



**RIPE NCC**

RIPE NETWORK COORDINATION CENTRE

# Updates to the Registry in Areas in Distress

Athina Fragkouli | RIPE 85 | 26 October 2022

# The Concern



- Due to the circumstances in a region, requests for registry updates (e.g. transfer requests) have questionable legitimacy
  - Requests submitted under threat or false pretences
- Relevant to countries affected by political dispute, international conflicts or war
  - Not only Ukraine

# Our Commitments



- Provide support to local network operators
- Be neutral and transparent
- Comply with the RIPE policies

➔ Any mitigating measures must adhere to these commitments



# Current Measures

# Due Diligence Procedure



- Due diligence checks to ensure validity or request
  - Authority, registration documents, identity
- If doubts about a request
  - Stricter checks - e.g. validity of all documents

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# Areas in Distress

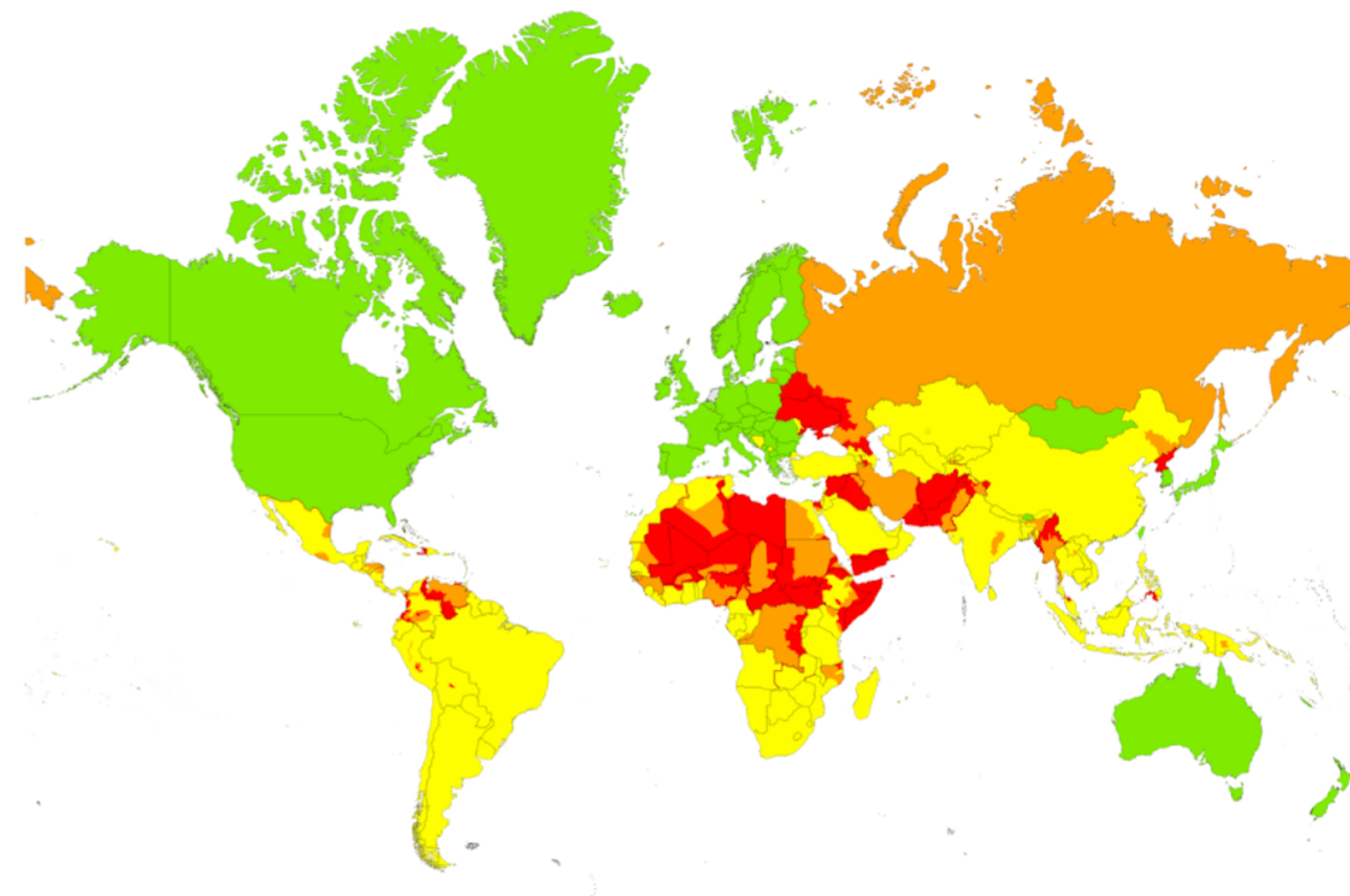


- Based on third party sources

# Areas in

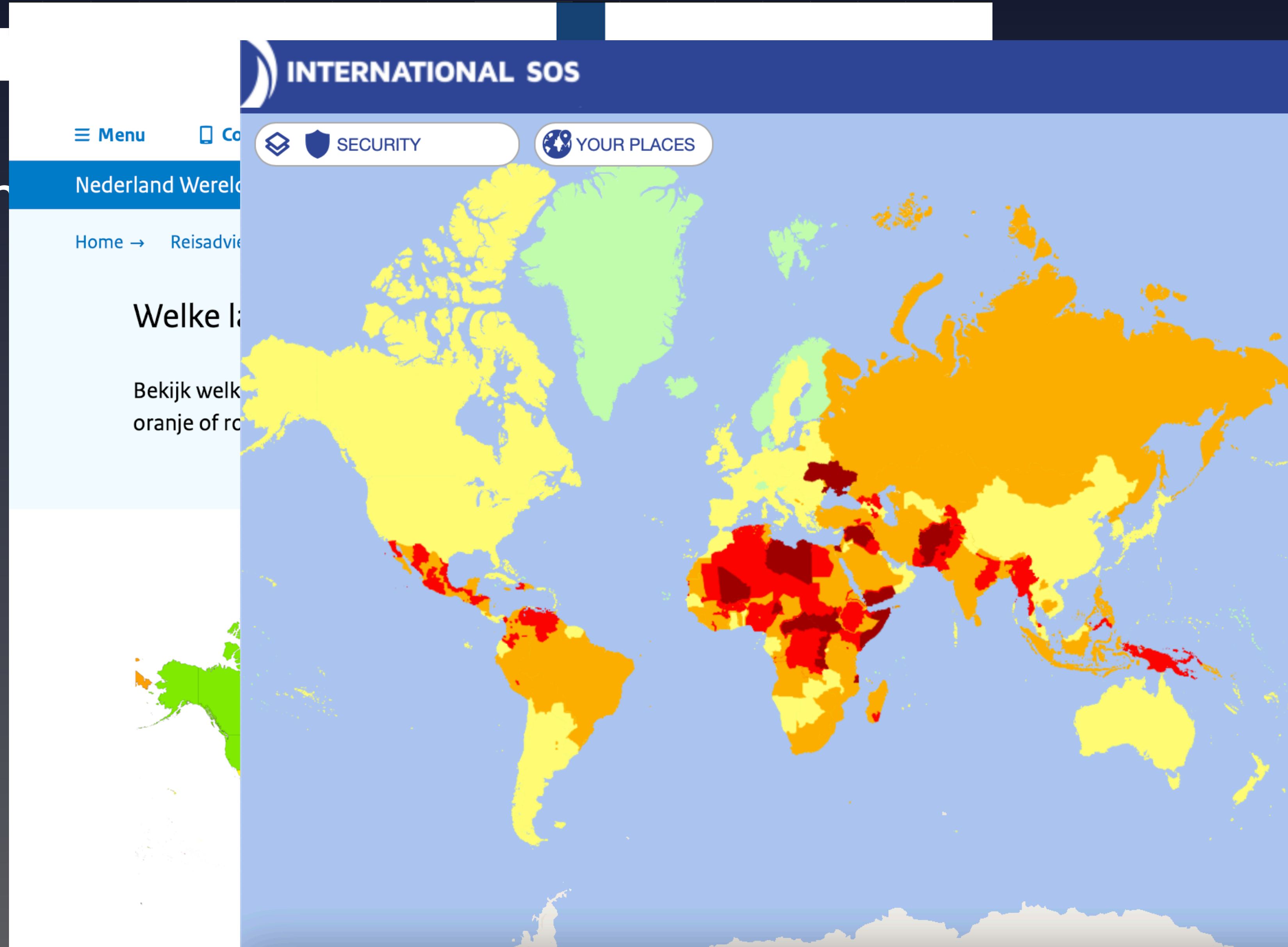
## Welke landen hebben welke kleurcode?

Bekijk welke landen en gebieden kleurcode groen, geel, oranje of rood hebben in het reisadvies.



