



NEW ORLEANS | 2-5 APRIL 2017

**Draft Policy 2017-3 UPDATE TO NPRM 3.6:**  
Annual Whois POC Validation

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# Problem Statement

## WHOIS Inaccuracy Challenges for Public Safety & Law Enforcement

From a public safety perspective, the failure to have accurate ARIN public access WHOIS information can present the following challenges:

- Ability of public safety and law enforcement agencies to rapidly identify IP number resources used in on-going abusive activities;
- Wasted network operator resources spent on responding to potentially misdirected legal requests; and
- Domain name and IP number resources hijacking, resulting in the potential use of those domain names and IP number resources for criminal activity.

# Problem Statement

## Legacy Resources and M&A Updates

- The problem of potentially inaccurate information is most acute with Legacy resources.
- Legacy registrations are held by thousands of entities that do not have updated and verified points of contact.
  - Many of the original points of contact were removed, and replaced with placeholder records that do not provide any value.
- Current ARIN practices do not allow organizations that have been merged or acquired to update their point of contact records without having to enter into a contractual relationship with ARIN.
- This causes many organizations to not go through the process of updating even their point of contact records.

# Problem Statement

- As the amount of criminal activity enabled by the Internet continues to grow, users whose IP number resources are abused need to be able to obtain redress.
- For organizations tasked with protecting the general public, one of the most important registration records in the ARIN's WHOIS directory is the last ISP in the chain of network operators providing connectivity.
- To facilitate timely/effective response to abusive and criminal activity, the ARIN public access WHOIS directory must be up-to-date and map IP number resources to the correct network provider.
- Privacy, safety and security are all equally important outcomes, and depend, to a large extent, on the accuracy of the ARIN public access WHOIS directory.

# Policy Statement

## Current Text

### 3.6 Annual Whois POC Validation

- **3.6.1 Method of Annual Verification**

During ARIN's annual Whois POC validation, an email will be sent to every POC in the Whois database. Each POC will have a maximum of 60 days to respond with an affirmative that their Whois contact information is correct and complete. Unresponsive POC email addresses shall be marked as such in the database. If ARIN staff deems a POC to be completely and permanently abandoned or otherwise illegitimate, the POC record shall be marked invalid. ARIN will maintain, and make readily available to the community, a current list of number resources with no valid POC; this data will be subject to the current bulk Whois policy.

# Policy Statement

## Proposed Revised Text Summary

- ARIN will perform an annual POC verification by sending out email notifications to the Admin, Tech, NOC, and Abuse POCs of every organization that holds a
  - Direct Assignment
  - Direct Allocation
  - Reallocation
  - AS Number
- Does not apply to Reassignments made to downstream customers or end users
- Legacy resource holders will be able to update their POCs without entering into a contractual relationship with ARIN

# Policy Statement

## Proposed Revised Text Summary

- Each POC will have 60 days from the date of notification to respond
- After the initial 60 day period
  - Non-responsive POCs will be marked as “non-responsive” in the public WHOIS directory
- After an additional 90 days (150 days from the date of notification)
  - ARIN staff will conduct thorough research and analysis before marking those non-validated, abandoned, or otherwise illegitimate POC records “invalid”
- Records marked “invalid” will be taken out of reverse DNS and their associated resources will be removed from the public WHOIS thereby disabling reverse DNS

# Discussion

- Is taking resources out of reverse DNS and removing them from the public WHOIS an appropriate incentive to update POC records given the severity of the problems posed by WHOIS inaccuracy?
- If not, how can we effectively incentivize POC updates?
- Does the community support allowing Legacy resource holders to update their POC records without entering into a contract with ARIN?