



RIPE NCC
RIPE NETWORK COORDINATION CENTER

RIPE NCC Open House: Internet in Iran

Welcome to our Open House



RIPE NCC Open House
Join us online!

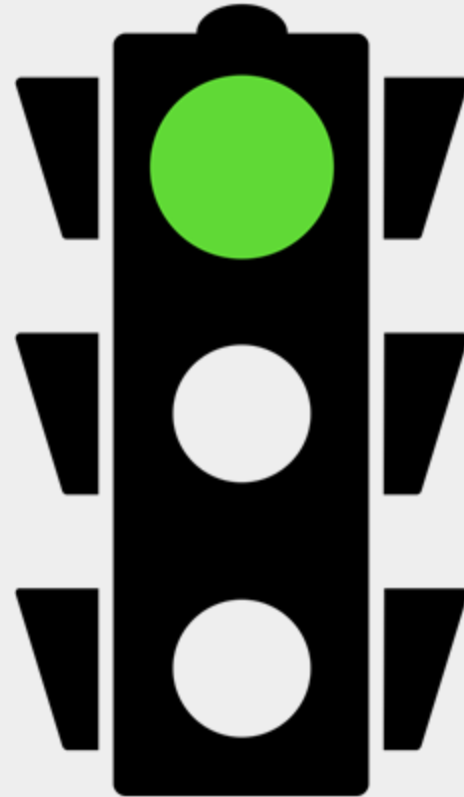


**Please keep
your
microphone
on mute!**





**There will be
an open Q&A
at the end of
the session**





RIPE NCC Open House: Internet in Iran

- Housekeeping and Introductions
- Alastair Strachan - Country Statistics
- Simon-Jan Haytink - CFO - Billing questions
- Athina Fragkouli - CLO - RIPE NCC and Sanctions
- Alastair Strachan - More than just a registry...
- Open Discussion

Hello!



Alastair Strachan

Community Development Officer



astracha@ripe.net

Iran - Country Statistics



- LIR Accounts
- IPv4/IPv6 Holdings
- Transfers
- International Transit
- K-Root
- RIPE Atlas





LIR Accounts

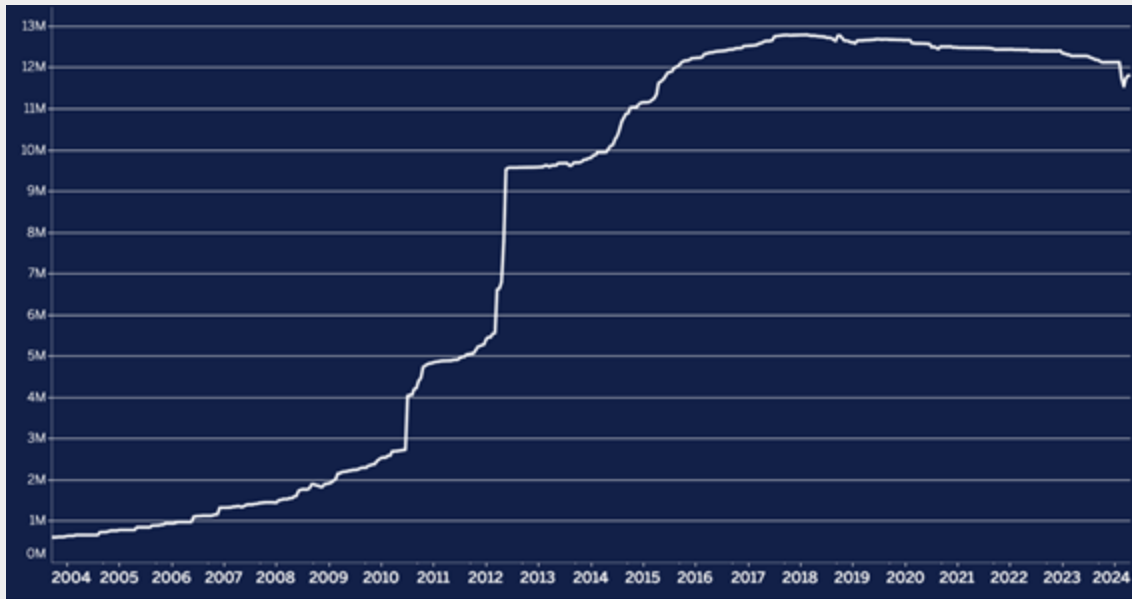
- 686 LIR accounts
- Steady growth
- Dips due to merging LIR accounts





