BIS Department for Business Innovation & Skills

IPV6 ROLLOUT IN THE UK

A BIS Departmental Report

NOVEMBER 2010

Executive Summary

This report contains the results of research by BIS into the need to facilitate the migration in the Internet from the use of the IPv4 protocol to the IPv6 protocol, primarily because of the impending shortage of IPv4 addresses that will cause problems for the further growth of the Internet and a degradation of services for existing users. The report makes recommendations for the UK to build on to determine the direction to take.

What is the issue?

The Internet Protocol (IP) is the common language used over the Internet and it is running out if its equivalent of telephone numbers, called IPv4 addresses. A new version of the protocol IPv6 with much longer addresses and hence very much greater capacity has been developed and is starting to be introduced. When IPv6 has replaced IPv4 the shortage will be solved, however the problem is how to manage the migration from IPv4 to IPv6. The difficulty is that the two systems are not compatible and therefore to prevent the usefulness of the Internet from being affected all parts of the Internet need to start to use IPv6 in parallel with IPv4 before IPv4 can be withdrawn. This creates a difficult and demanding migration.

How extensive is the problem?

The transition from IPv4 to IPv6 will affect all equipment that makes up the Internet apart from the underlying transmission facilities. To implement IPv6 a change is needed to one relatively small part of the software in each equipment and this means that equipment that does not support IPv6 will have to be replaced or upgraded. Since the lifetime of much Internet equipment is not more than 3-5 years there is considerable scope for the changes to be made as part of the normal equipment renewal cycle.

We estimate that:

- the extra cost of building IPv6 into equipment should not exceed 5%
- the extra cost of running the Internet during the transition will be 10-20%.

These costs will ultimately be met by the users. The issue is the timing and coordination of these changes.

How severe is the current shortage and when will the shortage start to be felt

At present approximately 10% of the total addresses available still remains to be allocated. At the current growth rate of about 8% the remaining capacity will be exhausted by the middle of 2011. But this is not the whole of the story: there are various methods for extending the life of IPv4 such as recovery of unused addresses and increased sharing of addresses. Based on our assessment of the current situation, 4 years would be our best estimate of the additional life for IPv4 from these measures, although this cannot be regarded as definitive.

What happens when IPv4 runs out?

In the absence of IPv6, the existing Internet will continue to run but new users and new content providers will be either be unable to gain access to the Internet or will have to pay more for access or accept lower quality access as a result of increased sharing of IPv4 addresses. Thus the Internet is not heading for a brick wall but for steadily increasing difficulties unless the implementation of IPv6 makes adequate progress.

What incentives are there to drive the migration to IPv6?

IPv6 offers more than a huge increase in address capacity and its other features are generally beneficial, however they can all be implemented in other ways based on IPv4.

Therefore the migration to IPv6 will be driven much more by the need to avoid problems than by the attraction of these other features.

How much do the public users of the Internet need to know about this?

Relatively little. The change will result is slightly different setup instructions for broadband modems but otherwise be invisible to most non-technical users.

What actions is the Internet community already taking?

The major operating systems such as Windows, AppleMAC and LINUX already support IPv6.

The operators that provide the main connectivity backbone of the Internet are in the process of introducing IPv6.

Part of the top level of the Domain Name System that translates names such as <u>www.bis.gov.uk</u> into IP addresses already supports IPv6 but much of the rest of the Domain Name System needs to have IPv6 added.

Few of the servers used for the provision of information and email services in UK currently offer access using IPv6. Only 30 of 25 million UK based name servers have IPv6 addresses.

Of the major telcos that provide access to the Internet, ie BT, Virgin Media and Cable and Wireless, none is yet offering an IPv6 based access service and they are probably 1-2 years away from doing so, but BT is running some trials and pilots and most of its equipment is capable of being upgraded without needing to be totally replaced.

The net result is that there is very little traffic (<1%) using IPv6 at present.

What actions are international bodies and Governments taking?

The IPv6 Forum, which is a world-wide consortium of Internet vendors aiming to promote IPv6, has been raising awareness of the need to migrate to IPv6 for several years.

The OECD published a report in 2007 on "Economic Considerations in the Management of IPv4 and in the Deployment of IPv6" where it recommended that Governments should:

- Work with the private sector and other stakeholders to increase education and awareness and reduce bottlenecks
- · Demonstrate government commitment to adoption of IPv6
- Pursue international co-operation and monitoring IPv6 deployment.

A number of governments are taking action on IPv6.

In August 2005, the Office of Management and Budget in the USA Government established the goal of enabling all Federal government agency network backbones to support the next generation of the Internet Protocol (IPv6) by June 30, 2008 but not clear how far this objective has been met.

In 2007 the Dutch Government financed a study on the Practical Implications of IPv6 and identified the problems of there being no hard deadline for implementation and a lack of skills and sample implementations. It suggested that the Government could create greater expertise and awareness by including IPv6 in its own procurements.

In 2008, the European Commission issued a communication to the European Parliament, the Council and others on "Advancing the Internet: Action Plan for the deployment of Internet Protocol version 6 (IPv6) in Europe". The Action Plan set the objective that IPv6 should be

widely implemented by 2010, with at least "25% of users able to connect to the IPv6 Internet and to access their most important content and service providers without noticing a major difference compared to IPv4". This target will not be met.

The Japanese government has established a Task Force on IPv6 to synchronise and coordinate activities, solve problems and promote awareness.

Overall actions are proceeding rather more slowly than intended.

What action could BIS and the UK take?

BIS will work with the industry to ensure that the essential parts of the Internet in the UK are adapted to support IPv6 in time for the rest of the migration to proceed under normal commercial arrangements and market forces. We are not advocating major changes to Government procurement because we doubt if this would have sufficient impact although it would be of some benefit.

As a starting point we propose three measures:

- a) To bring the various interested parties in UK together within a forum to discuss progress and issues at regular workshops that would initially be hosted at BIS;
- b) This forum should aim to set specific but realistic targets for achieving IPv6 support at all stages within the IPv6 value chain and the main parts of the Internet infrastructure in UK. Where possible we will endeavour to coordinate these targets with other European countries and the USA;
- c) To publish progress on IPv6 migration in UK through an Internet website.

All these activities would depend on the voluntary support of the interested parties. The targets would be set after discussions at the initial workshop.

What will happen if we do nothing?

We risk:

- a later and more haphazard migration to IPv6 that will affect the scope and quality of Internet services in the UK;
- · reduced effectiveness of the Digital Britain programme;
- · being seen to be inactive internationally on an important technological issue.

