

Recommended Draft Policy ARIN-2017-12: POC Notification and Validation Upon Reassignment or Reallocation

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

This recommended draft policy: (1) enables fair and impartial number administration as it ensures that ARIN has the means to communicate with organizations receiving reallocations or detailed reassignments, and does so in a clear, complete, concise and unambiguous manner; (2) is technically sound in that it supports ARIN's ability to maintain the unique registration of Internet number resources; and (3) has community support.

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.

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.

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 notes for June 20 Board Meeting:

- **ARIN Resource Impact** – The staff assessment notes that the development effort is estimated to take about 8 weeks of work and there will need to be extensive testing performed with the community, as well. It is estimated that this policy could be implemented approximately 6 months after ratification by the ARIN Board of Trustees. It is further noted that the development effort for this final version of the policy will require much less development than the original version considered last year.
- **ARIN Legal Assessment** – The legal assessment notes there is no material legal risk in this policy.
- **PDP Conformance** – The President notes that the ARIN PDP has been properly followed, and that all community comments received during last call were in support of the policy.