

October 25, 2018

Honorable David J. Redl  
Assistant Secretary for Communication and Information  
National Telecommunications and Information Administration  
U. S. Department of Commerce  
Washington, D. C. 20230

Submitted via email to: [privacyrfc2018@ntia.doc.gov](mailto:privacyrfc2018@ntia.doc.gov)

Docket No. 180821780– 8780–01  
RIN 0660–XC043  
Developing the Administration's Approach to Consumer Privacy

Dear Assistant Secretary Redl,

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 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 by 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, enabling timely communication between the people responsible for each network in the global Internet, and thus facilitating the operational coordination that is necessary to quickly resolve Internet technical issues as they may arise. In order to allow for real-time between operators that do not have any prior relationship, Internet number resource holders are required to provide contact information for their number resources and this contact information is made publicly available via the Internet Numbers Registry System. The publication of contact information is required to fulfill the Internet Numbers Registry System's operational coordination purpose and is carried out in the legitimate interest of the Internet community in supporting the smooth operation of the Internet globally.

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ARIN recognizes the need for effective protection of consumer privacy. ARIN however notes that any national/global approach to this issue may adversely impact the Internet Number Registry System which enables global Internet operation. Specifically, the responsibility for maintaining the necessary public contact information for their number resources in the Internet Numbers Registry System is well understood by the Internet operational community of ISPs and Internet-connected businesses, and should not be abridged inadvertently by any forthcoming USG consumer privacy framework. Particular care is warranted in this regard, given the important function of Internet Number Registry System and in light of its predominantly business (rather than consumer) orientation.

ARIN would like to commend the DoC/NTIA on its vision to reduce fragmentation nationally and increase harmonization and interoperability globally in this important area.

Respectfully,

A handwritten signature in black ink, appearing to read "John Curran". The signature is fluid and cursive, written in a dark ink on a white background.

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