

Summary of comments on RSA draft dated 30 Sep 2017, and changes in draft dated 31 Oct 2017.					
Call for comments was published on 2 Oct 2017 at < <a href="https://afrinic.net/en/news/2211-call-for-comments-on-a-revision-to-the-rsa">https://afrinic.net/en/news/2211-call-for-comments-on-a-revision-to-the-rsa</a> >.					
Date	Commenter	URL (First message in thread)	Comment	Staff response	Changes made between draft dated 30 September 2017 and draft dated 31 October 2017
2 Oct 2017	Sander Steffann	<a href="https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001715.html">https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001715.html</a>	<p>Depending on how someone wants to read it, [the definition of "Services" in 1(c)(i)] might be interpreted in a way that sets a precedent that says that transfers are not included in "allocation/assignment" by default and need to be mentioned explicitly.</p> <p>I know, I'm picking nits here, but for consistency and to avoid misinterpretations I think it would be better to either not mention "or transfers" here, or to explicitly include them in other places as well.</p>	<p>A transfer is in fact more than an assignment or allocation; it also includes the source relinquishing the right to use the resources.</p> <p>The reference to transfers under "Services" is intended to include not only the step of allocating or assigning to the recipient, but also the additional step of recovering the resources from the source, and making appropriate adjustments to the registration database.</p> <p>This could be made clearer by expressing the idea that transfers include allocation or assignment in a definition under 1(c) instead of in an acknowledgement clause under 6(d).</p>	<p>* Add a definition in 1(c)(iv) as follows:</p> <p>"Transfer" of number resources from a source to a recipient includes the source relinquishing its right to use the number resources, and the simultaneous or subsequent allocation or assignment of the number resources to the recipient;</p> <p>* Remove 6(d)(vii) from the draft of 30 September 2017, which said that a transfer was a kind of allocation or assignment. This clause was not in the previous version of the RSA. The underlying idea is covered by the new definition in 1(c)(iv).</p> <p>* Re-number sub-claused in 19c) and 6(d).</p>
2 Oct 2017	Adewole Ajao	<a href="https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html">https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html</a>	<p>It appears (today) under the context of application and registration that transfers may be treated the same as allocations and assignments.</p> <p>However, if for some unforeseen reason, it is decided in future (under some unforeseen context) that a transfer is to be treated differently from allocations and assignments, the documentation may become inconsistent. I would favour an explicit mention of transfers everywhere *for now* (given that we do not yet know transfers as well as we know allocations and assignments).</p>	<p>We can change the RSA again in future if that becomes necessary.</p>	<p>No change</p>
2 Oct 2017	Adewole Ajao	<a href="https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html">https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html</a>	<p>Number/Numbering inconsistency persists in 6d (iii)</p>	<p>Agreed</p>	<p>Change "numbering resources" to "number resources" in 6(d)(iii)</p>

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2 Oct 2017	Adewole Ajao	<a href="https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html">https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html</a>	Consider prefixing "transfer of number resources..." in 6d (v) with the word "unauthorized" or something similar. I don't think we can say something is *strictly* prohibited and in the same breath say it can be done under certain conditions.	"... strictly prohibited ... unless ..." seems clear enough that there is a way of authorising transfers.	No change
2 Oct 2017	Adewole Ajao	<a href="https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html">https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001717.html</a>	Because a case may involve doing both (1) and (2) in 6d (viii), I believe (1) should read (just for the sake of reducing legal maneuvering space for an offender):  (1) remedy the breach, following directions from AFRINIC, *and/or.*	Agreed	Changed "or" to "and/or" in 6(d)(viii)
3 Oct 2017	Lu Heng	<a href="https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001718.html">https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001718.html</a>	I believe there are still massive amount of IP address management item inside the RSA.  [several examples, not listed here, and several followup-messages in the thread]	Such large changes are out of scope for the current revision to the RSA. They may be considered in a subsequent revision to the RSA.	No change
30 Oct 2017	Noah	<a href="https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001751.html">https://lists.afrinic.net/pipermail/communitiy-discuss/2017-October/001751.html</a>	It is very important to see that the proposed changes through the updated 6d(v) and the new 6d(vi) address the concerns expressed. *The main/major concern was make sure that we do not create any loopholes to be exploited after.*	Agreed. What was proposed to be the new 6(d)(vii) is now a new definition of "Transfer" in 1(c)(iv). Together, the reference to "transfer ... in compliance with adopted policies", and the clarification that a transfer is relinquishment by the source followed by allocation/assignment to the recipient, should address this concern.	No change to 6(d)(v). What was proposed to be the new 6(d)(vii) is now part of a new definition of "Transfer" in 1(c)(iv).