

Policy Experience Report

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The PDP Cycle

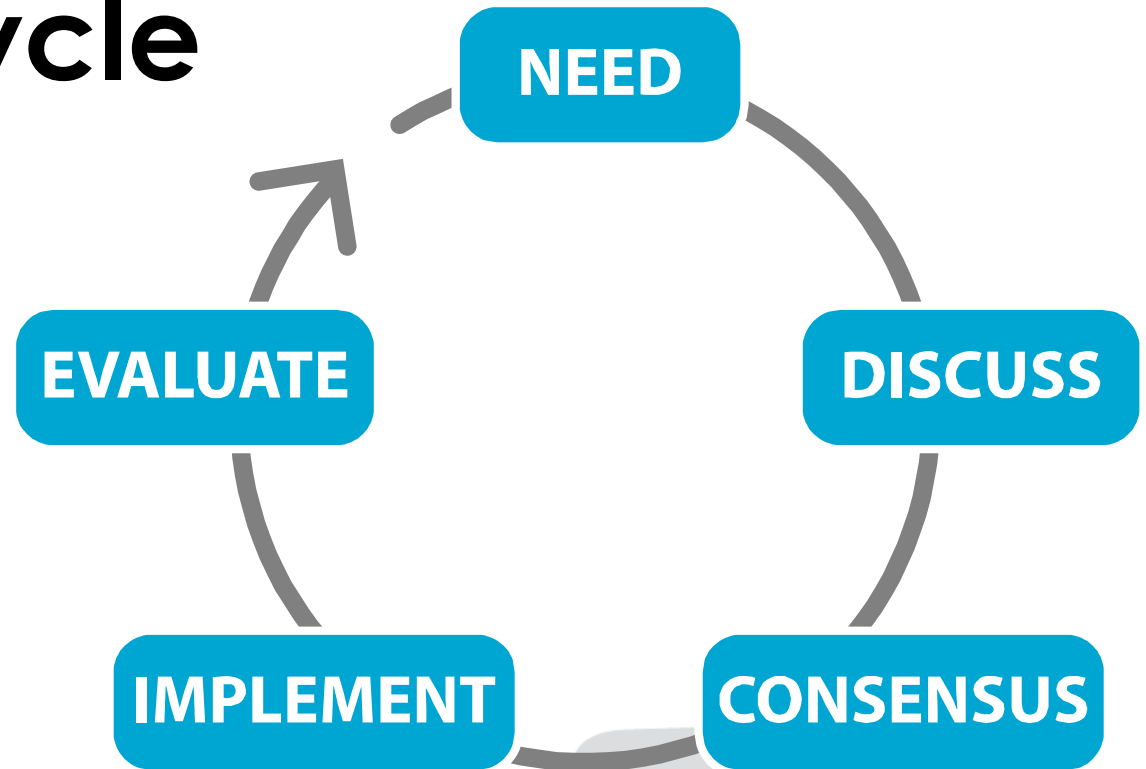
Need

Discuss

Consensus

Implement

Evaluate



<https://www.arin.net/policy/pdp.html>

Purpose

- **Review existing policies**
 - Ambiguous text/Inconsistencies/Gaps/Effectiveness
- **Identify areas where new or modified policy may be needed**
 - Operational experience
 - Customer feedback
- **Provide feedback to community**
- **Make recommendations**



Policies Reviewed

- **Identify Invalid WHOIS POCs (2008-7)**
- **M&A Transfers (NRPM 8.2)**



Identify Invalid WHOIS POCs (2008-7)

“During ARIN’s annual WHOIS POC validation, an e-mail will be sent to every POC in the WHOIS database.”

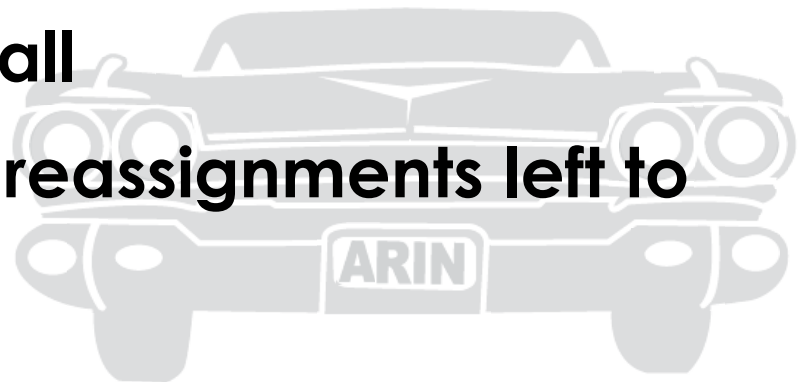


Key phrase here is the requirement to contact “every POC in the WHOIS database”

