



**Draft Policy 2011-7**  
**Compliance Requirement**

## 2011-7 - History

1. Origin: ARIN-prop-126 (Jan 2011)
2. AC Shepherds: Chris Grundemann, Owen DeLong
3. AC selected as Draft Policy (May 2011)
4. Revised/current version: 22 Sep 2011
5. Text and assessment online & in Discussion Guide

[https://www.arin.net/policy/proposals/2011\\_7.html](https://www.arin.net/policy/proposals/2011_7.html)

## 2011-7 – Summary

This policy requires ARIN staff to identify customers who are out of compliance with policy, and to withhold services for those who fail to come into compliance within a designated time.

Staff is to contact customers who are out of compliance with policy. Customers have 30 days to respond or reverse DNS services may cease. Customers have 60 days to show progress in making corrections or reverse DNS services will cease. After 90 days reclamation may begin.



## 2011-7 – Status at other RIRs

Nothing similar at the other RIRs

# 2011-7 – Staff Assessment

## Staff Comments: Issues/Concerns?

1. The term “out of compliance” is not well defined anywhere within this policy. Without additional criteria, staff will continue to interpret this term somewhat liberally, and to apply it at our discretion using our best judgment and consideration of existing factors. Only those organizations that we deem to be significantly in violation of existing policy will be flagged for further review and audit.
2. Removing an organization’s reverse DNS may negatively impact their business.

## Implementation: Resource Impact? – Moderate (6-9 mos.)

- New software tools to track the deadlines.
- There will likely be a significant increase in time and workload for the RS team as the potential for a significant increase in resource audits due to non-compliance with IPv6 reassignment requirements is great. May even require additional personnel.
- Updated guidelines and staff training



## 2011-7 – Legal Assessment

This policy has significant legal implications, as it requires ARIN to withdraw services that may impact innocent and bona fide third parties utilizing the resources.

## 2011-7 – PPML Discussion

- **12 posts by 7 people (0 in favor and 0 against)**
  - Wordsmithing the earlier version.
- **Earlier discussion of proposal: 22 posts by 10 people (2 in favor and 2 against)**
- “I too like the sentiment behind the proposal but... ARIN should have fairly broad leeway to determine when a registrant just isn't acting in good faith to return to compliance... When ARIN determines that an organization isn't acting in good faith... Registration revoked. Boom.”
- “Not in favor of this proposal... ARIN should never shut off reverse unless a network is revoked since the possible collateral damage is too high and will likely cause problems for many others depending upon who gets crunked with this proposal.”



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