IPv4

- Nearly 12 million IPv4 addresses
- Sharp increase around 2012
- Decrease early 2024 due to transfer

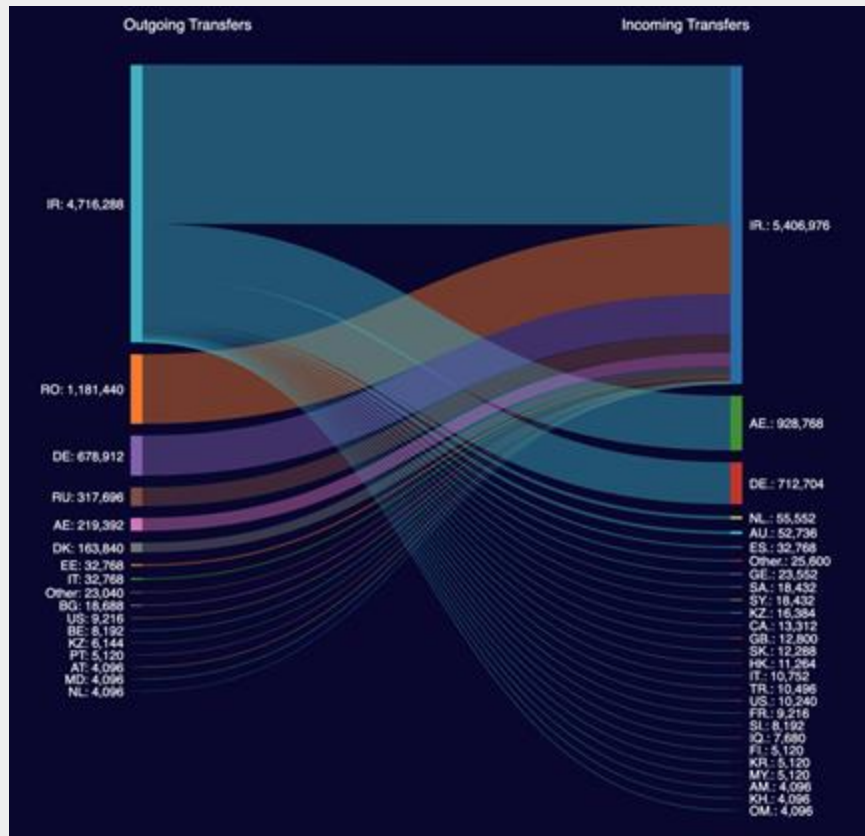


Iran - Country Statistics



IPv4 Transfers

- IR – IR = 2.69M Addresses
- IR - AE = 928K Addresses
- IR - DE = 712K Addresses
- RO - IR = 1.18M Addresses
- DE - IR = 678K Addresses

