

ARIN



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Compliance Requirements

Let's focus on this proposal

- Section 12 is already policy.
- This proposal amends existing policy in section 12.
- Much of the discussion around this proposal criticizes existing policy and not the proposal.
- It would help the AC if we can confine discussion to the merits of this proposal and not the existing policy.



What does this proposal do?

- Amends section 12. Specifically:
 - Addresses some legal concerns with wording in 12.4
 - Adds reassignment updates as a compliance mechanism in 12.4
 - Provides specific timetables and uses DNS as an additional tool to try and get attention from a non-responsive organization in 12.5 and 12.6.

Staff Comments

- “Out of compliance not well defined”
 - I believe the current staff interpretation is the desired and expected result.
 - The existing policy reads “materially out of compliance” which is even less defined.
 - This proposal is slightly better than existing policy though not perfect in this regard.

Staff Comments

- “Removing an organization’s reverse DNS and/or reclaiming their IP number resources will be likely to have a negative impact on their ability to conduct business.”
 - This is equally true of existing policy
 - What is new in this draft policy is the ability to use DNS as an incremental step before full reclamation/revocation.
 - If the use in question is outside of ARIN policy, that impact is warranted.

ARIN General Council

- Concerns about litigation from policy enforcement
 - Could be true under existing policy
 - Community needs to decide whether we want ARIN to enforce its policies or not.
 - If not, how do we keep policy meaningful?



Pros

- Reduces (doesn't eliminate) some ambiguity from current section 12.
- Uses DNS as a gentler step prior to full on resource reclamation or revocation.
- Makes it easy for ARIN to give cooperating organizations additional time to comply
- Provides an incremental improvement to section 12. Additional improvements can come from additional proposals.



Cons (From PPML)

- ARIN should only enforce policies on new resource requests
- “Stop futzing with section 12”
- Don’t shut off DNS as leverage.
- ARIN should focus its resources elsewhere
- Skip the DNS shutoff and go straight to revocation

Questions for the community

- Reverse DNS shut-off in this policy is only used as a final attempt to gain compliance before moving on to revocation. Would the community prefer we go straight to revocation?



Questions for the community

- Focusing only on the aspects of section 12 that this draft policy seeks to change, are those changes an improvement to the existing policy?

Questions for the community

- Are there specific changes that would make you support this draft policy (if you don't already)?