



**Recommended Draft Policy 2017-12 -
POC Notification and Validation upon
Reassignment or Reallocation**

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Problem Statement



- Some 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.

Problem Statement (cont'd)



- This policy proposal seeks to prevent the situation where a POC is unwittingly and unintentionally inserted into Whois. Doing so will reduce the significant amount of time that ARIN staff spend fielding phone calls from POCs who have no idea they are in Whois.
- The proposal will improve the overall POC validation situation, by ensuring that all reallocation or detailed reassignment requests are related to a pre-existing receiving organization with at least one valid POC object, and by requesting that any other existing invalid POC objects are validated.

Policy Statement



- Insert one new section into NRPM 3:
 - 3.7 POC Notification and Validation Upon Reassignment or Reallocation
 - When a request for reallocation or detailed reassignment is made to ARIN, the receiving organization must already be in the ARIN database and associated with at least one validated POC object. If there are no validated POC objects associated with the receiving organization, ARIN shall reject the request.

Policy Statement (cont'd)



- In addition to notifying the requester, ARIN will also notify, via email, all POCs associated with the receiving organization, whether the request was successful or not, and will request validation of any invalid POC objects associated with the receiving organization.
- Note: Simple reassignments are made without any linkage to an organization or POC objects in the ARIN database.

Staff and Legal



- This is a large change to the way we currently do business. There are several customers that have automated their reallocation/reassignment process with ARIN following the current model. These changes will add some complexity and possibly additional states to automated systems interacting with ARIN for the reallocation/detailed reassignment process. These changes will require customers requesting reallocation or detailed reassignments to gather and verify information from their customers prior to submitting their requests. These changes will provide a higher degree of privacy protection to the organizations that are having reallocations/detailed reassignments submitted on their behalf. ARIN would be required to notify all POCs requiring validation through email notification whether the request is successful or not.

Staff and Legal



- Overall these changes will result in more accurate information in the ARIN Whois database.
- Draft Policy NRPM section 3.7 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, initially there could be an increase in customer support calls and tickets.
- The development effort for these changes is estimated to take 8 weeks.
- This policy could be implemented as written.
- No legal concerns were expressed.

A bit of history



- The most recent policy statement is much simpler to implement than the original text, which would have required ARIN to contact POCs before attaching reassignments to them
- The original text would have resulted in very significant implementation costs, leading the Board of Trustees to remand the RDP back to the AC

Questions



- Given that there has been very little input on PPML with respect to the current text, does community support for this policy persist?
- Would any ISPs using automation be tempted not to record reassignments and reallocations if this policy was implemented?
- Anything else?



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Thank you.

Any Questions?



Discussion