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## MAAWG Comments on the Proposed ARIN Draft Policy 2010-3

MAAWG supports ARIN's commitment to accurate, usable WHOIS information for IP addresses. The investigation and prosecution of criminal activity and abuse on the Internet has been greatly facilitated by the availability of accurate WHOIS data. In addition, the proliferation of spam and the transmission of malware of all types which is the fundamental focus of the work undertaken by MAAWG and its members are the most common and serious types of privacy intrusions, occurring billions of times a day, world-wide.

For anti-abuse researchers, investigators and systems operators, WHOIS is an essential and basic tool. People who manage abuse of their networks need to easily, readily and accurately identify all entities on a given network.

Hiding the true owner of a resource will increase the mistrust users have of the Internet. MAAWG believes that this proposed policy change appears to be inconsistent with the policies of other regional registries. If ARIN's rules are less strict than other registries', ARIN invites an influx of abusive customers and cybercriminals, potentially damaging the value of ARIN-allocated space for all of its users.

ARIN Draft Policy 2010-3 'Customer Confidentiality' states that "The customer's actual information must be provided to ARIN on request and will be held in the strictest confidence." It is not clear whether ARIN or the ISP would have the contact information. It is also not clear that the ISP would routinely provide the true contact information when SWIPing a block, or only on exceptional request. The draft policy offers no enforcement mechanism to ensure that ISPs have the information available or that ISPs will respond to such requests promptly. Here again, this policy raises serious implications for abuse researchers and other entities that need this data.

MAAWG sees no benefit to the public of removing this key information from WHOIS. We also are skeptical that this change would accomplish its stated purpose. It does not require great skill to identify the user of an IP block, by visiting web servers in the range and other means. It is rarely difficult to find the phone number of a business, given its name.

We firmly oppose adoption of ARIN Draft Policy 2010-3. We request that ARIN continue to ensure that all contact information published in the WHOIS database is up to date and correct for any resource holder to continue to use as a basic tool.

Regards,  
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