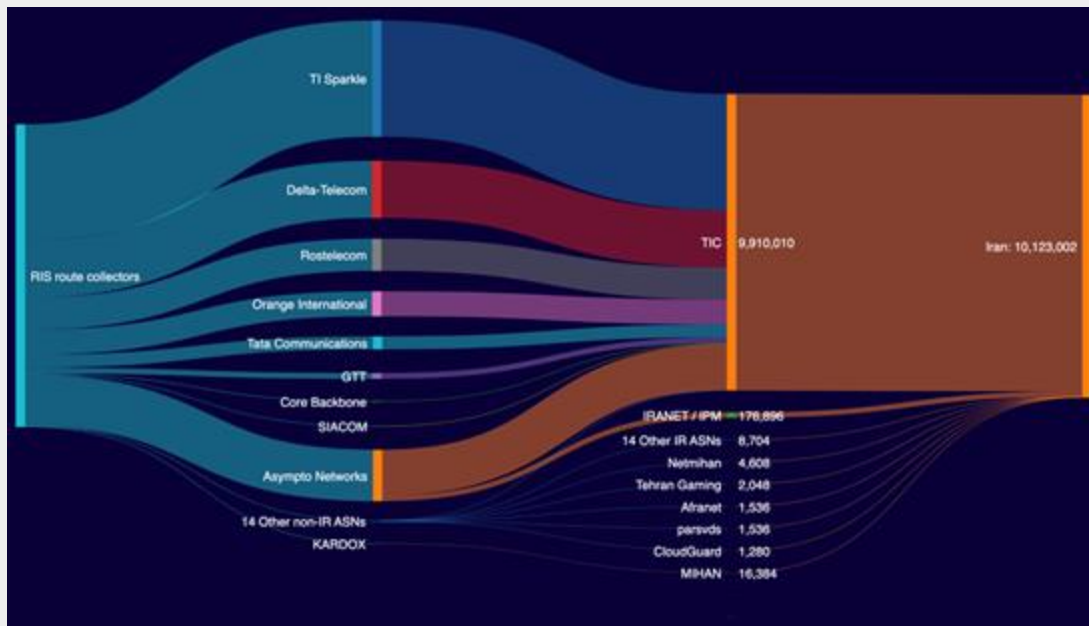


Iran - Country Statistics



IPv4 international connectivity

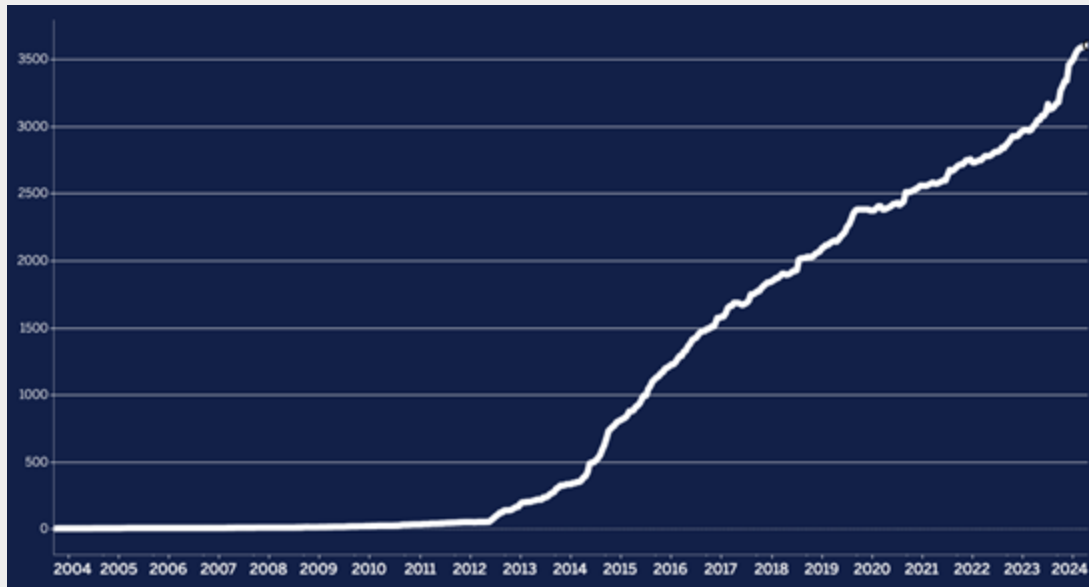
- TIC connects to multiple carriers
- TI Sparkle, Delta Telecom being the largest





IPv6

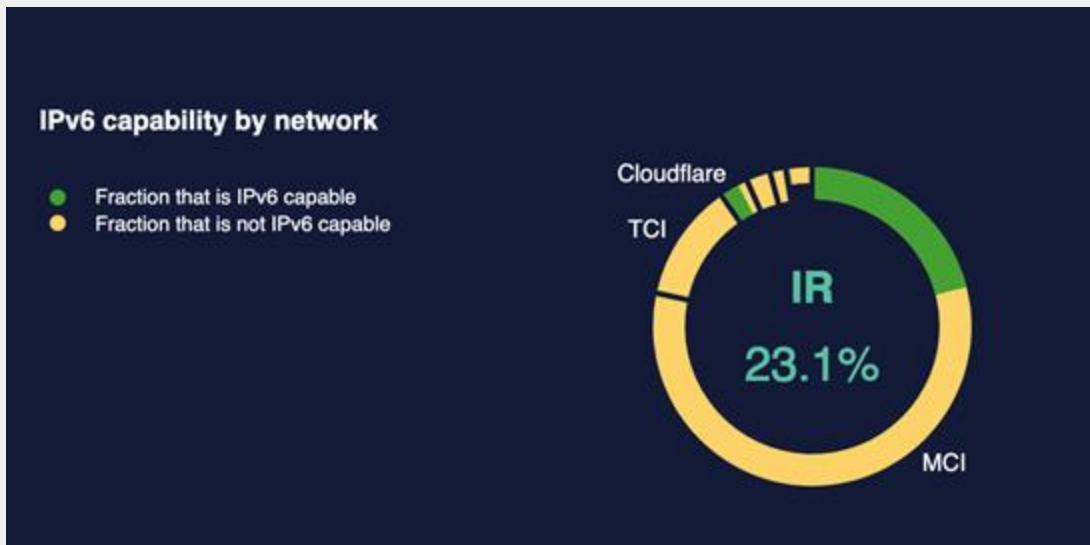
- 3604 /32 IPv6 Allocations
- Steady growth
- Does not mean announced/in use