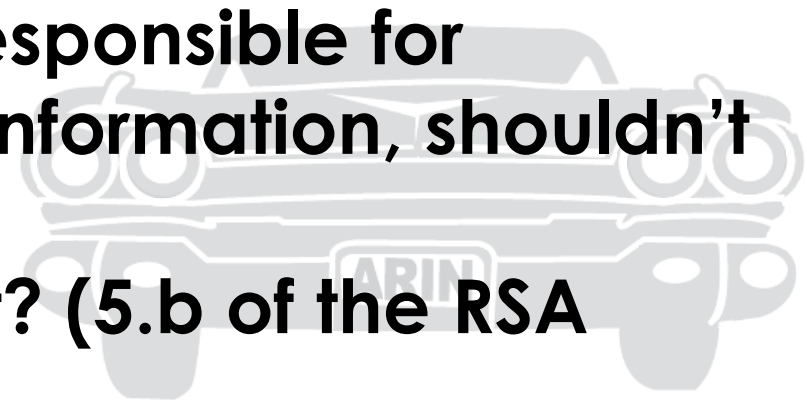


WHOIS Clean Up Project

- **ARIN did a trial run this year**
 - E-mailed all registered POCs with direct resources (IPv4, IPv6, ASNs)
 - Contacted 42,920 POCs with direct resources
 - ~4 months to complete (staggered mailings)
 - ~4% response rate overall
 - Still ~359,000 POCs with reassignments left to contact

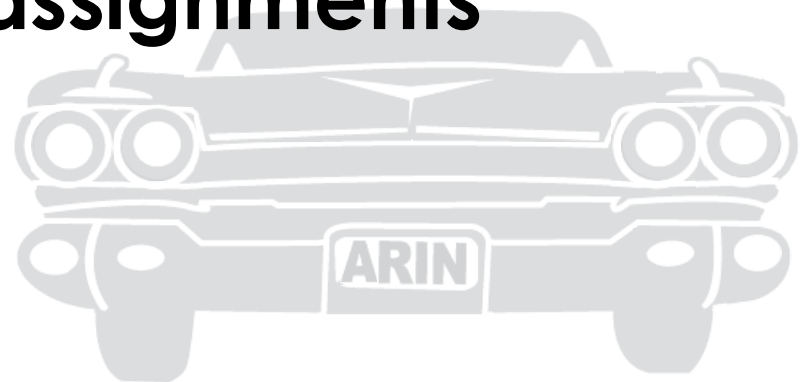


Issues & Questions

- Based on recent POC clean up effort, could take up to ~33 months to contact 359,000 POCs with reassignments
 - ARIN has no direct relationship/contract with downstream POCs
 - Since the upstream is responsible for entering reassignment information, shouldn't they be responsible for maintaining/updating it? (5.b of the RSA says yes)
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Recommendations

- **Send email only to POCs with direct allocations and assignments**
- **Make the upstream ISP responsible for updating and maintaining their downstream POC reassignments**

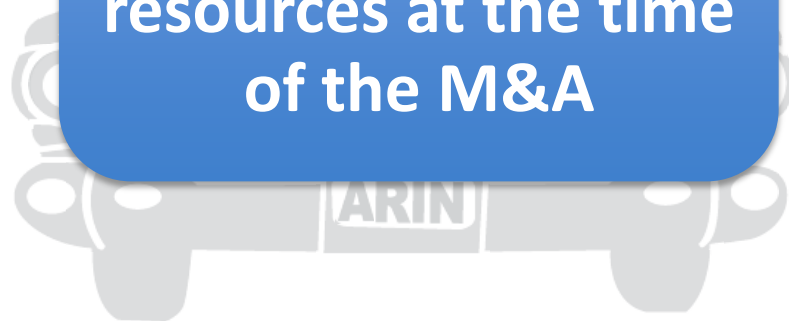


M&A Transfers (NRPM 8.2)

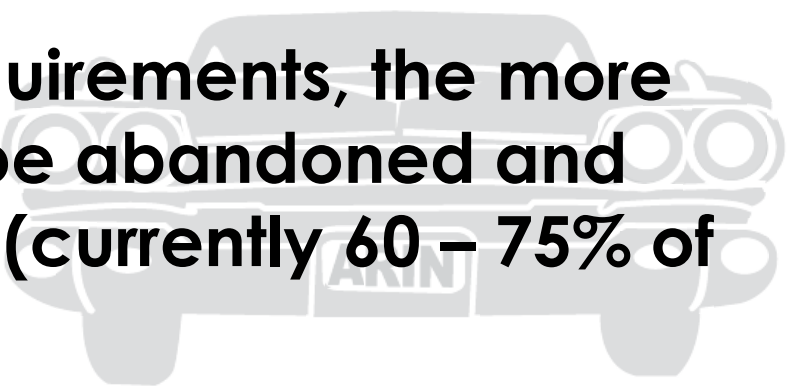
“ARIN will consider requests for the transfer of number resources in the case of mergers and acquisitions upon receipt of evidence that the new entity has acquired the assets which had, as of the date of the acquisition or proposed reorganization, justified the current entity's use of the number resource”



This says that the assets being transferred (e.g. customers or equipment) must have been using the resources at the time of the M&A



Issues & Questions

- Text could be made more clear
 - Transfer requests often come in years later, difficult to know how resources were being used at the time of the M&A
 - Should utilization at the time of the transfer request be considered?
 - If there is little or no utilization, should future use count?
 - The more stringent the requirements, the more likely the transfers are to be abandoned and the ARIN data inaccurate (currently 60 – 75% of transfers get abandoned)
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Current Practice

- Focus is on completing transfers and getting accurate data in WHOIS
- Typically, if transfers have proper documentation but resources are under-utilized, staff requests return of those resources but will approve request



Recommendations

- Liberalize the utilization requirements by allowing any of the following:
 - The resources being transferred must be in use at the time of the M&A **OR**
 - In use at the time the transfer request is submitted to ARIN **OR**
 - if not in use, the new entity must demonstrate how the resources will be utilized within 12 months.