# Areas in

- Based on the



# Areas i

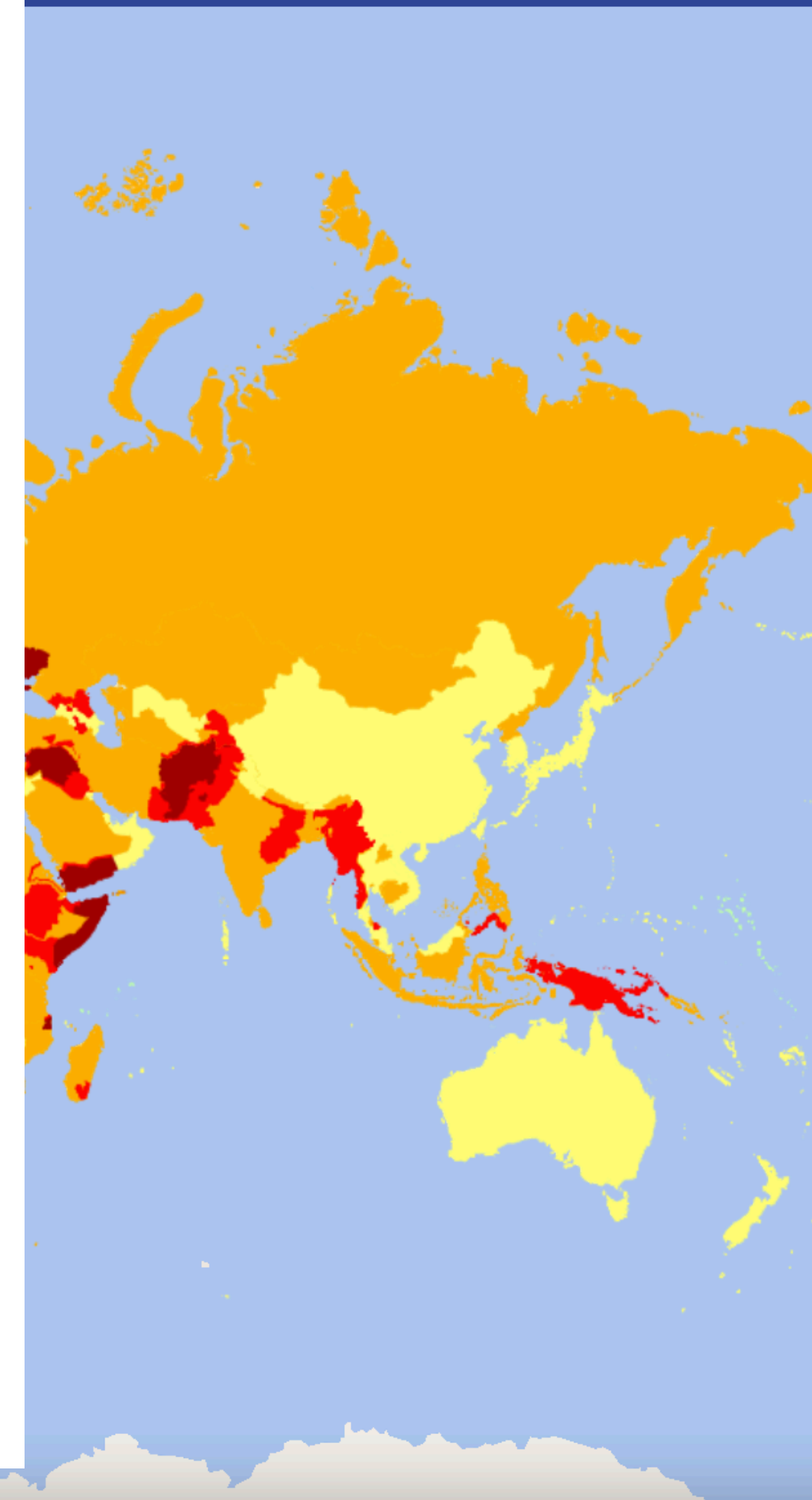


- Bas

## FY23 List of Fragile and Conflict-affected Situations



CONFLICT	INSTITUTIONAL AND SOCIAL FRAGILITY
Afghanistan	Burundi
Burkina Faso	Chad
Cameroon	Comoros
Central African Republic	Congo, Republic of
Congo, Democratic Republic of	Eritrea
Ethiopia	Guinea-Bissau
Iraq	Haiti
Mali	Kosovo
Mozambique	Lebanon
Myanmar	Libya
Niger	Marshall Islands
Nigeria	Micronesia, Federated States of
Somalia	Papua New Guinea
South Sudan	Solomon Islands
Syrian Arab Republic	Sudan
Ukraine	Timor-Leste
Yemen, Republic of	Tuvalu
	Venezuela, RB
	West Bank and Gaza (territory)
	Zimbabwe





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Iraq	Haiti
Mali	Kirgizstan
Mozambique	Libya
Myanmar	Libya
Niger	Marshall Islands
Nigeria	Micronesia, Federated States of
Somalia	Papua New Guinea
South Sudan	Solomon Islands
Syrian Arab Republic	Sudan
Ukraine	Timor-Leste
Yemen, Republic of	Tuvalu
	Venezuela, RB
	West Bank and Gaza (territory)
	Zimbabwe

Other sources?





