

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Reporting on Border Gateway Protocol Risk Mitigation Progress)	PS Docket No. 24-146
)	
Secure Internet Routing)	PS Docket No. 22-90

**Comments of
The American Registry for Internet Numbers, Ltd.**

July 17, 2024

The American Registry for Internet Numbers, Ltd.¹ (ARIN) respectfully submits comments to the Federal Communications Commission (the “Commission”) Proposed Rule published in the Federal Register, Vol. 89, No. 117 of 17 June 2024.

Introduction

ARIN thanks The Commission for the opportunity to provide feedback to the proposed rule. We wish to comment on items relevant to this subject as the proposed rule touches on matters pertinent to ARIN’s mission and its role as a provider of tools for secure routing, such as Resource Public Key Infrastructure (RPKI), and services within the secure Internet routing area. These comments are submitted for educational and informational purposes as ARIN does not take a position on the proposed rulemaking as consideration of its merits is primarily a matter to be undertaken by the network operator community.

¹ Established in the United States in 1997, ARIN is a non-profit, member-based organization. As one of the five Regional Internet Registries (RIRs) that cooperate in the provision of a global Internet Number Registry, ARIN is responsible for the management and distribution of Internet number resources, such as IP addresses and ASNs, and provide related services within its service region. ARIN issues Internet number resources and provides the related services to maintain the uniqueness of those resources issued to registrants.

ARIN provides services to over 39,000 customers and has approximately 25,635 members. Customers in ARIN's service region include federal, state, and municipal governments and related agencies, commercial for-profit entities, non-profit organizations, educational and health care institutions, public safety organizations, civil society, and more. ARIN’s services include reverse DNS (Domain Name Services), Resource Public Key Infrastructure (RPKI), Whois and WhoWas, an authenticated Internet Routing Registry, and facilitation of an inclusive, bottom-up Policy Development Process. ARIN coordinates the development of fair, impartial, and technically sound policies by the Internet community for the management of Internet number resources. Additional information about ARIN can be found at www.arin.net.

Comments

ARIN takes notice of the FCC's reference to ARIN and its services and processes in its solicitation of feedback on the proposed rule regarding RPKI services². For clarity on the RPKI services, RPKI is available from ARIN, as well as the other Regional Internet Registries (RIRs)³, in the Hosted and Delegated models.

In the Hosted RPKI model, only direct resource holders, those having been issued direct resources in the ARIN registry, can actively create Route Origin Authorizations (ROAs) for those issued direct resources. In this model, ARIN runs a Certificate Authority (CA), publishes the RPKI repository, and signs all ROAs from resources with the ARIN region.

In the Delegated RPKI model, direct resource holders run their own CA, publish their own RPKI repository, and request from ARIN their own delegated resource certificates. Using their CA, Delegated RPKI participants may then sign ROAs for themselves and their customers.

In its proposed rulemaking, the FCC notes, "ARIN had referred for community consultation a question from one of its members, that was filed in the form of a ticket, asking if reassigned address space holders can register their prefixes with ROAs, and thus take advantage of the benefits of RPKI origin validation;"⁴. While this capability is not available in ARIN's Hosted RPKI service, service providers running their own CA using ARIN's Delegated RPKI service may choose to develop and provide their customers with this capability for their reassigned address space.

The FCC further comments, "ARIN is considering changes in its ROA creation processes to flag instances where attempted ROA registrations raise the possibility of misconfigurations."⁵ ARIN encourages those with comments and suggestions regarding further development of RPKI to use the ARIN Consultation and Suggestion Process (ACSP) program to provide such input and feedback, and notes that the ACSP is one of the principal sources used by ARIN in the prioritization of its product development efforts.

ARIN takes this opportunity to reiterate that a bottom-up, multistakeholder model⁶ is central to ARIN's governance, policy making, and the services and tools it provides. Anyone with an interest in shaping ARIN's operational direction may engage with ARIN directly.

² FCC Proposes Internet Routing Security Reporting Requirements, <https://www.fcc.gov/document/fcc-proposes-internet-routing-security-reporting-requirements-0>, Noticed of Proposed Rulemaking, <https://docs.fcc.gov/public/attachments/FCC-24-62A1.pdfpage>, page 29, paragraph 81, downloaded 10 July 2024.

³ <https://www.nro.net/about/rirs/>

⁴ FCC Proposes Internet Routing Security Reporting Requirements, <https://www.fcc.gov/document/fcc-proposes-internet-routing-security-reporting-requirements-0>, Noticed of Proposed Rulemaking, <https://docs.fcc.gov/public/attachments/FCC-24-62A1.pdfpage>, page 29, paragraph 81, downloaded 10 July 2024.

⁵ FCC Proposes Internet Routing Security Reporting Requirements, <https://www.fcc.gov/document/fcc-proposes-internet-routing-security-reporting-requirements-0>, Noticed of Proposed Rulemaking, <https://docs.fcc.gov/public/attachments/FCC-24-62A1.pdfpage>, page 30, paragraph 81, downloaded 10 July 2024.

⁶ https://icannwiki.org/Multistakeholder_Model

To that end, we wish to highlight two areas of direct community feedback that ARIN provides and which are available to any interested parties that wish to provide input regarding ARIN's registry services (including secure routing services such as RPKI):

- 1.) ARIN facilitates a Policy Development Process, <https://www.arin.net/participate/policy/pdp/>, enabling those interested in Internet number resource (IP addresses and Autonomous System Numbers) management and administration in shaping policies that guide distribution practices; and
- 2.) The ARIN ACSP is available for submitting to non-policy operational and technical considerations to ARIN, <https://www.arin.net/participate/community/acsp/>.

Conclusion

ARIN is grateful for the opportunity to provide comments on the proposed rule regarding the Reporting on Border Gateway Protocol Risk Mitigation Progress. The ongoing work in this area is of utmost importance and is essential in maintaining a robust, stable, reliable, and secure Internet for all users of the Internet, both domestically in the United States and worldwide. We appreciate the Commission's efforts in this regard and remain available to respond to any further questions or comments the Commission may have.

If further information is needed, please contact me or in my absence, ARIN's General Counsel, Michael Abejuela at (703) 227-9840 or mabejuela@arin.net.

Respectfully submitted,



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