Does this affect Digital Britain?

Yes. The aim of Digital Britain is to extend broadband Internet access to as many people as possible. This will require additional addresses and if the migration to IPv6 does not progress sufficiently quickly then there will not be enough addresses for some of the new uses. In practice this would result more in a reduction of the scope and quality of services than a compete inability to obtain service. Nevertheless it is highly undesirable and would reflect badly on the UK at an international level.

Contents

1 Intr	1 Introduction			
2 The	e IPv4 Allocation Problem	7		
2.1	Introduction	7		
2.2	Current situation	7		
2.3	Methods of extending the lifetime of IPv4	9		
2.4	Future growth in demand for addresses and eventual exhaustion date	10		
2.5	What happens when IPv4 runs out?	10		
3 The	e structure of the Internet	10		
4 Migration techniques				
4.1	Dual stack	11		
4.2	Network Address Translation (NAT)	13		
4.3	Tunnelling	13		
4.4	Address embedding	13		
4.5 A	pplication-Level Gateways (ALGs)	13		
4.6	Conclusion	14		
5 Mig	pration in different parts of the Internet	14		
5.1	Migration in the backbone	14		
5.2	Migration at the ISPs	14		
5.3	Migration in the telco access systems	14		
5.4	Migration in DNS	15		
5.5	Migration in other servers, email, web	16		
5.6	Migration at the customer networks	16		
5.7	Migration of applications and software	17		
5.8	Timeline	17		
5.9	The migration path	18		
6 Ihe	e costs of migration to IPv6	21		
6.1	Equipment	21		
6.2	Compatibility and Interworking	22		
_ 6.3	Operation	22		
7 Assessing the incentives for the players				
7.1	Advantages of IPv6	23		
7.2	Backbone connectivity and DNS	23		
7.3	ISPs and email and web servers	24		
7.4	l elco access	24		
8 Act	ions being taken	24		
8.1	IPv6 Forum	24		
8.2	OECD	25		
8.3	Actions by the European Commission	25		
8.4	Actions by other governments	25		
9 Pro	posed Actions by BIS	25		
9.1 F	Proposed actions	25		
9.2	Role of the academic community	26		
9.3	Role of Government procurement	26		
9.4	Formation of a steering group in UK	27		
10 C	Conclusions	27		

1 Introduction

The Internet Protocol or standard message structure is the central architectural element in providing the worldwide connectivity of the Internet. This is the "common language" that all the machines connected to the Internet use.

The Internet Protocol uses standardised unique addresses to identify interfaces at the edge of the Internet and these addresses are used to identify where a message is being sent to and where it is being sent from. The address is broadly similar in function to a telephone number.

There are two forms of the Internet Protocol that are used on the Internet today. One is IP version 4 (IPv4), which has been in use for over 25 years., and the overwhelming use of the Internet today is based around IPv4. The other is IP version 6 (IPv6) which was invented in the early 1990s and has had limited uptake to date but is considered to be essential to the longer-term future of the Internet. Very few devices and services use IPv6. The two versions are fundamentally incompatible.

One of the main reasons for the change from IPv4 to IPv6 is that the addresses available for IPv4 are running out and the transition to IPv6 needs to be accelerated to avoid a serious problem of address shortages. IPv6 has a much longer address than IPv4 and hence there are many more IPv6 addresses available - almost an infinite number.

The pool of available new IPv4 addresses is expected to be exhausted by 2011. Once this happens, it will be difficult to introduce new users and services because IPv4 addresses will be hard to obtain. Future growth of the Internet will almost certainly involve much greater uptake and deployment of IPv6 than there has been to date.

The exhaustion of the available IPv4 address space will not be abrupt or cataclysmic from an operational perspective. The Internet will continue to work. Traffic will still flow and existing users will continue to send email, visit web sites and use the other services they enjoy on the Internet. However it will become increasingly difficult to introduce new services or expand networks based on IPv4 because IPv4 addresses will become harder to obtain. There will of course be an abundance of readily available IPv6 addresses.

Many organisations worldwide are discussing this problem and best way to manage the transition from IPv4 to IPv6; they include the European Commission, OECD and the IPv6 Forum. These discussions to date focussed more on promoting general awareness of the IPv4 exhaustion problem and the features of IPv6, than on clarifying and explaining how the migration process should or will work in practice, ie the sequence of events and the decisions at each point, and the motivations of the individual players.

The objectives of this paper are to:

- Explain the issues
- Describe how the process of migration from IPv4 to IPv6 may work
- Evaluate the likely timescale
- · Identify actions that BIS should take to ensure that:
 - o there is adequate information and that
 - the motivations of individual layers are aligned

so that there can be a market led migration that will minimise the problems for service providers and users in the UK.

Action is needed because if we do nothing we risk:

- a later and more haphazard migration to IPv6 that will affect the scope and quality of Internet services in the UK;
- · reduced effectiveness of the Digital Britain programme;
- the UK being seen to be inactive internationally on an important technological issue.

2 The IPv4 Allocation Problem

2.1 Introduction

The master registry for IP addresses is IANA, the Internet Assigned Numbers Authority (www.iana.org). It is responsible for the global coordination of the root of the DNS system, IP addressing, and other Internet protocol resources. IANA has existed since the early days of the network that has become today's Internet. Today it is a part of the Internet Corporation for Assigned Names and Numbers, ICANN (www.icann.org), a not-for-profit public-benefit corporation with participants from all over the world. ICANN co-ordinates the competition and development of policy on the use of the Internet's unique identifiers.

IANA does not allocate IP addresses directly to the general public. It allocates blocks of 16M addresses (called /8s) to the 5 Regional Internet Registries (RIRs) who then distribute those addresses amongst their members, which are mostly ISPs and telcos. The RIRs are non-profit organisations. RIPE NCC, based in Amsterdam (www.ripe.net) is the RIR for Europe, Central Asia and the Middle East. Each RIR develops its own policies on how address resources are managed and allocated.

Address allocation policies at each RIR are broadly similar. Addresses are allocated on the basis of need. When an organisation needs address space, it submits an address plan to the RIR if it obtains addresses directly from the RIR. If is obtains addresses from an ISP, then it would normally submit an address plan to the ISPs and ISPs submit aggregated plans to the RIR The address plan is checked by the RIR to ensure its correctness and that it conforms to the prevailing allocation policies. If all is in order, the address space is assigned to the organisation, which then uses it as it sees fit: for instance by assigning some of that space to its customers. When an RIR runs low on unallocated addresses, it submits a request to IANA, which then assigns it another block of address space.

