ARIN 41

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The Problem Statement

- Some large ISPs assign individuals to be POCs for reassigned blocks without consultation of the individual they are inserting into Whois. For example, during the reassignment/reallocation process, some large ISPs automatically create POCs from their customer's order form. This process is automated for many ISPs and therefore the resulting POCs are not validated prior to being created in the ARIN Whois database. This creates unknowing POCs that have no idea what Whois is or even who ARIN is at the time they receive the annual POC validation email. It can also create multiple POCs per email address causing that same person to receive a multitude of POC Validation emails each year.

The Problem Statement (cont'd)

- This policy proposal seeks to improve the situation where a POC is unwittingly and unintentionally inserted into Whois.

- It also seeks to mitigate the significant amount of time that ARIN staff reports that they spend fielding phone calls from POCs who have no idea they are in Whois.

- Finally, it is hopeful that this proposal will improve the overall POC validation situation, by forcing ISPs and customers to work together to insert proper information into Whois at the time of sub-delegation.

The Policy Proposal

- Insert one new section into NRPM 3:

  - 3.7 New POC Validation Upon Reassignment

  - When an ISP submits a valid reallocation or detailed reassignment request to ARIN which would result in a new POC object being created, ARIN must (before otherwise approving the request) contact the new POC by email for validation. ARIN's notification will, at a minimum, notify the POC of:

The Policy Proposal (cont'd)

- - the information about the organization submitting the record; and
  - the resource(s) to which the POC is being attached; and
  - the organization(s) to which the POC is being attached.

- If the POC validates the request, the request shall be accepted by ARIN and the new objects inserted into Whois. If the POC does not validate the request within 10 days, ARIN must reject the request.

The Path Not Taken

- The original proposal also contained a new section 3.8, which was not included in the Recommended Draft Policy. That provision read:

  - 3.8 Downstream Validation of Simple Reassignments

  - When an ISP submits a valid simple reassignment request to ARIN with an organization name OR postal address that is identical to one or more existing OrgIDs, ARIN will notify the downstream organization and obtain guidance on whether to accept the simple reassignment, or redirect it to one of the existing OrgIDs as a detailed reassignment.

The Path Not Taken (cont'd)

- In addition, ARIN cannot be involved in the contractual relationship between its customer and any of the customer's customers. The ARIN customer may be submitting a simple reassignment, precisely because it wants to maintain control over POC records.

- Examples may include branches located in different states of an entity that may want to use address information corresponding to its head office and or other locations in which it has a presence.

The Path Not Taken (cont'd)

- If there is a dispute with an entity that already has an OrgID with ARIN and its upstream provider on how to register the entity's reassignments, those organizations will have the awareness and knowledge to resolve that issue between themselves.

- POCs constitute a totally different scenario in that they are registrations containing information of individuals who may have no idea who ARIN is and that ARIN is required by policy to send email validations to each of these POCs annually.

The Path Not Taken (cont'd)

- One possible improvement in business processes regarding the NRPM section 3.7 proposed policy text identified by Staff would be if the policy text specified that the Org's Abuse contact would be put on the reallocation or detailed reassignment record and then the request approved. ARIN would issue notification to the proposed new contact and if the new contact validated, the new validated contact record would replace the abuse contact on the reallocation or reassignment.

- This change would result in reducing the number of POCs associated with a single email which would reduce the number of POC validation requests each email receives annually.

The Path Not Taken (cont'd)

- This amendment was not made because it was viewed as amounting to a new and different proposal.

Community Feedback (So Far)

- There is strong support for this proposal on PPML both in principle and as drafted.

Implementation Issues

- This is a major engineering effort for ARIN and will involve significant testing with the community using this new model.

- When the work is completed, there will have to be a period of time where ISPs will have to retool the applications that interface with ARIN before this new system is to be placed into production. At the point this is put into production, all current systems developed by ARIN customers will have to be updated in order to continue working with the new states introduced by this policy.

- ARIN Staff anticipate a significant increase in customer support calls and tickets to follow-up with persons receiving validations emails.

For Discussion

- Does this policy enjoy strong community support as written?

- Does the community view the proposal as complementary to Recommended Draft Policy 2017-3 or mutually exclusive to it?