Problem Statement

- There are over 600,000 POCs registered in Whois that are only associated with indirect assignments (reassignments) and indirect allocations (reallocations). NRPM 3.6 requires ARIN to contact all 600,000+ of these every year to validate the POC information. This is problematic for a few reasons:

Problem Statement (cont'd)

- ARIN does not have business relationships with these POCs. By conducting POC validation via email, ARIN is sending Unsolicited Commercial Emails. Further, because of NRPM 3.6.1, ARIN cannot offer an opt-out mechanism. Finally, ARIN's resultant listing on anti-spam lists causes unacceptable damage to ARIN's ability to conduct ordinary business over email.

Problem Statement (cont'd)

- ARIN has previously reported that POC validation for reassignments causes tremendous work for the staff. It receives many angry phone calls and emails about the POC validation process. The author believes that ARIN staff should be focused on POC validation efforts for directly issued resources, as that has more value to Internet operations and law enforcement than end-user POC information.

Policy Statement – Current Language

- During ARIN's annual Whois POC validation, an email will be sent to every POC in the Whois database. Each POC will have a maximum of 60 days to respond with an affirmative that their Whois contact information is correct and complete. Unresponsive POC email addresses shall be marked as such in the database. If ARIN staff deems a POC to be completely and permanently abandoned or otherwise illegitimate, the POC record shall be marked invalid. ARIN will maintain, and make readily available to the community, a current list of number resources with no valid POC; this data will be subject to the current bulk Whois policy.

Policy Statement – Proposed Language

- During ARIN's annual Whois POC validation, an email will be sent to every POC that is a contact for a direct assignment, direct allocation, reallocation, and AS number, and their associated OrgIDs. Each POC will have a maximum of 60 days to respond with an affirmative that their Whois contact information is correct and complete. Unresponsive POC email addresses shall be marked as such in the database. If ARIN staff deems a POC to be completely and permanently abandoned or otherwise illegitimate, the POC record shall be marked invalid. ARIN will maintain, and make readily available to the community, a current list of number resources with no valid POC; this data will be subject to the current bulk Whois policy.

Community Feedback on PPML

- A lot of opposition to the proposal has been expressed on PPML.

- Much of it relates to the need to continue the POC validation process as is in order not to degrade the accuracy of Whois.

- If ICANN (or more precisely, registrars and resellers) can do this for domain names, why can't ARIN figure out how to do it for numbering resources?

- Others stressed that an accurate Whois is important for law enforcement.

Community Feedback on PPML

- Some alternate suggestions were made to address the problem statement including:
  - **Sampling instead of reaching out to every POC**
  - **Automating the validation email process**
  - **Validating POC record upon creation to ensure initial accuracy**
  - **Rewriting the POC validation request email so it reads less "spammy" (which does not require a policy change)**
  - **Defining a business relationship with indirect POCs to avoid having validation email labelled as spam**
  - **Avoiding the creation of multiple unnecessary POC records**

Questions about the Problem Statement

- Is the portion of the problem statement claiming that POC validation emails constitute Unsolicited Commercial Emails a correct legal statement in any jurisdiction(s) within the ARIN region?

- Is there any evidence in support of the claim in the problem statement that ARIN's listing on anti-spam lists causes unacceptable damage to ARIN's ability to conduct ordinary business over email?

Next Steps

- Does the Community want us to continue working on the problem?

- Does the problem statement need to be modified?

- Would a different policy proposal address the problem better?

- If so, what would that proposal be?

Next Steps (cont'd)

- An alternative proposal that seemed to generate considerable consensus on PPML was ensuring that ARIN validates new POCs pointed at an organization before they are actually placed in the database or attached to resources (i.e., upon creation) – what does the Community think about this?

- To what extent does Draft Policy 2017-3 address the problem statement of Draft Policy 2016-8?