None of these address assignments involves payment. IANA's services to the RIRs are free. RIRs charge fees to their members for registration services, but not for the allocation of addresses themselves. Some ISPs however charge customers for blocks of address space. These charges vary depending on the ISP, how much address space they have available for assignment and how much space the end customer requests.

The concept of ownership of IP addresses is not established in property law. A recent paper jointly authored by Raymond Plzak, outgoing President and CEO of ARIN the American Registry for Internet Numbers, states:

"There is broad agreement that IP addresses are not "property." They are part of a service, and the IP address is "loaned" as part of the service, to permit a routable address. "

2.2 Current situation

The total size of the IPv4 address space is 256 /8s, in total some 4 billion addresses. 34 of the 256 /8s are still available. Figure 1 shows the current allocation situation. There are four general categories:

- · Allocations still available
- · Allocations used or reserved for experimental purposes
- Historical allocations made before the RIR system was created, some of which may have been substantially greater than were really needed
- Allocations made through the current system of RIRs.

There are currently 34 /8s still available.



Figure 1: Current IPv4 allocations (From: <u>http://www.potaroo.net/tools/ipv4/index.html</u>)

The allocations to the RIRs consist of the following types:

- · Unallocated (pool)
- · Allocated but unadvertised, ie not visible to the rest of the Internet
- · Allocated and advertised, ie actively used and seen by the rest of the Internet.

Some organisations are using public IPv4 addresses internally without advertising them to the rest of the Internet (second type). The reason why they are using public and not private addresses is that they wish to be prepared to connect their networks in the future to the public internet and advertise the addresses. If alternatively they used private addresses then they would need to change their addresses in the future. Consequently no one knows how much of this allocated but unadvertised space is not used at all.

The quantity of allocated but unused addresses in quite large and dates back to allocations of more space than is necessary that were made in the earlier days of the Internet before the RIR system was started. Many of these allocations are held by organisations based in North America.

Figure 2 shows the growth in allocations by IANA to the RIRs.



Figure 2: Growth in allocations to RIRs (From: <u>http://www.potaroo.net/tools/ipv4/index.html</u>)

The following table lists the RIRs.

RIR	Region
AFRINIC	Africa
APNIC	Asia Pacific
ARIN	America
LACNIC	Latin America and Caribbean
RIPE	Europe

Extrapolating at the current growth rate of 8% pa, the available capacity held by IANA will run out in March 2011 and the capacity held by the RIRs in May 2012.

2.3 Methods of extending the lifetime of IPv4

The predictions of running out of addresses in 2011/12 are not the whole of the story. There are various methods for extending the life of IPv4 such as:

- · organisations releasing back unused allocations to the RIRs for re-allocation
- organisations exchanging unused allocations on commercial terms a market in IPv4 addresses.
- organisations using the existing allocations more efficiently, possibly with the incentive of the RIRs introducing charges.

The method for more efficient use involves a Network Address Translator (NAT), which works at the boundary between a private address area and the public address area. This allows a larger quantity of private addresses to be represented on the public Internet by a smaller quantity of public addresses. The relationship between specific private and public addresses changes continually depending on user demand. This can make it difficult to determine which device behind the NAT was using a particular public IP address at a given time.

Many home and small office networks use NAT. All the devices on the local network use private IP addresses that are translated typically to just one public IP address assigned to the

customer by the ISP. Some ISPs are introducing "carrier grade" NAT where the ISP uses private addresses for all its customers and map those addresses into a large block of public address space.

Based on our assessment of the current situation, 4 years would be our best estimate of the additional life for IPv4 from these measures.

2.4 Future growth in demand for addresses and eventual exhaustion date

It is difficult to predict how demand for addresses will grow and the growth rates will be different in different countries depending on the wealth of the country and on the penetration of broadband.

The UK is a reasonably mature broadband market with over 56%¹ of households having broadband and a further 9% having other lower speed forms of Internet access (August 2008 figures). Increased broadband penetration will generate new low volume users and some new demand. Higher access speeds will not necessarily increase numbers of transactions and demand for addresses, therefore the increase in access speeds may produce only a secondary effect.

Management changes within organisations tends to increase demand as growing organisations and new systems require additional addresses and declining organisations and old systems may fail to release the addresses that they were using.

There is a possibility that usage of IPv4 addresses in the UK will reach a plateau within the existing capacity, and so the UK will not run out of IPv4 addresses. However, it is unlikely that global demand will saturate within existing capacity as some large countries still have large growth potential, and so even if the UK does not run out of addresses the world will. Therefore migration to IPv6 will definitely be needed at some stage.

2.5 What happens when IPv4 runs out?

In the absence of IPv6, the existing Internet will continue to run but new users and new content providers will be either be unable to gain access to the Internet or assuming that some price mechanisms have developed, will have to pay more for access or accept lower quality access as a result of increased sharing or public addresses by NATs.

Users and content providers that can only obtain IPv6 addresses will only be able to communicate with other parties that have IPv6 addresses.

3 The structure of the Internet

The Internet consists of:

- A "backbone" connectivity platform provided by a number of relatively large interconnected operators who normally exchange traffic without payments, called peering. These operators may be telcos with their own transmission infrastructure (ducts, fibre) or companies that rent leased lines or other forms of transmission capacity from telcos.
- Many Internet Service Providers (ISPs) who provide access services to large and small customers. These ISPs may exchange traffic using peering between each other locally but they also pay the backbone operators for the global connectivity that the backbone provides

¹ See <u>http://www.statistics.gov.uk/CCI/nugget.asp?ID=8</u>

- The broadband (ADSL, cable and 3G) access systems between the end customers and the ISPs, which are provided by the telcos.
- The Domain Name System (DNS), which is a distributed hierarchical database consisting of many servers whose primary role is to translate domain names into IP addresses. The top levels of DNS are run by bodies such as Nominet that runs .uk.
 Many other servers such as:
 - o email servers that support the email service
 - web servers that store content that is accessed on the web
 - SIP servers that support voice and other media communications

These servers may be either run by users or by ISPs on behalf of their users.

The networks on customers' premises.

