

クラウドフレア社からの背景情報について

2018 年 9 月 19 日

一般社団法人 日本ネットワークインフォメーションセンター

最近開催されたインターネット運営関連の会議において、クラウドフレア社の技術者と話す機会を持った。同社がこのタスクフォースの議論に上っていることを述べると、公共政策担当者が紹介され、同担当者との電子メールを通じて情報共有を行うとともに、9月17日(月)に電話会議を持った。

タスクフォース第7回会合の資料をもとに同社が触れられている部分を紹介したところ、日本時間本日(19日)午前に、添付のレターが提供された。詳細はレター本体に委ねることとし、以下に抄訳を示す。

- 1 クラウドフレア社はインターネットのパフォーマンスとセキュリティ増強により、よりよいインターネットを目指すべく事業を行っている。CDN (Content Distribution Network)サービスの他に、セキュリティ増強ソリューション、リバースプロキシサービスなどを、74カ国 152拠点で展開している。
- 1 同社は Web ホスティング事業者ではないため、基本的に内容削除を行うことはできない。同社からのコンテンツの削除は、そのコンテンツの配信非効率化、脆弱化には結びつくものの、当該コンテンツの可用性に影響しない。
- 1 知財権の侵害には、不法コンテンツの申告を受け付ける不正利用情報ページ <https://cloudflare.com/abuse/> を設けるなど、対応を行っている。申告者に対し、懸念解決に必要な情報を自発的に提供している他に、適切な法的プロセスを遵守している。
- 1 現在同社は東京と大阪に設備を持っているが、日本ベースの従業員はいない。しかしながら同社の遵法性やサービスに対する不適切な認識に対しては懸念を持っており、タスクフォース及び日本政府に対して喜んで追加情報を提供する準備がある。タスクフォースに提供されている同社に関する情報や統計データは、その正確性検証のために同社に提供していただくことを、謹んで要請する。

以上



Background Information on Cloudflare for Task Force

We understand that Cloudflare's services were considered in connection with a draft of the Task Force's Intermediate Study Report, which was submitted at the meeting of September 13, 2018. Although we were only advised of your work recently, we appreciate the opportunity to provide background on our services and our approach to abuse.

Cloudflare's Services

Cloudflare is an Internet performance and security company that is on a mission to help build a better Internet. By accelerating and protecting more than 10 million web properties around the world from cyberattack, we improve the security, reliability, and performance of the Internet for everyone. Our customers range from small bloggers to Fortune 500 companies, in all major industries. Cloudflare protects the websites of companies like OKCupid, Steve Madden, and the U.S. Department of State.

Cloudflare serves as a reverse proxy, with pass-through security and optimization services, as well as a content distribution network (CDN). Those who sign up for Cloudflare's free or paid services change their DNS records to place Cloudflare's global network in front of their web properties. Cloudflare then uses its 152 "points of presence" in 74 countries to screen traffic for cybersecurity risks and cache content at the network edge in order to improve website performance.

As part our efforts to build a better, more secure Internet, Cloudflare provides a variety of cybersecurity services for users of our network. Broad access to these services—including encryption of both web traffic and web addressing information, protection from DDoS attack, and protection from cross-site scripting, SQL injection or other vulnerabilities—helps prevent data theft, redirection of web requests, and other tampering. Cloudflare's services also protect our customers from malicious bots and crawlers attempting to scrape or alter the content of their sites.

Cloudflare is not a website hosting provider, and we have no ability to remove material from the Internet that is hosted by others. Materials will remain on a website's host server, and be served to users, regardless of whether that website uses Cloudflare services. Termination of Cloudflare services for a website does not alter the availability of content on a website; it just makes distribution of those materials more inefficient and more vulnerable to cyberattack.



Abuse Process

Because Cloudflare is a reverse proxy, our IP addresses may appear in WHOIS and DNS records for websites using our CDN services. To simplify the process for intellectual rights-holders to assert their rights to the website host, Cloudflare maintains an online abuse page that allows users to report infringing material. This policy is available at cloudflare.com/abuse.

Reports regarding copyright infringement typically request removal of content. As noted above Cloudflare is not a website hosting provider, and we cannot remove material from the Internet that is hosted by others. We therefore forward a copy of abuse reports to those with the ability to address the underlying concern. As described on our abuse page, unless the complaining party requests otherwise, abuse complaints are automatically forwarded to both the website owner and the website hosting company to allow them to take action. The complaining party is generally given information about the website hosting provider so they can follow up about their concerns directly.

Apart from voluntarily providing the complaining party the information necessary for them to address concerns about content with the hosting provider, Cloudflare complies with appropriate legal process.

Presence and Engagement in Japan

Cloudflare currently has equipment (points of presence) in Tokyo and Osaka, but has no employees based in Japan. Despite this lack of significant presence in Japan, we are deeply concerned about inaccurate perceptions of our services and compliance with law. We are therefore happy to provide additional information to the Task Force or the government of Japan about the nature of our services.

To the extent that the Task Force is provided data or statistics about our company or our company's services, Cloudflare respectfully requests that we be provided details of that information so that we can verify the accuracy of the information that is provided to the Task Force. Without information about the reports or the domains that were identified as infringing, we have no ability to assess or gather additional information about the claims.