# Possible Extra Measures



# 1. Extra Disclaimer

- Legal transactions under threat or deception can be nullified by court
- If a request looks good on paper —> accepted with an extra disclaimer:
  - If nullified by court, the update will be reverted
- The extra disclaimer will follow any further transfer of the resources
  - Receiving party will be informed and accept the consequences of a future nullification



# 2. Freeze all updates



- All update requests from areas in distress will be rejected
  - No risk of illegitimate updates
  - Legitimate updates will also be blocked
  - Impact on accuracy of the registry



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# 3. Freeze Button



- Registration information locked for a specific period of time (e.g. six months)
  - Sense of security for resource holders foreseeing a threatening situation
  - Vulnerable to abuse
  - Administrative challenges (who can push the button?)
  - If companies merged, liquidated etc, button will not prevail
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# 4. Review of Request by Local Governments



- Verification of requests by governments for the duration of a conflict
  - Minimise the risk of illegitimate transfers
  - Undermine the self-governance model
  - Requests evaluated with political criteria
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# **A Final Word**

Registration Documents from  
Areas under Dispute



# Areas under Dispute



- Area claimed by multiple states or area self-proclaimed as independent state
  - Different from “areas in distress”
- National registration papers from which country?
  - Part of our public RIPE NCC procedural document

The screenshot shows the RIPE NCC website interface. The main content area displays the document title "Due Diligence for the Quality of the RIPE NCC Registration Data" with a publication date of 24 Nov 2021. The document is categorized under "Publications" in the left sidebar. The main text includes an introduction stating the RIPE NCC's mandate to maintain accurate Internet number resource registry data. It also lists authors as RIPE NCC and the date as November 2021. A table of contents is provided, detailing sections on registration of Internet number resources, compliance with RIPE policies, distribution of resources, sanctions and areas under dispute, and confidentiality/privacy issues.

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## Due Diligence for the Quality of the RIPE NCC Registration Data

Publication date: 24 Nov 2021

### Introduction

The RIPE NCC has a mandate from the RIPE community to keep an up-to-date and correct Internet number resource registry. In order to comply with this mandate, the RIPE NCC performs due diligence on organisations the RIPE NCC registers Internet number resources for.

Due diligence refers to the controls the RIPE NCC performs:

- **Before** the registration of Internet number resources (see Section 1)
- **After** the registration of Internet number resources (see Section 2)

This document outlines the **minimum** information and documentation the RIPE NCC requires to make sure that the registration data is valid and up-to-date while complying with the applicable legislation as an association under Dutch law.

### Table of Contents

1. Before the Registration of Internet Number Resources
  - 1.1. Establishment of an agreement
    - 1.1.1. If the signing party is a natural person
    - 1.1.2. If the signing party is a legal person
      - 1.1.2.1. Proof of establishment/registration
      - 1.1.2.2. Approval by authorised representative
    - 1.1.3. Entities without legal personality
  - 1.2. Compliance with RIPE Policies
2. After the Registration of Distribution of Internet Number Resources
  - 2.1. Submission of a change
  - 2.2. Agreement for the transfer of Internet Number Resources
3. Sanctions and areas under dispute
  - 3.1. Sanctions
  - 3.2. Areas under dispute
4. The Provision of Falsified or Misleading Data
5. Confidentiality and Privacy issues

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# Areas under Dispute



The screenshot shows the RIPE NCC website interface. At the top, there is a search bar for IP addresses or ASNs. Below it, there are navigation links for 'Publications' and 'About Us'. The main content area displays a search result for 'ripe-770', showing its state as 'Published', authors as 'RIPE NCC', and date as 'November 2021'. There are download buttons for PDF (249.0KB) and ASCII formats.

Below the search results, there is a table of contents for a document. The document title is '2. After the Registration of Distribution of Internet Number Resources'. The table of contents lists the following sections:

- 2.1. Submission of a change
- 2.2. Agreement for the transfer of Internet Number Resources
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# Areas under Dispute



## 3.2. Areas under dispute

The RIPE NCC will strive to facilitate the provision of services to network operators in areas under dispute and does not wish to deny services for political reasons. The RIPE NCC's foremost concern as a neutral membership organisation is to ensure accurate registration of Internet number resources. The RIPE NCC can neither recognise nor deny one state's authority over a region.

The RIPE NCC relies on proof of establishment provided by the signing party. This proof of establishment must be issued by a national authority and prove that the signing party exists.

If the signing party is located in an area claimed by two or more widely recognised states, the RIPE NCC may accept proof of establishment issued by whichever national authority the signing party chooses.

If the legal person is located in an area that is self-proclaimed as an independent state, the RIPE NCC may accept proof of establishment issued by the relevant authorities accompanied by further documentation (e.g., proof of identity of the authorised representative, articles of incorporation etc.).

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# Questions



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