The physical arrangements are highly varied, but there is extensive use of third party hosting facilities where a third party runs the physical equipment that is used to provide a wide variety of services and content that is sold by others to provide economies of scale and scope. Some of the physical arrangements are concentrated at Internet Exchanges such as LINX in UK and AMS-IX in Amsterdam where backbone providers, ISPs and hosting organisations all run their equipment in specially designed secure buildings and are able to make easy interconnection to each other.

4 Migration techniques

There are a number of techniques to facilitate migration:

4.1 Dual stack

The Internet uses a 5-layer reference model shown in Figure 5. Each layer is designed to be independent of the others. Therefore a change of technology in one layer should be completely transparent to the layers above and below it.

The lowest layer is the physical level. This is concerned with transmission speeds, radio and optical frequencies, voltages and the characteristics of network cabling.

The link layer deals with the transmission of data over a physical link such as an Ethernet or a wireless network.

The network layer determines how data is organised into packets and routed between endpoints on the network. These may not necessarily be connected to the same physical network. The network layer also assigns a globally unique address to identify a device on that network. For the Internet these are either IPv4 or IPv6 addresses. The transport layer is responsible for re-assembling the data received from the network layer, performing flow control and handling lost packets. Most services on the Internet use Transmission Control Protocol (TCP) to provide reliable connections between devices.

The application layer deals with high-level services such as email or web access. Most of these services are connection-oriented and therefore depend on TCP connections between the client and server. Some Internet applications use lightweight connectionless transport protocols such as UDP (Universal Datagram Protocol) because these are better suited to Voice over IP (VoIP) and streaming audio or video services.

This layering principle is one of the reasons why the Internet is so successful and ubiquitous. The network layer does not care or need to know which physical networks are used. Similarly the transport layer does not need to know or care about how packets get routed across the network. So if the network topology changes or a new data transmission protocol is invented (say Bluetooth or WiFi), the higher level layers can use them without knowing they are there. For example, someone using a web browser on a mobile phone will probably use 3G or GPRS to send data to the telco's network which then transmits it over fibre to an Internet Exchange where it passes through several Ethernets to reach a web server in some ISP's network.

In the context of Internet addressing, this means that in principle traffic that is currently using the IPv4 network layer could move to IPv6 without troubling the transport and network layers above or the physical or link layers beneath. Broadly speaking, these should be unchanged. There will be no need to deploy IPv6-only cabling. And apart from minor changes or upgrades to accommodate IPv6 addresses, application software will not need to be replaced neither for clients nor servers. In fact, most operating systems in use today already support both IPv4 and IPv6. Many applications do too.

Dual stack enables equipment to handle both IPv4 and IPv6 addresses. Since the equipment is designed in a layered structure the existence of alternative protocols at the addressing layer should not affect the upper TCP and application software or lower link layer software. This is illustrated in figure 3.



Figure 3: Dual stack operation

In dual stack operation, both IPv4 and IPv6 packets can be sent intermingled on the same transmission path. This means that in principle IPv6 can be introduced on an existing network without disrupting the existing IPv4 installed base. The routers within the Internet will have different routing tables for IPv4 and IPv6 and so packets will take different paths. The routing tables will have to ensure that IPv6 packets are sent only to other routers that can handle them and not to routers that can handle only IPv4. This is illustrated in figure 4.



Figure 4: Dual stack router network

The genius of the Internet is the Border Gateway Protocol, which automatically updates routing tables as new addresses are advertised, thus the continual process of updating routing tables during the migration will be automated.

4.2 Network Address Translation (NAT)

Just as NAT can be used between private IPv6 addresses within a customer network and public IPv4 addresses in the public Internet, NAT can be used between IPv6 addresses in a customer network and IPv4 addresses in the public Internet or vice versa. Thus NAT could be used to enable a customer network to start using IPv6 addresses, possibly with some tunnels, before their main ISP implements IPv6 with dual stack. This arrangement might for example be used by a university or academic institution that wishes to experiment with IPv6.

4.3 Tunnelling

Tunnelling allows isolated areas of the Internet with one type of address to establish links across areas with the other type of address, so for example areas that use IPv6 can be linked across areas that use IPv4 only. The tunnel needs to be pre-established between the routers at each end of the tunnel. When the router at one end of the tunnel handles an packet with an IPv6 address within a given range relating to the tunnel it will wrap the packet with an IPv4 header containing the IPv4 address of the other end of the tunnel, and route the packet across the IPv4 network to the other end where the IPv4 header will be removed. The packet is then routed further using the IPv6 address. This is illustrated in figure 5.



Figure 5: Tunnelling

Tunnelling is satisfactory as a small scale short term expedient but not as a larger scale solution. Tunnel requires management and this is costly and complex.

4.4 Address embedding

IPv4 addresses can be embedded within an IPv6 address. Part of the IPv6 address space is reserved for this purpose. This would enable an IPv6 only network to route traffic to an IPv4 address. In practice, the routers would probably send the packets as soon as possible to a router on an IPv4 network where the IPv6 header would be replaced with an IPv4 header. This technique may be used late in the migration when only a small amount of IPv4-only equipment is left.

4.5 Application-Level Gateways (ALGs)

Application-Level Gateways are typically proxy systems at the border between two networks, specific to a network service. The gateway is connected to both networks and relays traffic between them. For example, a proxy for web browsing could accept traffic from clients on an IPv4 network, forward them to an IPv6 server and pass the results back to those IPv4 browsers who otherwise would have been unable to contact that web server because it only had an IPv6 address. These solutions do not scale well and can have substantial operating

costs. They are also inflexible because discrete gateways are needed for each distinct network service: email, web, VoIP and so on.

4.6 Conclusion

While there are various techniques for accommodating the hybrid world of IPv4 and IPv6, the main approach to the migration to IPv6 should be based on the introduction of dual stack operation until such time as the availablity of IPv6 is so widespread that the support of IPv4 can be discontinued.

5 Migration in different parts of the Internet

5.1 Migration in the backbone

The backbone of the Internet is the main international transit structure that ISPs connect to. This core infrastructure needs to support IPv6 before migration to IPv6 can start seriously and this means that the backbone routers will need to start to operate in dual stack mode.

Without these developments ISPs will not be able to start to use IPv6 other than between "closed user groups" where they provide all their own resolution facilities and use tunnels across the backbone. Thus adding IPv6 to the backbone is the starting step.

As far as we are aware, most of the major carriers are IPv6 ready but may need to configure or upgrade some management equipment. The core routers are transparent to IPv4 and IPv6. There is very little IPv6 traffic.

