



2010-11

Required Resource Reviews

Problem Statement

- ❑ Since the inception of section 12 of the NRPM, it has seen minimal use.
- ❑ Authors are aware of several recent events which seem to warrant section 12 reviews, but, which do not appear to have had them happen.
- ❑ Staff has suggested in the past that guidance on when to use section 12 would be useful.

What does this policy do?

- Sets forth certain limited criteria under which ARIN staff must conduct a resource review of an organization under section 12.

What are the triggers?

- ❑ **Suspicious Transfers**
 - ❑ **An organization which sells or transfers a significant customer base and/or infrastructure to another, but, retains the address resources must be reviewed.**

What are the triggers?

- Credible Report of Fraud or Abuse**
 - Abuse is construed narrowly as only violations of ARIN policies or RSA.
 - Specifically does not cover host abuses such as spam, malware, etc.

What are the triggers?

- Section 8.3 Transfer Recipients
 - 12.2(c) Exemption if already reviewed
 - Likely this clause just documents existing practice, although it may expand the scope of the review that is routinely conducted.

What are the triggers?

- ❑ **Over-use of Residential Customer Privacy**
- ❑ **Request for new resources from an organization which hides more than 25% of its resources under this provision.**
- ❑ **Does not discriminate against typical residential providers.**
- ❑ **Applies to IPv4 only.**

Residential Providers

- ❑ Residential customer privacy only applies to /29 and larger blocks issued to residential customers.
- ❑ Research failed to identify a single residential ISP that would be affected. Even ISPs that will issue more than a /32 to residential customers still issue /32s to most customers.

Why 25%?

- ❑ Smaller thresholds run the risk of accidentally discriminating against legitimate residential ISPs. That is not the intent.
- ❑ Obscuring this much address space in unusually large residential assignments is at least suspicious and worthy of a review prior to issuing more space to the org.

Why 12.10(e)?

- ❑ Other than 12.10(c), each of these criteria represents a specific suspicious use case which may be asynchronous to other events.
- ❑ Having a clean review should not give these behaviors a 2-year free ride.

Typo in the rationale

- ❑ The rationale mentioned comments about 12.10(e). This actually refers to comments about 12.10(d).

Closing Thoughts

- ❑ Most of the behaviors addressed by this policy has been observed in recent history.
- ❑ In one case, a provider sold several states worth of customers and possibly infrastructure to another while keeping the addresses.
- ❑ As addresses become scarce, this will only get worse unless.

Questions/Comments

