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MIAMI, FLORIDA | 15-18 APRIL 2018

**Recommended Draft Policy
ARIN-2017-3: Update to NPRM 3.6:
Annual Whois POC Validation**

Staff Introduction

History

- **Proposal** submitted:
 - March 2017 (ARIN-prop-239)
- Advanced to **Draft Policy**:
 - March 2017
- Advanced to **Recommended Draft Policy**:
 - February 2018
- Presented:
 - ARIN 39
 - ARIN 40
- AC Shepherds:
 - Amy Potter and Alyssa Moore

Staff and Legal Review (February 2018)



- **Staff Understanding (1/2)**

- This Draft Policy

- Establishes the specific Whois Points of Contact (POCs) that are required to be verified annually.
 - Identifies which organizations are covered by this policy according to the type of resources that it holds i.e. direct assignments, direct allocations, AS numbers from ARIN (or one of its predecessor registries) or a reallocation from an upstream ISP.
 - Excludes reassignments made to downstream end user customers.

Staff and Legal Review (continued)



- **Staff Understanding (2/2)**

- This Draft Policy

- Defines the procedure to be followed to ensure the above specified POCs are verified through an email notification on an annual basis.
 - Instructs ARIN staff to marked POC records deemed completely and permanently abandoned or otherwise illegitimate as invalid in Whois.
 - Directs action to be taken if an ADMIN or TECH POC has been marked invalid.

Staff and Legal Review (continued)

- **Staff Comments (1/3)**

- Section 3.6.5. is unclear regarding the scope of the impact to an organization having non-responsive POCs.
- “Any organization lacking a validated Admin or Tech POC will be unable to access the full suite of functionality” fails to specify the allowed/prohibited functionality for organizations lacking a valid contact.
- Absent further clarification, ARIN staff will interpret this to mean that an organization without at least one validated Admin or Tech POC will only be able to access payment and contact update functionality within ARIN Online, regardless of the contact used for access.

Staff and Legal Review (continued)

- **Staff Comments (2/3)**

- For organizations that have at least one valid Admin or Tech contact, the organization will be able to access full functionality of ARIN Online, even if access is via one of its other non-responsive POCs.
- If instead the desired policy outcome is that only a validated Admin or Tech POC may access full ARIN Online functionality, then the policy text should be clarified to that effect.

Staff and Legal Review (continued)



- **Staff Comments (3/3)**

- The proposed policy does not impact ARIN's ability to provide ongoing registry services for number resources, only the ability of impacted organizations to make changes to their number resources and related services.
- This policy could be implemented as written.

Staff and Legal Review (continued)

- **Legal Assessment**

- There are no material legal issues regarding this proposal.

Staff and Legal Review (continued)

- **Resource Impact**

- Implementation of this policy would have minimal resource impact. It is estimated that implementation could occur within **3 months** after ratification by the ARIN Board of Trustees.
- The following would be needed in order to implement:
 - Updated guidelines and internal procedures
 - Staff training
 - Minimal engineering work

Advisory Council Presentation