

Manufacturing case, jurisdiction must be determined on an active-passive spectrum. In simple terms, the courts should not assume jurisdiction over passive web sites, while courts should assume jurisdiction over an active web site. For web sites in between, the court should consider the degree of interactivity. This approach has been accepted in Canada in *Braintech Inc. v. Kostiuk*. In essence, Mr. Jeffstone pointed out, that there is no single approach to the proliferation of the Internet and its impact on various international issues. He suggested three options: (i) the top-down approach, *i.e.*, single set of international rules; (ii) the bottom-up approach, *i.e.*, rules based on users' needs; and (iii) the "muddle through" approach, *i.e.*, determine small solutions to various problems.

4. Conclusions/Policy Options

It was clear from the discussion there is ambiguity as to actual effect of the Internet on international law. Some speakers believed that indeed the Internet is subverting national borders, while others opposed such view. However, it was clearly reflected that harmonization in national laws dealing with copyright is required to create legal and economic certainty. Such harmonization of laws would also allow courts to assume jurisdiction in a consistent manner.