5.2 Migration at the ISPs

ISPs need to start to support IPv6 before their customers, the end users, can start to use IPv6. A small number of ISPs (eg Claranet) are already making this step.

There are two options for the ISPs:

- To use the dual stack approach so that each customer access becomes capable of supporting both IPv4 and IPv6 with the customer choosing when they wish to IPv6 (or possibly in the future their own dual stack equipment managing this choice automatically for them).
- To use just IPv6 on the customer side of the ISP but to use a NAT technique to present both IPv4 and IPv6 addresses to the public Internet.

ISPs run both customer access services and email/web hosting services and some may also support DNS servers. It is important that the ISPs start to provide connectivity for those servers that they run themselves and for customers who run their own such servers at a relatively early stage of the migration to IPv6. The support of IPv6 for the majority of customers who are users rather than hosts can follow later.

Few of the servers used for the provision of information and email services in UK currently offer access using IPv6. Only 30 of 25 million UK based name servers have IPv6 addresses.

5.3 Migration in the telco access systems

Many ISPs do not have their own physical access to the customer. They use either local loop unbundling or bitstream services from BT:

• With local loop unbundling, the ISP controls the DSLAM equipment used on the line but with bitstream BT owns the equipment and determines what will be used.

 With bitstream services, BT may also provide some authentication or access control, and may provide some IP-level backhaul and this would need to support IPv6 unless IPv6 could be carried in IPv4 tunnels.

Although in theory the access systems should be transparent to whether IPv4 or IPv6 are used by the ISP, in practice they may not be transparent, and even if they are believed to be transparent, it may be necessary to do some testing to confirm this in practice since there may be features or settings that affect the transparency.

Of the major telcos that provide access to the Internet, ie BT, Virgin Media and Cable and Wireless, none is yet offering an IPv6 based access service and they are probably 1-2 years away from doing so, but BT is running some trials and pilots and most of its equipment is capable of being upgraded without needing to be totally replaced.

The net result is that there is very little traffic (<1%) using IPv6 at present.

5.4 Migration in DNS

DNS is the hierarchical distributed database that translates domain names (eg "bis.gsi.gov.uk") into an IP addresses and is an essential component of the operation of the Internet since most applications such as email and web-browsing work with domain names. DNS servers will need to receive and respond to queries over IPv6. This could be done incrementally as IPv6 becomes available at each location where DNS servers are installed. There will also be a need for DNS servers to publish IPv6 contact data: the IPv6 address of a web server for example. This can and should be done irrespective of whether the DNS server has an IPv6 address or not. DNS servers will also need to receive and respond to queries over IPv6. This could be done incrementally as IPv6 becomes available at each location where DNS servers are installed. At present very few DNS servers have IPv6 connectivity.

The hierarchy of DNS is:

- Root servers: There are 13 logical root servers. The current situation is that 8 of the 13 servers have IPv6 addresses that are published in the root. ² Although most of the others have IPv6 addresses, these cannot be easily added to the root zone because of technical constraints on the size of conventional DNS responses. In effect well over 75% of the physical root servers can handle queries and responses over IPv6.
- Top Level Domains (TLDs): There are many TLDs including both the generic TLDs such as .com .org .biz and the country TLDs such as .uk. These servers, together with any second level servers under country TLDs (eg .co.uk) are in practice the most important and heavily used part of DNS. It is highly desirable that up to date information should be collected and published on the IPv6 readiness of all these servers. The current situation in UK is that 4 of the 11 name servers for .uk have IPv6 addresses. The same DNS infrastructure also serves co.uk, Itd.uk, org.uk and plc.uk. 6 of the 8 name servers for .gov.uk have IPv6 addresses because it piggy-backs on the JANET/UKERNA DNS infrastructure which has IPv6.

Although the core infrastructure DNS servers for the UK have reasonably good IPv6 connectivity, this does not present a true or complete picture. Very few of the delegations beneath these domains have name servers with IPv6 connectivity. There are 14.5 million name servers handling delegations for co.uk. Only 22 have IPv6 addresses. For org.uk, the figure is 14 IPv6 name servers out of 1 million. (These figures are from Nominet)

² <u>http://www.root-servers.org/</u>

5.5 Migration in other servers, email, web

Internet "services" such as email and the world wide web are run using servers. These servers may be run by ISPs or by larger customers, eg many larger companies may run their own email servers whereas smaller ones use hosting services from ISPs.

Where ISPs start to offer IPv6, they would be likely to incorporate IPv6 into their hosting services so that any content uploaded to their services by customers becomes accessible with both IPv4 and IPv6. The domain names that they register for customers would also have both IPv4 and IPv6 addresses added to the DNS. Thus the migration to IPv6 should be invisible in terms of content hosting for users of ISP hosting services.

Larger organisations who use their own email/web hosting facilities will have to introduce their own dual stack arrangements.

Migration of these servers to IPv6 is an important early part of the migration but not as important as DNS.

5.6 Migration at the customer networks

Customer networks (subnets) are normally connected to the Internet via an ADSL or cable router, which includes a NAT so that the customer equipment behind the router uses private addresses.

The current situation is that almost all these routers support IPv4 only but there are a few, mostly from Japan, that support IPv6. (Amazon sells only one router that supports IPv6)

Microsoft has an article encouraging the support of IPv6 in home routers:

http://www.microsoft.com/whdc/device/network/IPv6_IGD.mspx

The IETF has also developed Teredo, which is an IPv6 transition technology that allows IPv6 connectivity across the IPv4 Internet between hosts that are located behind network address translators (NATs).

Microsoft's IPv6 support information is available on:

http://technet.microsoft.com/en-gb/network/bb530961.aspx

When ISPs start to support IPv6, vendors of home routers are likely to start including IPv6 functionality.

How home routers will support IPv6 is not yet clear. There are essentially two options:

- Use dual stack with similar functionality to IPv4 so that the management software does not need to be altered significantly. This would mean that IPv6 would operate with a NAT and this in turn means that some of the advantages claimed for IPv6 will not be realised.
- Operate IPv6 differently without a NAT so that users have more potential to benefit from permanently assigned public IPv6 addresses and can take greater advantage of the new features in IPv6. This approach, however, means that new management software will be needed and the setup of the router may be more complicated. In addition, if NAT is not used then the home becomes more vulnerable and separate firewalls may be needed.

5.7 Migration of applications and software

For most application and server-side software, the introduction of IPv6 will be invisible. It will perform DNS lookups to get the address of some resource, say a web server or a client. This could return IPv4 and IPv6 addresses. Most application software can already accommodate that. Sometimes there may be a configuration setting to choose IPv6 over IPv4 or vice versa.