IPv6 Capability

- 23.1%
- Lower than global average of 35-45%



Iran - Country Statistics



RIPE Atlas

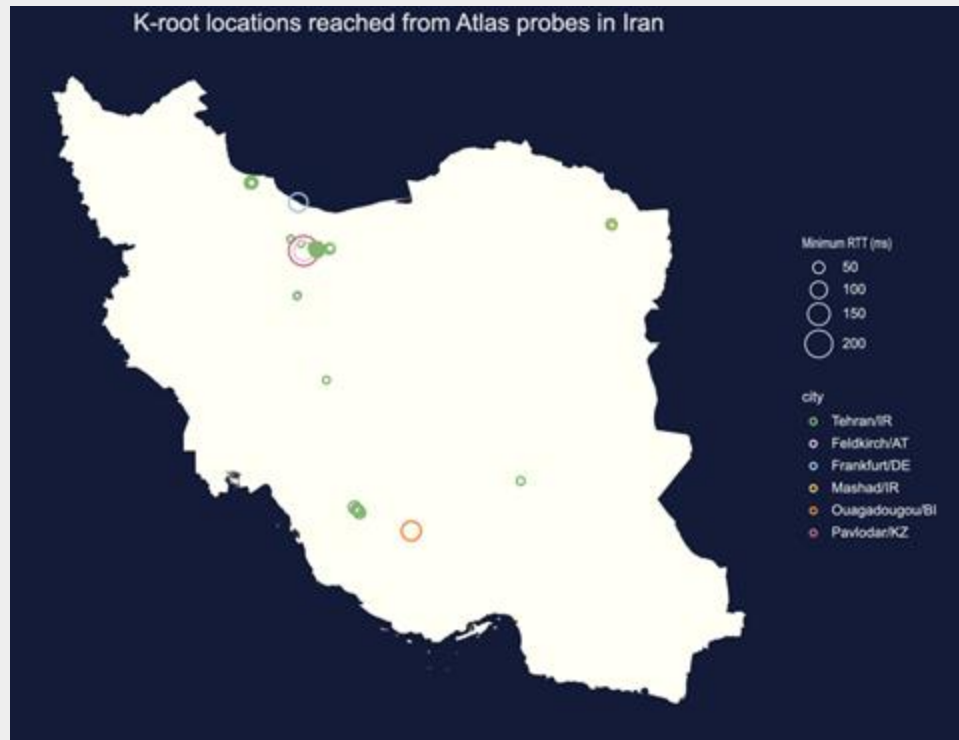
- 87 Probes connected
- 2 Atlas Anchors





K- Root

- Most probes reach K-Root instance in Tehran
- 50ms Round trip time (RTT)
- Instance in Mashad with similar RTT
- Probes reaching DE and AT most likely due to specific measurements

