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

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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 hoped 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 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.

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The Policy Proposal (cont'd)

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.

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.

Status of Proposal

- On May 17, 2018, the ARIN AC, having successfully completed the Policy Development Process for Recommend Draft Policy 2017-12, recommended its adoption to the Board.

- On July 31, 2018, the Board remanded ARIN Recommended Draft Policy 2017-12 to the ARIN Advisory Council. Noting the complexity of the policy, the Board requested a more complete policy assessment of technical soundness, and recommended interviews by the AC with ISPs who make numerous delegation requests including those with IP management platforms, if such interviews have not been already conducted.
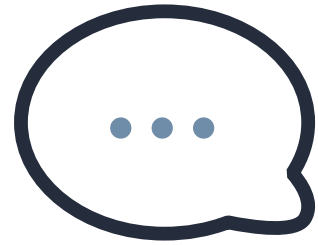
For discussion

- If your organization uses automation to generate detailed customer reassignment SWIPs, would it make the appropriate system changes necessary to continue performing detailed reassignments if RDP 2017-12 is adopted?

- If the answer to the first questions is "yes", what amount of reasonable lead time, if any, would your organization require before implementation of RDP 2017-12 to allow your organization to manage this change?

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Thank you.
Any Questions?

Discussion