

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
Secure Internet Routing ) PS Docket No. 22-90  
)  
)

**Response of  
The American Registry for Internet Numbers, Ltd.**

**January 20, 2023**

The American Registry for Internet Numbers, Ltd. (ARIN) respectfully submits an update to the Federal Communications Commission (the "Commission") Request for Comments published in the Federal Register, Vol. 87, No. 48 of 11 March 2022.

Introduction

ARIN wishes to provide an update to The Commission as it notes that several other organizations and individual responses to the Request for Comment touch on matters pertinent to ARIN's mission, role as a critical Internet infrastructure operator, and services within the secure Internet routing area. This ARIN update shares relevant changes to both its Registration Services Agreement (RSA) and management of the Trust Anchor Locator (TAL) intended to encourage the deployment of ARIN's Resource Public Key Infrastructure (RPKI). These changes have been implemented since ARIN's last reply, posted 10 May 2022, to the FCC's Request for Comment (see footnote for ARIN's initial<sup>1</sup> and second<sup>2</sup> response to the FCC inquiry).

ARIN notes the following:

- 1) The RSA has been updated in one section that has been the subject of notable community feedback over the years. The updated RSA removes significant representations from Section 7 and renames the section (previously titled "No Property Rights") to "Acknowledged Rights To Included Number Resources." A redline showing the change may be seen here, [https://www.arin.net/about/corporate/agreements/rsav13\\_changes.pdf](https://www.arin.net/about/corporate/agreements/rsav13_changes.pdf). ARIN has not changed the RSA in more than five years; however, it was felt that this small change may be helpful to customers considering ARIN's services, including RPKI and its recently introduced Authenticated Internet Routing Registry ("IRR"). For clarity, this change to the RSA does not impact, nor does it alter, ARIN's position that Internet Number Resources are not freely-held

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<sup>1</sup>In the Matter of Secure Routing P.S. Docket No. 22-90, FCC 22-18; FRS 75229 The Response of the American Registry for Internet Numbers, Ltd.", posted April 11, 2022, <https://www.fcc.gov/ecfs/document/1040889310597/1>

<sup>2</sup> In the Matter of Secure Routing P.S. Docket No. 22-90, FCC 22-18; FRS 75229 The Response of the American Registry for Internet Numbers, Ltd.", posted May 10, 2022, <https://www.fcc.gov/ecfs/document/10510016967964/1>

property. Internet Number Resources constitute a bundle of contractual rights that are created upon issuance of an Internet Number Resource from the registry to a registrant. The original “No Property Rights” section was created at a time when this clear statement was necessary. Since then, the RSA has undergone multiple updates, including the addition of the specified rights granted to a Holder as detailed in Section 2 of the RSA titled “Conditions of Service and a revised Section 7 titled “Acknowledged Rights to Included Number Resources”

- 2) ARIN has changed the way it manages its Trust Anchor Locator (“TAL”), and specifically changes to our Relying Party Agreement (“RPA”) that support this change. The RPA has been updated once more to clarify that public distribution of the ARIN TAL, including by embedding the ARIN TAL in Relying Party software, is specifically allowed.

The updated RPA is available for review,  
<https://www.arin.net/resources/manage/rpki/rpa.pdf>

A redlined version of the RPA is also available,  
[https://www.arin.net/announcements/2022/documents/rpa\\_092922\\_redline.pdf](https://www.arin.net/announcements/2022/documents/rpa_092922_redline.pdf)

ARIN reiterates that with regard to any rulemaking by the Commission on utilization of RPKI for securing Internet routing, ARIN notes that it has not brought the question of regulatory involvement in this area to its community, and therefore it would not be appropriate for ARIN to represent a particular position. ARIN respectfully recommends that the Commission duly weigh any input received from those organizations that would be most directly affected by any such rulemaking, that is, Internet Service Providers and Network Operators.

Aside from rulemaking, the Commission may wish to consider the Internet security requirements included in the variety of Internet services that the FCC specifies or purchases to the extent that the security of their Internet routing is a concern. In other words, it would be a matter of business for the FCC and other government agencies as customers to request secure routing for themselves and for the services that the public relies on, including for example Public Safety Answering Points (PSAPs), and programs that seek to provide broadband to unserved and underserved areas.

ARIN continues to closely monitor the deployment of RPKI. In 2022 ARIN funded RPKI related research through its Community Grant Program<sup>3</sup>. The goal of this research project is to promote routing security in the ARIN region by showcasing data on route hijacks and RPKI adoption and encouraging greater academic and industry scrutiny over routing security practices. The outcome of this research will be a publicly available report.

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<sup>3</sup> ARIN Community Grant Program, [https://www.arin.net/about/community\\_grants/](https://www.arin.net/about/community_grants/), January 17, 2023

ARIN is grateful for the opportunity to provide an update on this discussion around secure Internet routing. The ongoing work in this area is of utmost importance and is essential in maintaining a robust, stable, reliable, and secure Internet for all users of the Internet both domestically in the United States and worldwide. We appreciate the Commission's efforts in this regard and remain available to respond to any further questions or comments the Commission may have.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Curran". The signature is fluid and cursive, written over a light grey rectangular background.

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