

American Registry for Internet Numbers, Ltd.

Registration Services Department Audit

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Audit Overview

Baker Tilly, a national accounting and advisory firm, was engaged by the American Registry for Internet Numbers, Ltd. (ARIN) to assess ARIN's current Registration Services Department (RSD or the department) processes for adherence to ARIN's Number Resource Policy Manual (NRPM) in the following areas:

- Internet Protocol (IP) address space allocation, transfer, and database record maintenance (both public and internal) for version 4 (IPv4) and version 6 (IPv6)
- Fraud detection, prevention, and follow-up
- Autonomous system number (ASN) allocation, transfer, and record maintenance

The scope of this audit included testing specific tickets of various customer requests, on a sample basis, to validate that RSD consistently follows the NRPM requirements and internal procedures. All documents reviewed are detailed in Appendix A.

Summary Results

Baker Tilly did not identify any RSD people, processes, or technology out of compliance with the NRPM. The department's collaborative and cross-trained management and staff understand, value, and support ARIN's mission.

Additionally, the department demonstrates continued commitment to ARIN's mission by:

- Continuing to evaluate methods to improve RSD efficiency.
- Revising internal procedures to provide further clarification and consistency of the required steps for processing customer requests.
- Continuing to enhance the functionality of ARIN Online to streamline customer request processing and reduce reliance on separate forms, files, or supplemental documentation.

To further protect against potential fraud and to improve the efficiency of RSD, ARIN has implemented the following procedural changes:

- ARIN no longer requires an initial fee for the distribution of an ASN.
- ARIN now requires a transfer processing fee for all new transfer recipients, which must be paid before the transfer request can be processed.
- ARIN has suspended the self-service function for users to link points of contacts (POCs) to organizations.
- ARIN has established the Research Integrity and Oversight Team (RIOT), comprised of former RSD members, tasked with upholding Section 12 of the NRPM by identifying and reviewing potential cases of fraud or policy violations.
- ARIN has enhanced ARIN Online to allow documents to be uploaded and stored directly within both the ticket and organization profile and has streamlined tracking by enabling functionality to capture important details in the system, rather than maintaining that information in separate repositories.

Baker Tilly identified certain recommended enhancements grouped into the following themes: document the execution of procedures and policy consistently, update internal procedures, and evaluate process efficiencies.

Themes

Baker Tilly identified certain recommended enhancements during the audit. These recommended enhancements are grouped into the following themes with related recommendations for ARIN to consider for improving RSD operations.

#	Theme	Recommendations for Consideration
1	<p>Consistent execution of procedures with supporting documentation – Executing and documenting activities from the NRPM and internal procedures supports uniform processing of customer requests across RSD staff and confirms adherence to established standards.</p>	<p>ARIN has updated many internal processes and procedures to improve the effectiveness and efficiency of handling customer requests, and RSD analysts have increased their documentation of executed policies and procedures.</p> <p>To reinforce this progress, ARIN should consider offering refresher training for RSD staff to review updated procedures and reemphasize the importance of consistently executing internal processes, including thoroughly documenting conclusions for customer requests.</p>
2	<p>Up-to-date internal procedures – Documented internal procedures that are up-to-date and reflect RSD current operations support the equitable processing of customer request tickets.</p>	<p>ARIN has improved internal procedures by clarifying the required steps for customer request ticket processing.</p> <p>To continue enhancing internal procedures, ARIN should consider further updates to indicate which steps may be substituted with alternate actions and documentation under specific conditions.</p>
3	<p>System enabled processing efficiency – Specialized ticket types in ARIN Online improve consistency and efficiency by aligning workflows with the unique requirements of complex customer request types.</p>	<p>ARIN has improved system efficiency by adding functionality to ARIN Online that reduced the need for separate supplemental documentation repositories.</p> <p>To continue enhancing system efficiency, ARIN should consider further updates to ARIN Online by introducing new ticket templates for certain specialized requests.</p>

Appendix A: Documentation Reviewed

Baker Tilly reviewed the following documentation:

- September 16, 2023 – August 31, 2025 ARIN Online Tickets [on a sample basis]
- September 16, 2023 – August 31, 2025 Transfer Sum Files [on a sample basis]
- September 16, 2023 – August 31, 2025 Transfer Worksheets [on a sample basis]
- 8.2 Mergers, Acquisitions, and Reorganizations Internal Procedures
- 8.3 Recipient Transfer Internal Procedures
- 8.3 Source Transfer Internal Procedures
- 8.4 Inter-RIR Transfers from ARIN – Source Internal Procedures
- 8.4 Inter-RIR Transfers to ARIN – Recipient Internal Procedures
- Approving an 8.3 Transfer Request Internal Procedures
- ASN Requests Internal Procedures
- IPv4 End User Additional Request Internal Procedures
- IPv4 End User Initial Request Internal Procedures
- IPv4 ISP Additional Request Internal Procedures
- IPv4 ISP Initial Request Internal Procedures
- IPv6 Requests Internal Procedures
- Number Resource Policy Manual
- Org Create with RSA Internal Procedures
- Org Name Changes Internal Procedures
- Org Recovery Internal Procedures
- POC Link Suspension Internal Procedures
- POC Recovery Internal Procedures
- Transfer Distribution Process Internal Procedures