



## **Draft Policy 2017-3**

Update to NPRM 3.6: Annual Whois POC Validation

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# Problem Statement

## ARIN 2017-3



- Out-of-date and inaccurate information in the Whois database makes addressing abusive and illegal activity difficult.
- Identifying who to reach out to to address an issue is problematic without
  - The appropriate contact listed as a POC
  - Correct contact information for that contact
- Upstream ISPs SWIPing reallocations often create POCs listing the wrong contact for the reallocated space.
- Law enforcement agencies need to be able to identify and contact the ISP closest to the end user.
- Inaccurate and out of date Whois information can
  - Slow down LE's ability to respond to illegal and abusive activity
  - Waste operator time and resources responding to misdirected legal requests
  - Make the resource holder a more attractive target for hijackers

# Current Policy Text

## ARIN 2017-3



- NRPM section 3.6.1 attempts to ensure the accuracy of POC information by requiring that an annual email be sent to every POC in the Whois database asking them to validate their POC information.
  - Each POC has 60 days to reply
  - Unresponsive POCs marked as such in database
  - If staff deems a POC to be completely and permanently abandoned or otherwise illegitimate, the POC shall be marked invalid

# Previous Draft

## ARIN 2017-3



Sought to improve the current POC validation process by...

- Limiting the scope of required participants
  - Instead of applying to every POC in the Whois database, it applies to the
    - Tech
    - Admin
    - NOC, and
    - Abuse POCs
  - ...of organizations holding a direct assignment, direct allocation, AS number, or reallocation. (i.e. not to POCs attached to reassignments)
- Adding teeth to incentivize validation
  - POCs that do not respond within 60 days are marked as “non-responsive”
  - After an additional 90 days, ARIN’s staff after thorough research and analysis, will mark those non validated, abandoned or otherwise illegitimate POC records “invalid”.
  - **Records marked as invalid will be taken out of reverse DNS and their associated resources will be removed from the public Whois**
    - Responses to this particular set of teeth were largely negative

# Current Draft

## ARIN 2017-3



- Maintains the same limitations on the scope of required participants in the annual validation process as the previous draft
- Takes a less extreme approach to providing teeth:
  - POCs that do not respond within 60 days marked as “non-responsive”
  - After an additional ninety (90) days after the Point of Contact record has been marked as “non-responsive”, ARIN's staff after thorough research and analysis, will mark those non validated, abandoned or otherwise illegitimate POC records “invalid”
  - Organizations lacking a valid Tech or Admin POC will lose access to their ARIN Online account until a Tech or Admin POC has been validated.



# Questions & Discussion ARIN 2017-3

- Will taking away access to ARIN Online until POCs are validated increase the number of validated POCs?
- If yes, will the validation that occurs be meaningful (i.e. will the appropriate contact for the resources be listed, or will someone just click through to validate without confirming the information is correct?)
- Is there a better solution?