

ARIN

XXXIX



22-25 April 2012 - Vancouver, BC

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. Presented at ARIN 28
5. Revised/current version: 22 Feb 2012
6. Text and assessment online & in Discussion Guide
https://www.arin.net/policy/proposals/2011_7.html

2011-7 – Summary

- This proposal requires ARIN staff to identify customers who are out of compliance with policy, and to eventually 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, and, 60 days to demonstrate they've begun to take corrective measures.
 - If either of these criteria is not met, the policy instructs staff to cease providing reverse DNS services to the customer or to begin reclamation efforts after 90 days.



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 and/or reclaiming their IP number resources will be likely to have a negative impact on their ability to conduct 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. Any revocation made pursuant to this revised policy could result in litigation.



2011-7 – PPML Discussion

- **22 posts by 13 people (none in favor and 3 against)**
 - “I'm uncomfortable *requiring* ARIN to stop providing reverse DNS services. If we want to give ARIN permission to do so, fine. (I don't think they'll abuse that tool, or even use it much.) But I'm still unconvinced that requiring them to do so serves any useful purpose.”
 - “A breach of the RSA is a legal issue, not a technical one.”
 - “... I would simply return PTR records like “THIS-IP-ADDRESS-SPACE-IS-STALE-OR-HIJACKED-VISIT-WWW.ARIN.NET””
 - “...it would be nice if it referred to a web page that described exactly what they needed to do to correct the situation.”

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