



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

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Malaysian Communication and Multimedia Commission

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

Attention: Tan Sri Mohamad Salim Bin Fateh Din
Chairman

Re: Establishment of Malaysia's National Internet Registry
SKMM (T)06-NEAM/150.001/Jld. 02/04

Dear Chairman,

Further to my letter to you on 19 March 2025, we thank the Malaysian Communications and Multimedia Commission's (MCMC's) continued engagement with APNIC over the course of 2025 regarding your interest in establishing a Malaysian National Internet Registry (NIR).

APNIC remains committed to considering your requests in good faith and with diligence. After careful review, APNIC must advise that it is currently not in a position to process an application to recognise any new NIRs at this time.

The criteria previously used for NIR recognition have been deprecated and no longer reflect the operational and governance requirements of NIRs today. As a result, there is currently no formally adopted process for recognising new NIRs in the APNIC region. Any successor criteria would need to be developed through APNIC's public, bottom-up community consultation process. In the absence of such criteria, processing an application to recognise a Malaysia NIR at this stage would carry a risk of inconsistency and unfairness.

There are current global Internet governance developments and resulting practical constraints that would make opening the above process at this time premature. APNIC is currently, alongside the other Regional Internet Registries (RIRs), committed to the updating of our global governance framework, the output of

which is a RIR Governance Document. The adoption of the RIR Governance Document is expected in late 2026, and implementation of the resulting obligations across the RIRs will require significant change management to ensure the compliance of each RIR and the ongoing stability of the global Internet.

Notably, the RIR Governance Document contemplates APNIC being held accountable for any non-compliance by NIRs. As a result, there will be a number of obligations which must, by necessity, be cascaded down to NIRs. In considering these obligations and the role of NIRs in the APNIC region, it is anticipated that consultation regarding NIRs will be required and, as with the RIRs, consideration of the full life cycle of these organisations.

Further, APNIC seeks to ensure that any future arrangement for new NIRs is viable, sustainable, aligned with the community's priorities, and not detrimental to ongoing compliance with the RIR Governance Document, noting that supporting a new NIR would require ongoing oversight, compliance monitoring, and escalation capabilities to ensure continued alignment with global and regional obligations.

Any future approach must assure technical integrity, security, reliability, and sustainable financial and administrative models consistent with the final requirements of the RIR Governance Document and the expectations of APNIC's Members and community. For example, NIR status carries substantial obligations for security, reliability, and infrastructure - including accurate registry management and consistent policy application. APNIC is a not-for-profit, membership-based organisation that manages Internet number resources and supports Internet development across 56 economies in the region, and in this regard is obliged to ensure that any prospective NIR demonstrates robust operational maturity, long-term organisational stability, and technical competence. These assessments must be made against clear, objective criteria determined through community consultation and reflecting the global standards adopted under the RIR Governance Document.

Given the above, further to the finalization and implementation of the RIR Governance Document, we expect to commence community consultation to develop comparable standards for NIRs to ensure the APNIC NIR system reflects the expectations and standards of the APNIC community as well as the relevant requirements of the RIR Governance Document. This consultation will include consideration of whether the permanent moratorium on NIRs should be maintained or whether new NIRs should be permitted, and, if so, the relevant criteria for doing so.

While APNIC is not in a position to recognise a Malaysian NIR at this stage, this should not be taken as a judgment on Malaysia's objectives; rather, it is a necessary step to ensure that any such recognition is undertaken in a manner that is consistent, fair, transparent and aligned with global governance and APNIC's established, community-driven processes. Our commitment to continuing to provide excellent service and support to our Malaysian APNIC Members remains unchanged.

As with the United Nations General Assembly's recent endorsement of the multistakeholder model for Internet governance, including the decision to make the Internet Governance Forum a permanent forum of the United Nations,¹ we are committed to the multistakeholder model and consider it essential to the ongoing operation of a global, open, stable, and secure Internet. We value Malaysia's participation in the APNIC

¹ <https://digitallibrary.un.org/record/4095872?ln=en&v=pdf>.

community and would welcome MCMC's contributions to the future public consultation on NIRs once the RIR Governance Document has been adopted and implemented.

APNIC remains committed to dialogue with MCMC in good faith. Please feel free to contact us should you or your team have any questions or would like to discuss the above in further detail.

Thank you.

Yours faithfully,

A handwritten signature in black ink that reads "Kenny Huang". The signature is written in a cursive, slightly slanted style.

Kenny Huang

Chair, APNIC Executive Council