internet could fall apart and result in the Internet's fragmentation. I believe MCMC shares the same interest for a global, single, interoperable Internet, and I'd like to explore how we can address MCMC's concerns while maintaining the above.

I will have my team work with Ms. Noor Ilyana Zakaria and Mr. Ruzamri Ruwandi to arrange a meeting. I look forward to meeting with you.

Thank you.

Yours sincerely,



Jia Rong Low
Director General
APNIC

enc.

30/01/2024

Malaysian Communication and Multimedia Commission

MCMC Tower 1, Jalan IMPACT, Cyber 6
63000 Cyberjaya, Selangor Darul Ehsan
MALAYSIA

Attention: Datuk Zulkarnain Mohd Yasin,
Chief Regulatory Officer,

Re: Your enquiry on the status of National Internet Registry ("NIR")
SKMM (T)06-NEAM/150.001/Jld. 01/03

Dear Datuk Zulkarnain,

Thank you for your letter dated 19 October 2023 about your initiatives to accelerate IPv6 deployment in Malaysia and your questions about the existing moratorium by APNIC for establishing new NIRs.

As means for documenting recent interactions between the Malaysian Communication and Multimedia Commission and APNIC on these topics, it is my understanding that on 17 October 2023, members of the Numbering and Electronic Addressing Management Department of MCMC, met with staff members of APNIC to discuss collaboration for IPv6 take-up in Malaysia and discussed the question of whether an NIR in Malaysia could help with that goal. During that conversation, APNIC staff shared with your team that:

1. NIRs are a historical and unique element of APNIC.
2. With some NIRs predating APNIC, they were originally intended to provide addressing services to local communities, with more proximity and customized service, in the local language and currency.
3. NIRs made sense before IPv4 exhaustion due to the high frequency of delegations and the demand for registry services by Internet operators at the time, also to help with conservation of IPv4 space.
4. The model is not suitable for a post IPv4 exhaustion era and is hard for NIRs to be sustainable with their own means: i.e. registration fees.
5. There has not been any interest to create new NIRs for more than a decade, since 2012.
6. Existing NIRs and its members must follow APNIC policies as per contractual membership arrangements.
7. Network operators and prospective members in NIR economies can choose between NIR or APNIC membership; and APNIC is unable to decline membership requests from any organisation which has a demonstrated need for services.
8. Existing NIRs must have interoperable systems with APNIC and are bound by quality of service and technical stability guidelines by APNIC.
9. Decisions about NIRs and the existing moratorium are strictly an APNIC's Executive Council matter.

Shortly after this conversation held via videoconference, I received your enquiry letter about the status of the moratorium on new NIR applications.

On 25 October 2023, on the sidelines of the ICANN 78 meeting in Hamburg, Germany, Mr. Paul Wilson, APNIC’s Director General, and myself, met personally with your team. They explained to us that MCMC has interest in setting-up an NIR in Malaysia for 3 reasons: 1) to have more control over address allocations in Malaysia; 2) to provide easier/cheaper access to addresses; 3) to encourage more IPv6 uptake.

To respond to the above: 1) the presence of an NIR in any economy is unable to provide a localised management or oversight mechanism for the sub total of address space which is used --whether from APNIC members or indeed international corporations with membership in other RIRs. Nevertheless, APNIC can support MCMC with information solutions and systems that can provide real-time visibility and transparency of allocations made in Malaysia should this be needed. 2) As expressed before, the NIR model is not economically feasible for a post IPv4 exhaustion setting, for the NIR itself or for APNIC. Even if direct costs were to be covered, APNIC would be unable to justify the substantial expense of establishing and supporting new NIRs, when the overall benefits to APNIC’s membership (including those in Malaysia) are very limited. 3) MCMC and APNIC --also the APNIC Foundation-- can continue to work together to encourage further IPv6 deployment in Malaysia.

From 25-27 November 2023, MCMC and APNIC collaborated on a technical workshop in Kuala Lumpur to support network operators with their IPv6 deployments. This is not the first collaboration and I certainly hope there will be many more in the future. Just in the past 5 years, there have been 8 training workshops delivered by APNIC in Malaysia --in Selangor, Puchong, Johor Bahru and Kuala Lumpur-- on Internet Resource Management, SDN, Routing, Multihoming and IPv6 deployment. APNIC is keen to strengthen further collaborations with MCMC in support of Internet development and IPv6 deployment in Malaysia.

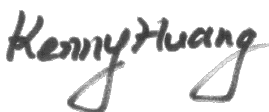
On November 26-28, 2023, the APNIC Executive Council had its annual meeting where we approved a new four-year Strategic Plan for APNIC --until 2027-- and agreed on the activity plan and budget for 2024. As part of this meeting, I included a discussion about NIRs to respond to your letter with clarity and confidence. The minutes of the EC meeting have just been published in the APNIC website and they state:

“It was noted that the Executive Council had received an enquiry regarding the establishment of new National Internet Registries. The EC noted the existing moratorium on the establishment of new NIRs and considered that there should be no change in this policy at this time.”

In conclusion, I firmly believe an NIR would not be the best way to achieve the very well-meant objectives of MCMC. However, as I said above, there are many opportunities for strengthened collaboration between MCMC, APNIC, and the APNIC Foundation that can contribute to the achievement of those objectives.

As you know, APNIC will have its 57th Conference during the APRICOT event in Bangkok, Thailand, from 27 February to 1st March 2024. I hope to have the opportunity to meet you and/or your team on this occasion, and continue discussions on the best way in which APNIC can collaborate further with MCMC to support your goals and advance IPv6 deployments in Malaysia.

Yours faithfully



Kenny Huang
Chair, APNIC Executive Council