Problem Statement

Current Text (9 February 2024)

ARIN's mission includes maintaining and distributing registration information about who holds Internet number resources (Internet Protocol (IP) addresses and Autonomous System Numbers (ASNs)) in a public database referred to as Whois. Whois provides network operators, technical troubleshooters, law enforcement, researchers, and other interested parties with information about which organization administers specific Internet number resources. Distributing this non-personal information is very much in the public interest of proper functioning of the Internet.

While ARIN continues to recognize the ongoing relevancy and importance for publicly available WHOIS information in its control, ARIN must also take stock of evolving regional developments pertaining to data privacy and the cross-border sharing of personally identifying information (PII) which have led to or could lead to redactions among similar WHOIS resources outside of ARIN's purview.

Draft Policy ARIN-2024-2: WHOIS Data Requirements Policy for Non-Personal Information

Problem Statement
(continued)

In light of such developments, it is important for ARIN to codify its WHOIS data requirements and disclosure practices in a manner that is both a) respectful of privacy rights pertaining to PII and b) cognizant of the value non-PII data plays in the security of the Internet and the protection of the general public.

Currently there are no ARIN policies that clearly define what organization and associated point of contact information must be provided and registered in the public Whois. This proposal attempts only to clarify and codify ARIN's existing practice regarding organization and contact data collection and display in Whois.

Policy Statement

3.8 Directory Service Records

Modify 3.8.1 to include the following sentence:

All organization registration records will be visible in the public Whois.

Add 3.8.2

3.8.2 Required Organization Record Information

The following information must be provided to ARIN to register an organization record:

Org Name

Org Street Address, City, State and Zip code (or equivalent)

Org Country

Policy Statement

Add 3.8.3 Point of Contact Record Creation

An organization may register designated Points of Contact to manage its organization and resource registration records to include Administrative, Technical, NOC and Abuse contacts. These Points of Contact shall be representatives of the organization and any information provided to ARIN shall be that contact's associated organizational information and not personal data.

Point of Contact registration records will generally be visible in the public Whois. Refer to NRPM 3.3 and NRPM 4.2.3.7.3.2 for exceptions to this general rule.

Policy Statement

Add 3.8.4 Required Point of Contact Record Information.

The following information must be provided to ARIN to register an organization or resource Point of Contact:

- Contact Name (this can be an individual representative of the company or a role account)

- Contact's Organization Street Address, City, State and Zip code (or equivalent)

- Contact's Organization Phone Number

- Contact's Organization E-Mail Address

- Contact's Organization Country

History

Action	Date
Proposal	9 February 2024
Draft Policy	21 March 2024

Draft Policy ARIN-2024-2: WHOIS Data Requirements Policy for Non-Personal Information

Policy Impact

- 3.8.2 defines what registration data is required for an Organization record. The Number Resource Policy Manual doesn't define ARIN operational policy

- 3.8.3 contains a potential conflict in privacy policy regarding which data is allowed to remain private versus existing 3.2 & 3.3

- Overall, there may be potential exposure of personally identifiable information data. Currently, that data is either not published or is redacted as "private"

Community Feedback

One statement of support on PPML

QUESTION(S) FOR THE COMMUNITY

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Do you believe this policy to be in scope for the Number Resource Policy Manual?

If so, are you in support of this policy?