Badly written or very old software that assumes IP addresses are only 32 bits long will need to be upgraded or replaced. Such software will fail if presented with a 128-bit IPv6 address. One challenge for an organisation introducing IPv6 will be to conduct an audit to identify legacy software that cannot handle IPv6 and then decide what to do about it. In principle, there will be a small administrative and management overhead to ensure most software on servers and desktop or laptop systems are able to use IPv6. This is comparable to the effort that was needed for the Y2K problem, but on a smaller scale because most current applications and systems software already supports IPv6.

Perhaps the biggest challenge for an IPv6 migration will be security considerations. There is widespread use of access control lists (ACLs) to determine how data is routed and which devices get access to resources. These ACLs tend to contain IPv4 addresses. They will need to be reviewed so that "trusted" IPv6 addresses get added and to ensure there are no false positives or negatives on the ACL: ie the resource is only available to trusted users with acceptable IPv4 or IPv6 addresses. Certificates and SSL are widely used to secure connections. These often depend on hostname to address mappings. New certificates should take account of any IPv6 specific names and addresses.

5.8 Timeline

The timeline for the migration path would then appear as shown in figure 6.



Figure 6: Timeline for the migration path

It is important however to understand that the migration process will not be a simple sequential number of coordinated steps. Many different parties will each be taking their own steps in an uncoordinated manner, but overall the sequence will be:

- · backbone and DNS
- · ISPs for email and web servers
- · Retail customer access
- · Customer equipment.

5.9 The migration path

The following diagrams attempt to give a picture of how migration may occur. IPv6 is shown in blue and IPv4 in yellow. The existence of a colour indicates that the protocol is supported and the strength of the colour indicates the volume of traffic using that protocol.



Figure 7 shows the all IPv4 Internet.

Figure 8 shows IPv6 readiness in the backbone and DNS servers.



Core readiness - DNS and backbone Figure 8: IPv6 readiness in the backbone and DNS servers

Figure 9 shows early ISPs supporting IPv6 especially for hosting email and content.



Early ISPs go dual mode and add IPv6 access to hosted content

Figure 9: Early ISPs supporting IPv6

Figure 10 shows most other ISPs following although traffic levels are still low.



Most other ISPs follow, IPv6 traffic still low

Figure 10: Most other ISPs follow

Figure 11 shows users starting to use IPv6 wherever possible.



User migration starts, users use IPv6 where possible

Figure 11: Users start to use IPv6 wherever possible





User migration progresses, IPv6 traffic grows

Figure 12: IPv6 traffic grows





Most users and traffic are now IPv6

Figure 13: Most users use IPv6

Figure 14 shows some ISPs ceasing to support IPv4.



Some ISPs cease to support IPv4

Figure 14: Some ISPs cease to support IPv4

Figure 15 shows the IPv6 based Internet after support of IPv4 is withdrawn.



Support for IPv4 is withdrawn

Figure 15: Support of IPv4 is withdrawn

6 The costs of migration to IPv6

6.1 Equipment

The costs of adding dual stack capability to the Internet backbone routers and to the main servers, eg DNS, email and web servers, is likely to be relatively low. Software to support the IPv6 stack is usually bundled in the core operating system alongside the IPv4 stack. Most UNIX and Linux systems have had this dual stack capability for over a decade. Sometimes an additional charge and/or software upgrade is necessary to add IPv6 capabilities to routers and switches. The additional costs in terms of equipment may be less than 5%. The working life of this sort of equipment is relatively short (3-5 years) and so dual stack equipment can be bought at the next upgrade if it has not already been procured and deployed.

The fact that IPv4 and IPv6 packets can share the same transmission path means that the backbone will not need additional transmission capacity and that the shift in the proportion of traffic types will not require a continual re-dimensioning of the backbone.

Home router equipment may have a longer life than network equipment. Churn is promoted by offers for higher speed broadband that include new routers but there is a wide range of lifetimes of equipment depending on whether or not the users require higher speed services. The need for speeds in excess of 2 Mbit/s is largely driven by interest in video content and given the high penetration of satellite and Freeview in UK this demand is somewhat uncertain. The cost of equipment that supports IPv6 may initially be higher but as volumes grow the cost differences are likely to be minimal and IPv6 will eventually be included in all new routers sold. At present, a DSL router for home or small office use that supports IPv6 is typically £300-500 compared to £25-50 for one that does not. This is not because IPv6 support is expensive. Since there's no mass-market demand, IPv6 does not yet benefit from the economies of scale that commodity hardware enjoys.

PC operating systems such as Windows have frequently issued upgrades and so capabilities can be added or updated automatically. Windows XP and Vista upwards include the basic IPv6 stack as do Macintosh and Linux.

Existing software applications should not be affected since they are normally built on top of another protocol such as TCP or UDP that functions above the IP layer.

6.2 Compatibility and Interworking

Although there are standards for IPv6 this does not ensure that all IPv6 equipment will immediately be compatible. There may be differences in options and other issues where there will be a process of learning before a high level of compatibility and interworking is achieved without further effort.

Compatibility and interworking can be promoted through testing.

These activities are an additional cost to the industry.

With assistance from the European Commission's eEurope programme, ETSI has developed a comprehensive test specification for the Internet Protocol version 6 (IPv6). This specification includes Test Purposes and Test Cases for both conformance and interoperability tests.

Each of the IETF specifications associated with core IPv6 have been analysed to derive over 1000 requirements which characterize IPv6 systems. These requirements have been classified and catalogued.

A valuable role for the Commission would be to promote a Europe-wide marking to indicate that equipment and software supports IPv6. The use of the mark should be based on sufficient practical testing for the mark to be meaningful.

The IPv6 Forum has introduced a mark but it is little used to date. One option is to promote the use of this mark, and this may be better than introducing a different mark.

6.3 Operation

The additional costs of IPv6 operation are likely to be a higher proportion than the additional costs of equipment. The operational costs include:

- · training of technicians
- training of customer support staff
- establishment of new procedures for IPv6

In the earlier phases there will be a skill shortage that will increase the rates for staff with the necessary skills and in turn increase the additional costs further.

The operating cost element of ISPs could increase by say 15% for a few years during the main migration phase.

7 Assessing the incentives for the players

7.1 Advantages of IPv6

To assess the incentives for the players it is necessary to understand the claimed advantages of IPv6.

