



June 3, 2020

National Telecommunications and Information Administration (NTIA)  
U. S. Department of Commerce  
Washington, D. C. 20230

Submitted via email to: [Ms. Aimee Meacham<ameacham@ntia.gov>](mailto:Ms. Aimee Meacham<ameacham@ntia.gov>), and [WTSA2020@ntia.gov](mailto:WTSA2020@ntia.gov)

Docket No. 200504–0126  
RIN 0660–XC045  
Input on Proposals and Positions for the 2020 World  
Telecommunication Standardization Assembly

Dear Ms. Meachum,

The American Registry for Internet Numbers, Ltd. (ARIN) is pleased to submit the following comments in response to your Docket referenced above.

ARIN is a Regional Internet Registry (RIR) incorporated in the Commonwealth of Virginia as a nonprofit, member-based organization that supports the operation and growth of the Internet. ARIN's service region includes Canada, the United States, and many Caribbean and North Atlantic islands. ARIN also coordinates multi-stakeholder community-based policy development, and advances the Internet through informational outreach.

ARIN, as an RIR, is part of the Internet Number Registry System that collectively serves the public good of supporting worldwide Internet operations through a system of globally unique Internet identifiers. These identifiers include the system of "IP addresses", i.e., blocks of unique numbers that are issued to Internet Services Providers (ISPs) globally, to connect customers to the Internet and support the routing of traffic to those customers.

The Internet Numbers Registry System serves as the common directory of all issued Internet number resources. This common directory enables timely communication amongst the people responsible for each network in the global Internet, and thus facilitates the operational coordination that is necessary to quickly resolve Internet technical issues.

ARIN would therefore like to propose the following in regards to ITU-T collaboration and coordination with other Standard Development Organizations (SDOs):

- It is not clear that the ITU-T should undertake work to evolve protocols developed by other SDOs, especially when said SDOs have explicit copyright and change control on the standards they have developed;
- Any work undertaken should be well-coordinated with the respective SDOs; and,

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- ARIN urges caution in that there is significant risk from uncoordinated efforts in this area. ARIN's role as an RIR is predicated on Internet Protocol specifications which are unambiguous, interoperable, and widely supported.

ARIN would like to commend the NTIA and the Department of Commerce on its vision to reduce fragmentation, address barriers to coordination and collaboration, and increase global harmonization and interoperability in the standards area.

Respectfully,

A handwritten signature in black ink, appearing to read "John Curran". The signature is written in a cursive, flowing style.

John Curran  
President and CEO  
American Registry for Internet Numbers (ARIN)