

Draft Policy ARIN-2022-3:

Remove Officer Attestation Requirement for 8.5.5

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Shepherds: Matthew Wilder, Joe Provo

History:

[Proposal](#)

6 June 2022

[Draft Policy](#)

21 June 2022



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Latest Staff and Legal Review (15 August 2022)

- **Staff Understanding:** ARIN-2022-3 would remove the officer attestation requirement for organizations qualifying for initial transfers larger than a /24 (ARIN's present minimum IPv4 transfer size) or additional transfers. For reference, this requirement became part of the NRPM Section 8 in February 2017 and is not currently in IP address or ASN allocation policy. The requirement was removed from operational practice for IP address and ASN allocation requests via Consultation 2021.04 Retiring the Officer Attestation Requirement. The policy text is clear and understandable.
- **Implementable as Written?:** Yes



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Latest Staff and Legal Review (15 August 2022)

- **Impact on ARIN Registry Operations and Services:** Minor updates within ARIN Online will need to be made to remove attestation language.
- **Legal Review:** No material legal issue. Removal of the officer attestation would not materially impact ARIN's ability to pursue cases of fraud.
- **Implementation Timeframe Estimate:** 3 months
- **Implementation Requirements:**
 - Updates to ARIN Online
 - Staff training
 - Updates to public documentation
 - Updates to internal procedures and guidelines



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Current Text (21 June 2022)

- **Problem Statement:**

Requiring an officer attestation requires unnecessary resources and increases the time to complete an IPv4 transfer.

- **Policy Statement:**

8.5.5. Block Size

Organizations may qualify for the transfer of a larger initial block, or an additional block, by providing documentation to ARIN which details the use of at least 50% of the requested IPv4 block size within 24 months.

Removing “An officer of the organization shall attest to the documentation provided to ARIN.”



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Current Text (21 June 2022)

- **Timetable for Implementation:** Immediate
- **Comments:**
 - This is the only remaining mention outside Section 9 (which makes good use of the restrictions it has).
 - Due to the cost of IPv4 at this time, it is safe to say that someone of authority is aware of this transaction without having them provide an attestation.



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Related: Consultation 2021.04 Retiring the Officer Attestation Requirement

- **Consultation Description:** Officer Attestation was introduced in 2007 in preparation for the depletion of IPv4 Addresses. ARIN required officer attestation for all requests that involve a needs analysis. However, conditions changed since the requirement was established and ARIN believes that the Officer Attestation for resource request tickets is no longer necessary.
- **Resulting ARIN Actions:** ARIN retired Officer Attestation for all requests involving needs analysis (waiting list requests, NRPM 4.4 micro-allocations, NRPM 4.10 IPv6 transition, IPv6 requests, and transfer recipient requests).
- **Exclusions:** The change to remove the Officer Attestation requirement does not apply to circumstances specified in the Number Resource Policy Manual (NRPM).



ARIN-2022-3 PPML Statements

Statements in Support:

- Gaining officer attention is a challenge at organizations of significant scale
- Removing non-essential verbiage from the NRPM makes it clearer and easier to understand

Statements in Opposition:

- Officer attestation is a valuable tool in addressing resource fraud
- [Officer attestation promotes] substantial organization awareness...helping with Legacy Resource Service Agreements (LRSA)
- [Officer attestation] provides a form of risk mitigation both for organizations and for ARIN



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Questions for the Community

1. Do you support the policy as written?
2. Do you have any other thoughts and feedback regarding Officer Attestation?

Any Questions



Discussion