Advocates of IPv6 such as the IPv6 Forum have attempted to draw attention to the advantages of IPv6 over IPv4. They claim that as well as providing in effect unlimited quantities of addresses so that NAT is no longer needed and every device can have its own permanently assigned address, IPv6 offers better security and better support of "plug and play" setup. These claims typically present examples of highly automated houses with remote mobile control systems. They also claim that NAT is contrary to the fundamental Internet end-to-end principle and that IPv6 will allow this paradigm to be recovered.

. IPv6 will solve the address shortage problem but the other features and examples can be provided on IPv4 and IPv4 could be used equally well to support the digital home and digital automation. Good security can also be achieved on IPv4-based systems. Therefore the advantages of IPv6 are not unique to IPv6 and do not provide a strong incentive to migrate.

A further potentially important factor is that views differ on the issue of NAT. Advocates of IPv6 argue that IPv6 will make NAT redundant but some users see NAT as device that increases security and would not cease to use NAT when they migrate to IPv6. Thus some of the claimed advantages of IPv6 may not be realised for other reasons. This issue is especially uncertain at this stage because there is to date little experience of the best way to manage IPv6 operation in the home.

The conclusion is that the advantages of IPv6 are unlikely to be sufficient in themselves to motivate users, other than specialist users, to migrate to obtain greater functionality. Consequently migration is likely to be driven mainly by the motivation to avoid the difficulties of IPv4 shortages.

Migration to IPv6 may be driven by a wish to avoid problems in the future, rather than a wish to achieve enhanced functionality

7.2 Backbone connectivity and DNS

This area includes:

- · Backbone connectivity
- TLD registries and servers
- · Internet exchanges.

Although the operators of the backbone and the upper level DNS servers do not have a direct short term commercial incentive to introduce dual stack operation, they are likely to introduce it when it is needed as part of their long term commitment to the Internet. Some have already done this.

This appears therefore to be a relatively low risk area, however we recommend that one of the top international bodies could set a deadline for supporting IPv6 in these parts of the Internet and publish a list of all the main players and the dates when they migrate. At a regional level, each RIR could undertake this task and if necessary the Commission could propose this to RIPE. The publication of information is generally an effective tool to increase peer pressure.

7.3 ISPs and email and web servers

ISPs will have two different commercial incentives to migrate to IPv6 and they do not necessarily have to change all their systems at the same time.

- Where ISPs run servers (email, web) for their own and their customers' services, there will start to be commercial pressure from their users to migrate to dual stack operation so that the servers can be used with IPv6.
- Where ISPs provide access to customers, some customers will start to ask for IPv6 access and they will also be affected by the increasing shortage of IPv4 addresses because they will no longer be able to obtain additional allocations.

Thus there should be sufficient natural commercial pressure for ISPs to migrate under commercial forces. However we think that it would be useful to increase the commercial pressure by the publication of national tables of which ISPs support IPv6 and to provide this information separately for:

- Support of IPv6 on servers (email and web)
- Support of IPv6 on access systems.

ISPs are not the only organisations that run servers. Many larger organisations run their own servers and it is important that these servers and the access systems that they use are made compatible with IPv6. The Government itself runs many such servers for information, tax, etc.

Few of the servers used for the provision of information and email services in UK currently offer access using IPv6. Only 30 of 25 million UK based name servers have IPv6 addresses.

7.4 Telco access

Telco access is a potentially important bottleneck that needs further research. This is especially the case where, as in UK, there is a drive to upgrade and extend broadband access and so there is likely to be significant further investment. The forms of access used need testing to ensure that they support IPv6 and need adapting if they do not, otherwise they will form a serious bottleneck to the migration to IPv6.

Of the major telcos that provide access to the Internet, ie BT, Virgin Media and Cable and Wireless, none is yet offering an IPv6 based access service and it is unlikely that such a service will be available widely before mid 2010.

The net result is that there is very little traffic (<1%) using IPv6 at present.

A high priority is to involve the main telcos that provide access in discussions with the rest of the Internet industry over the implementation of IPv6 and including systematic testing to identify and eliminate practical bottlenecks.

8 Actions being taken

8.1 IPv6 Forum

The IPv6 Forum, which is a world-wide consortium of Internet vendors aiming to promote IPv6, has been raising awareness of the need to migrate to IPv6 for several years.

See http://www.ipv6forum.com/.

8.2 OECD

The OECD published a report in 2007 on "Economic Considerations in the Management of IPv4 and in the Deployment of IPv6" where it recommended that Governments should:

- Work with the private sector and other stakeholders to increase education and awareness and reduce bottlenecks
- · Demonstrate government commitment to adoption of IPv6
- Pursue international co-operation and monitoring IPv6 deployment

Our proposals are in line with these recommendations.

8.3 Actions by the European Commission

In 2008, the European Commission issued a communication to the European Parliament, the Council and others on "Advancing the Internet: Action Plan for the deployment of Internet Protocol version 6 (IPv6) in Europe".

The Action Plan set the objective that IPv6 should be widely implemented by 2010, with at least "25% of users able to connect to the IPv6 Internet and to access their most important content and service providers without noticing a major difference compared to IPv4".

8.4 Actions by other governments

A number of governments are taking action on IPv6.

In August 2005, the Office of Management and Budget in the USA Government established the goal of enabling all Federal government agency network backbones to support the next generation of the Internet Protocol Version 6 (IPv6) by 30 June 2008.

In 2007 the Dutch Government financed a study on the Practical Implications of IPv6 and identified the problems of there being no hard deadline for implementation and a lack of skills and sample implementations. It suggested that the Government could create greater expertise and awareness by including IPv6 in its own procurements.

The Japanese government has established a Task Force on IPv6 to synchronise and coordinate activities, solve problems and promote awareness.

9 Proposed Actions by BIS

9.1 Proposed actions

What does BIS need to do to try and ensure that the migration to IPv6 is smooth and that it does not disadvantage the UK Internet community and users?

To date there is some awareness of IPv6 and there are no signs that the UK is lagging behind relative to other countries but the migration has not yet really begun.

The migration path is complex with some steps such as the method of supporting IPv6 in home networks not yet clear. In these circumstances it would be inappropriate to consider any regulatory intervention. There is also some uncertainly about the timing for the migration.

We consider that the primary objective for BIS should be to ensure that the ISPs are able to introduce IPv6 and use it when they need to under market forces. This means

working from the centre outwards to identify and mitigate blockages to the successful transition.

