

Recommended Draft Policy ARIN-2023-4

Modernization of Registration Requirements

Daniel Schatte and Alicia Trotman





Problem Statement

Current Text (17 January 2024)

Registration is central to the value provided by ARIN to the community. Registry quality depends greatly upon the timely registration of reassignments from ISPs to end users. The motivation for registration has waned since the depletion of the free pool. At the same time, privacy laws have been introduced in many jurisdictions across ARIN's service region which constrain registration in certain cases. This combination of forces has generally discouraged many ISPs from registering reassignments. Registration remains vital to a number of stakeholders, including law enforcement and network operators.





Problem Statement

This proposal aims to modernize the registration-related policies in Section 4 by introducing language that is meant to make registration requirements more adaptable to changing privacy laws, while reminding ISPs of the importance of registration when feasible for the benefit of the community.

Policy Statement



In section 4.2.3.7.1,

Replace

“Each IPv4 reassignment or reallocation containing a /29 or more addresses shall be registered via SWIP or a directory services system which meets the standards set forth in section 3.2.”

With

“Each IPv4 reassignment or reallocation containing a /29 or more addresses shall be registered **in the WHOIS directory** via SWIP, or a directory services system which meets the standards set forth in section 3.2, **within 14 days.**”

Retire section 4.2.3.7.2 Reassignments and Reallocations Visible Within Seven Days

Policy Statement



Rename 6.5.5.1

From

“Reassignment Information”

To

“Reassignment **and Reallocation** Information”

Policy Statement



In section 6.5.5.1,

Replace

“Each static IPv6 reassignment or reallocation containing a /47 or more addresses, or subdelegation of any size that will be individually announced, shall be registered in the WHOIS directory via SWIP or a distributed service which meets the standards set forth in section 3.2. Reassignment and reallocation registrations shall include each client’s organizational information, except where specifically exempted by this policy.”

With

“Each static IPv6 reassignment or reallocation containing a /47 or more addresses, or subdelegation of any size that will be individually announced, shall be registered in the WHOIS directory via SWIP, or a distributed service which meets the standards set forth in section 3.2, **within 14 days**. Reassignment and reallocation registrations shall include each client’s organizational information, except where specifically exempted by this policy.”

Retire section 6.5.5.2 Reassignments and Reallocations Visible Within Seven Days

History



Action	Date
Proposal	5 June 2023
Draft Policy	25 July 2023
Revised	21 September 2023
Recommended Draft Policy	28 December 2023
Revised	17 January 2024

Recommended Draft Policy ARIN-2023-4: Modernization of Registration Requirements

Staff and Legal Review



Staff and Legal Review (6 November 2023)

Staff Understanding:

This policy extends the requirement to create Reassignment and Reallocation records from 7 days to 14 days. The policy text is clear and understandable. Staff agrees with Legal's comment.

Implementable as Written? Implementable with Legal's concerns addressed.

Impact on ARIN Registry Operations and Services: None

Staff and Legal Review



Legal Review:

Legal has a material legal issue with the inclusion of “to the extent permitted and manner provided by applicable law” in proposed sections 4.2.3.7.1 and 6.5.5.1. Section 1.1 of the Policy Development Process (PDP) addresses generally that all policies must be consistent with applicable laws and regulations. Since the goal of the PDP is to create and update the policies that ARIN uses to administer Internet Number Resources, any such reference to applicable law is unnecessary and could create ambiguity and inconsistencies.



Staff and Legal Review

Implementation Timeframe Estimate: Three months

Implementation Requirements:

- Staff training
- Updates to public documentation
- Updates to internal procedures and guidelines

Proposal/Draft Policy Text Assessed: 21 September 2023

AC Assessment of Conformance with the Principles of Internet Number Resource Policy:

Draft Policy ARIN-2023-4: Modernization of Registration Requirements, conforms to the principles of the ARIN Policy Development Process. This draft policy is found to be fair, impartial and technically sound. Based on community feedback and AC discussion we motion to move ARIN-2023-4: Modernization of Registration Requirements to Recommended Draft. If adopted this policy aims to modernize the registration related policies in Section 4.

Policy Impact



This policy extends the requirement to create Reassignment and Reallocation records from seven days to 14 days.

Community Feedback



- Since the terms "WHOIS " and "SWIP" are being replaced by new modern protocols and methods, the language within the Recommended Draft Policy should be updated to reflect those new terms or use of generic terms such as directory services or registration records.
- Would it be feasible to generic-ize as much as possible (even across the entire PPML?) and then have a single section that defines the current best practice examples of the generic terms? e.g. replace "WHOIS and SWIP" with "Directory Services" but then elsewhere note that WHOIS and SWIP are current examples of "Directory Services" so there is still some reference for those that are used to those terms. When a new specific protocol or technology comes about, just that one section could be updated to "WHOIS, SWIP, and SuperNewThing"



QUESTION(S) FOR THE COMMUNITY

Do you support this policy as written?

What changes would you suggest if you do not support the policy as written?

Thank You

Questions or Comments?

