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Recommended Draft Policy ARIN-2017-12: Require New POC Validation Upon Reassignment

Staff Introduction

History

- **Proposal** submitted:
  - October 2017 (ARIN-prop-247)
- Advanced to **Draft Policy**:
  - November 2017
- Advanced to **Recommended Draft Policy**:
  - March 2018
- Has not yet been presented at an ARIN Meeting
- AC Shepherds:
  - Chris Tacit, Leif Sawyer

Staff and Legal Review (February 2018)

- **Staff Understanding (1/2)**
    - This Draft Policy requires that all requests for reallocation or detailed reassignment that will result in the creation of a new POC object be validated by ARIN prior to approving the request.
    - Validation will be accomplished by contacting the new POC by email. If the contacted POC fails to validate within 10 days ARIN will reject the request.
    - This is a **very** big change to current business processes.

Staff and Legal Review (continued)

- **Staff Understanding (2/2)**
  - In addition, Section 3.8 in the Draft Policy requires staff to notify an organization in a simple reassignment if either the organization name or address is identical to an existing OrgID for the purpose of obtaining guidance as to approve the simple reassignment or redirect it to an existing OrgID as a detailed reassignment.

Staff and Legal Review (continued)

- **Staff Comments (1/10)**
  - The problem statement is vague as to the actual reassignment process which creates the problem. Recommend additional wording that more accurately describes how a POC is created during the reassignment process. Example language could be something like: During the reassignment/reallocation process, some large ISPs automatically create POCs from their customer's order form.

Staff and Legal Review (continued)

- **Staff Comments (2/10)**
  - 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.

Staff and Legal Review (continued)

- **Staff Comments (3/10)**
  - The proposed NRPM 3.7 policy text represents a very significant change to current operations. The largest impact would be on the ARIN Engineering department.
  - This is a major engineering effort and will involve significant testing with the community using this new model. This work has been estimated to take at least 6 months for the planning and development work which does not include the testing and interaction with the community.

Staff and Legal Review (continued)

- **Staff Comments (4/10)**
  - When the work is completed, there will have to be a period of time where ISP's will have to retool their 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.

Staff and Legal Review (continued)

- **Staff Comments (5/10)**
    - The Draft Policy would not have a direct effect on RSD operations as far as processing the requests for reallocations and detailed reassignments due to the fact that they are automated; however, there would be a significant increase in customer support calls and tickets.
    - A conservative estimate would suggest that at least 50% of these requests would require some type of manual follow up from/with the person receiving the validation email.
    - This increase in interaction with organizations that do not have a direct relationship with ARIN could result in the need for additional staffing within RSD.

Staff and Legal Review (continued)

- **Staff Comments (6/10)**
  - One possible improvement in business processes regarding the NRPM section 3.7 proposed policy text 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.

Staff and Legal Review (continued)

- **Staff Comments (7/10)**
  - 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.
  - Today there are several emails that have multiple POCs associated. Here are the numbers from our database:
    - Total email addresses   465,529
    - Email with 5-9 POCs   15,721
    - Email with 10-24 POCs   4,638
    - Email with >25 POCs   1,261

Staff and Legal Review (continued)

- **Staff Comments (8/10)**
    - It is worth noting that if Draft Policy 2017-03 is adopted, which eliminates the requirement for annual POC validation for detailed reassignments, that approximately 77% of the current POC validation load is eliminated:
    - Networks in Whois requiring POC validation:
        - Direct Allocation 23,665 (04%)
        - Direct Assignment 35,755 (05%)
        - Reallocation 89,612 (14%)
        - Detailed Reassignments 511,637 (77%)

Staff and Legal Review (continued)

- **Staff Comments (9/10)**
    - The wording in Draft Policy NRPM section 3.8 is misleading because a simple reassignment results in a customer identifier versus an OrgID.
    - There is no contact information contained in a simple reassignment other than street address that could be used for notification, and thus it does not appear that the proposed NRPM 3.8 policy text is implementable.

Staff and Legal Review (continued)

- **Staff Comments (10/10)**
  - Note also that even if notification were possible, the "OR postal address" in this section may also cause significant problems for some companies as many companies have the same name associated with many different locations and there are several locations that have many companies registered there.
  - This policy could not be implemented as written, but could be implemented with significant effort if the proposed NRPM 3.8 section was removed.

Staff and Legal Review (continued)

- **Legal Assessment**
  - No material legal risk in this policy

Staff and Legal Review (continued)

- **Resource Impact**
    - Implementation of this policy would have extreme resource impact. It is estimated that it would take over 6 ½ months of development work. There will need to be extensive testing performed with the community as well.
    - The following would be needed in order to implement:
        - Updated guidelines and internal procedures
        - Staff training
        - Extensive engineering work will be required

Advisory Council Presentation