

Recommended Draft Policy ARIN-2022-3: Remove Officer Attestation Requirement for 8.5.5

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History



Action	Date
Proposal	6 June 2022
Draft Policy	21 June 2022
Recommended	26 October 2022

History - Continued



- In August 2021, ARIN initiated Consultation 2021.04 on **Retiring the Officer Attestation Requirement**

"...the Officer Attestation process is no longer necessary for achievement of its original goals and should be retired."

"In light of the administrative burden to customers and undefined benefit, ARIN proposes dropping the Officer Attestation requirement."

Problem Statement



- Requiring an officer attestation requires unnecessary resources and increases the time to complete an IPv4 transfer.

Policy Statement (current text)



- **8.5.5. Block Size**

- Organizations may qualify for the transfer of a larger initial block, or an additional block, by providing documentation to ARIN which details the use of at least 50% of the requested IPv4 block size within 24 months. An officer of the organization shall attest to the documentation provided to ARIN.

Policy Statement (proposed text)



- **8.5.5. Block Size**

- Organizations may qualify for the transfer of a larger initial block, or an additional block, by providing documentation to ARIN which details the use of at least 50% of the requested IPv4 block size within 24 months. ~~An officer of the organization shall attest to the documentation provided to ARIN.~~

Policy Statement (proposed text)



- **8.5.5. Block Size**

- Organizations may qualify for the transfer of a larger initial block, or an additional block, by providing documentation to ARIN which details the use of at least 50% of the requested IPv4 block size within 24 months.
- Removing "An officer of the organization shall attest to the documentation provided to ARIN."

Policy Information



- **Timetable for implementation:** Immediate
- **Comments:**
 - This is the only remaining mention outside Section 9 (which makes good use of the restrictions it has).
 - Due to the cost of IPv4 at this time, it is safe to say that someone of authority is aware of this transaction without having them provide an attestation.

Community Feedback - PPML



- Several individuals voiced their concern on the Public Policy Mailing List (PPML) that removal of officer attestation might reduce legal ramification for fraudulent actors
 - Staff and Legal Review has addressed this concern
 - No loss in ability to pursue cases of fraud
- Some concern that organizational awareness will be lost
 - This concern falls outside of the scope of the Policy Development Process (PDP) and Number Resource Policy Manual (NRPM) principles
 - ARIN performs a good deal of community outreach, maybe this fits

Other Community Feedback



- Several comments on PPML in support of the removal of officer attestation from 8.5.5, noting low value and high cost of this requirement
- Some direct conversations with representatives of affected organizations voiced their support, because of the difficulty inherent to seeking officer attestation within large organizations

Staff and Legal Review (15 August 2022)



- **Staff Understanding**

- ARIN-2022-3 would remove the officer attestation requirement for organizations qualifying for initial transfers larger than a /24 (ARIN's present minimum IPv4 transfer size) or additional transfers. For reference, this requirement became part of the NRPM Section 8 in February 2017 allocation policy. The requirement was removed from operational practice for IP address and ASN allocation requests via [Consultation 2021.04 Retiring the Officer Attestation Requirement](#).
- The policy text is clear and understandable.

Staff and Legal Review (15 August 2022)



- **Implementable as Written?**
 - Yes
- **Impact on ARIN Registry Operations and Services:**
 - Minor updates within ARIN Online will need to be made to remove attestation language.
- **Legal Review:**
 - No material legal issue. Removal of the officer attestation would not materially impact ARIN's ability to pursue cases of fraud.

Staff and Legal Review (15 August 2022)



- **Implementation Timeframe Estimate:** Six months
- **Implementation Requirements:**
 - Updates to ARIN Online
 - Staff training
 - Updates to public documentation
 - Updates to internal procedures and guidelines

Questions?
Comments?



QUESTION FOR THE COMMUNITY

**Does the community support
the policy as currently written?**

Thank You