The market forces will be demand for the features of the new protocol (whether essential or not and to whatever degree promoted to the public) and an increasing shortage of IPv4 addresses. It is the ISPs that will be the main controllers of the speed of the migration.

In order to provide this freedom for a market led solution, the UK will need to ensure that:

- The main backbone and DNS servers support IPv6 and that any initial teething troubles are resolved
- The access systems run predominantly by BT and Virgin do not inhibit the adoption of IPv6 by ISPs or subscribers
- All parties have adequate up-to-date information and a forum where issues can be raised, discussed and resolved
- · There are adequate training facilities for the operational and support staff
- · Vendors are able easily to undertake conformance and interworking testing
- Target dates and deadlines are established and lists organisations and their IPv6 readiness are compiled and published.

In terms of enabling a market led migration, BIS should set a timeline for the backbone and access systems to be ready for IPv6. The suggested date is March 2012.

9.2 Role of the academic community

The Internet world has benefited greatly from the contributions made by the academic community. The JANET academic network could play a valuable role as a test bed or early adopter for IPv6. Some UK universities have a high profile in IPv6 developments and research, though this activity is considered experimental and therefore somewhat removed from the responsibilities of operating a production network. There is already some use of IPv6 both by JANET and by UK universities. For instance the web, mail and DNS for UKERNA, the company that operates JANET, all have IPv6 addresses. However it is not clear how much traffic these servers receive over IPv6.

Possible actions by the academic community are:

- To migrate the whole of JANET to IPv6 at the earliest practical opportunity as an operational system to gain operational experience as opposed to conducting experimental research;
- To migrate the networks in schools to IPv6.

Both these actions could be valuable at some stage. They focus on a special segment of the market and operate from a different perspective to our main recommendation of working from the centre outwards to enable market forces to lead to IPv6 implementation. They will add value but not necessarily stimulate a market-led migration.

9.3 Role of Government procurement

It has been suggested that the Government could require all its new IT procurements to include IPv6 and use certain procurements as pilot programmes. This is an approach used in the past to promote other technologies such as OSI, but the results in that instance were disappointing. The difficulty is that it diverts attention from the main objective of the procurement, which could be difficult enough to achieve on its own. Government as a user is not a big enough traffic generator to drive the market.

We would recommend that future procurements should include dual stack software capability wherever possible as a preparation for future migration but that the timing of the actual migration should be remain for the programme managers to decide. This is a "low interference" approach.

The one area where the Government should take action is to ensure that where it runs web servers for public access to its own information these web servers are adapted to support dual stack and access via IPv6 within the next 18 months.

9.4 Formation of a steering group in UK

In order to achieve its objectives, BIS proposes to form a Forum of interested parties with the following terms of reference:

- To facilitate and formulate the implementation of IPv6 in the UK and the process of migrating from IPv4 to IPv6.
- To formulate specific objectives with corresponding deadlines for achieving IPv6 support in the main parts of the Internet infrastructure in UK and thereby to enable a market led migration to IPv6.
- To publish progress on IPv6 migration in UK through an Internet website.

BIS anticipates that a Forum is created to implement a website to publish information relevant to the UK. However the aims of such a forum could be largely achieved by a virtual committee, corresponding by electronic means.

10 Conclusions

The main conclusions of this study are as follows:

- a) The process should be driven by the market rather than Government
- b) IPv4 allocations will run out around mid 2012. Measures to make better use of existing allocations will help and may add the equivalent of another 4 years of growth.
- c) In the absence of IPv6, the existing Internet will continue to run but new users and new content providers will be either be unable to gain access to the Internet, will have to pay more for access or accept lower quality access as a result of increased sharing of IPv4 addresses. Thus the Internet, as currently implemented, is not heading for a brick wall but for steadily increasing difficulties unless the implementation of IPv6 makes adequate and timely progress.
- d) IPv6 offers more than a huge increase in address capacity and its other features are generally beneficial, however they can all be implemented in other ways based on IPv4. Therefore the migration to IPv6 will be driven much more by the need to avoid problems than by the attraction of these other features.
- e) Although there has been awareness of the problem for around a decade, and manufacturers and developers of operations systems have created the capability to support IPv6, there is very little effective implementation so far and negligible IPv6 traffic.
- f) The operators that provide the main connectivity backbone of the Internet are in the process of introducing IPv6.
- g) Part of the top level of the Domain Name System that translates names such as <u>www.bis.gsi.gov.uk</u> into IP addresses already supports IPv6 but much of the rest of the Domain Name System needs to have IPv6 added.
- Few of the servers used for the provision of information and email services in UK currently offer access using IPv6. Less than 100 of the 25 million UK based name servers have IPv6 addresses.

- Of the major telcos that provide access to the Internet, ie BT, Virgin Media and Cable and Wireless, none is yet offering an IPv6 based access service and they are, in our estimation, probably 1-2 years away from doing so. However, BT is running some trials and pilots and most of its equipment is capable of being upgraded without needing to be totally replaced.
- j) Various international bodies such as the OECD and the European Commission and national governments are starting to address the migration issue.

We recommend that:

- BIS should aim to ensure that the essential parts of the Internet in the UK are adapted to support IPv6 in time for the rest of the migration to proceed under normal commercial arrangements and market forces. We are not advocating major changes to Government procurement because we doubt if this would have sufficient impact although it would be of some benefit.
- 2) We propose three specific measures:
 - To bring the various interested parties in UK together, either physically or virtually, to discuss progress and issues at regular workshops that could be facilitated by BIS;
 - To set specific but realistic targets for achieving IPv6 support in the main parts of the Internet infrastructure in UK. Where possible the UK will coordinate these targets with other European countries and the USA;
 - To publish progress on IPv6 migration in UK through an Internet website.

All these activities would depend on the voluntary support of the interested parties. The targets would be set after discussions at the initial workshop.

© Crown copyright 2010

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit http://www.nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gov.uk/doc/open-government-licence/ or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or e-mail: psi@nationalarchives.gsi.gov.uk. This publication is also available on our website at http://www.bis.gov.uk.

This publication is also available on our website at <u>http://www.bis.gov.uk</u> Any enquiries regarding this publication should be sent to:

Department for Business, Innovation and Skills 1 Victoria Street London SW1H 0ET Tel: 020 7215 5000

If you require this publication in an alternative format, email <u>enquiries@bis.gsi.gov.uk</u>, or call 020 7215 5000.

URN 10/1229