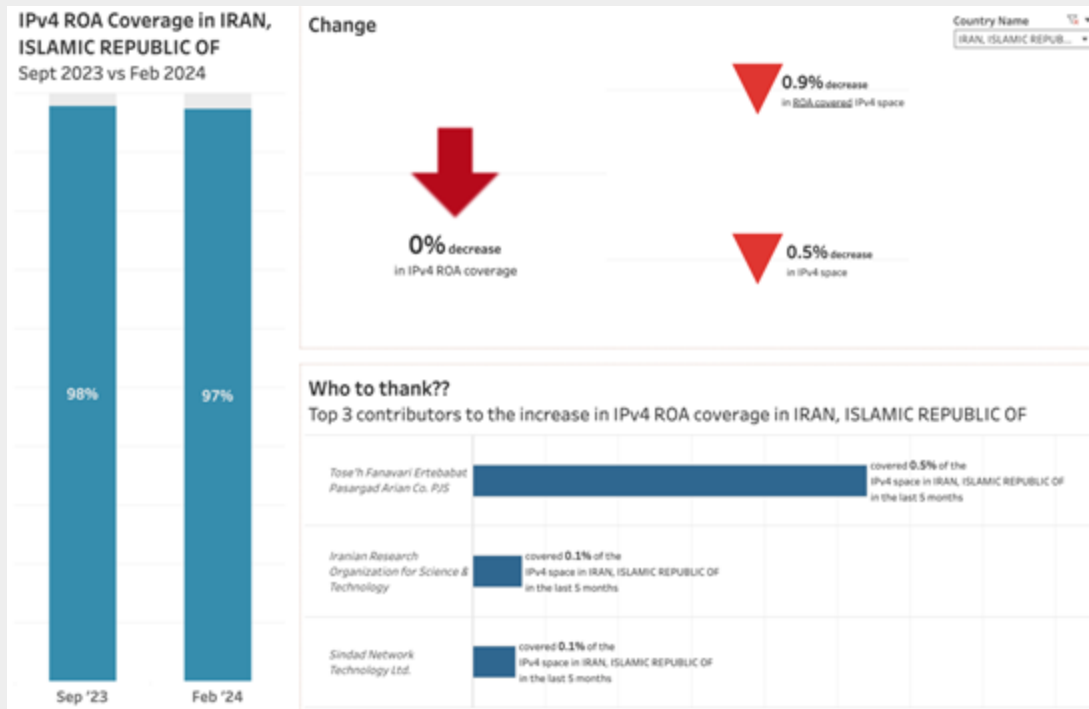


Iran - Country Statistics



RPKI - IPv4

- 97% IPv4 covered by ROA
- Unsure what may have caused 1% drop?

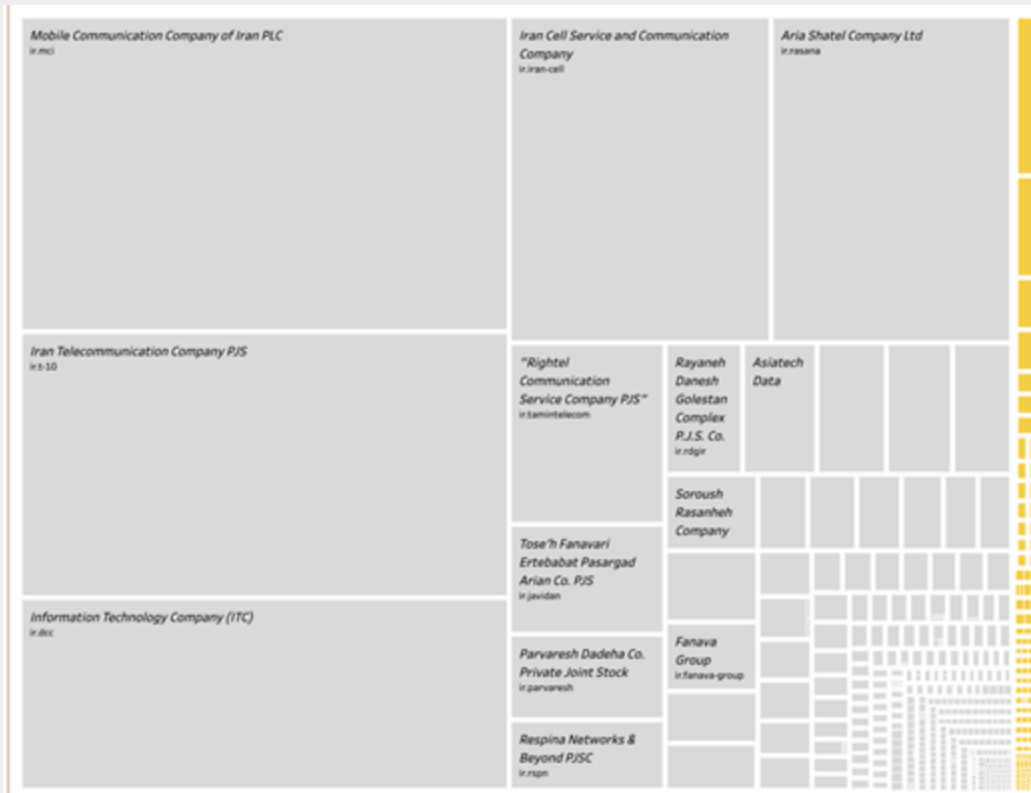


Iran - Country Statistics



RPKI - IPv4

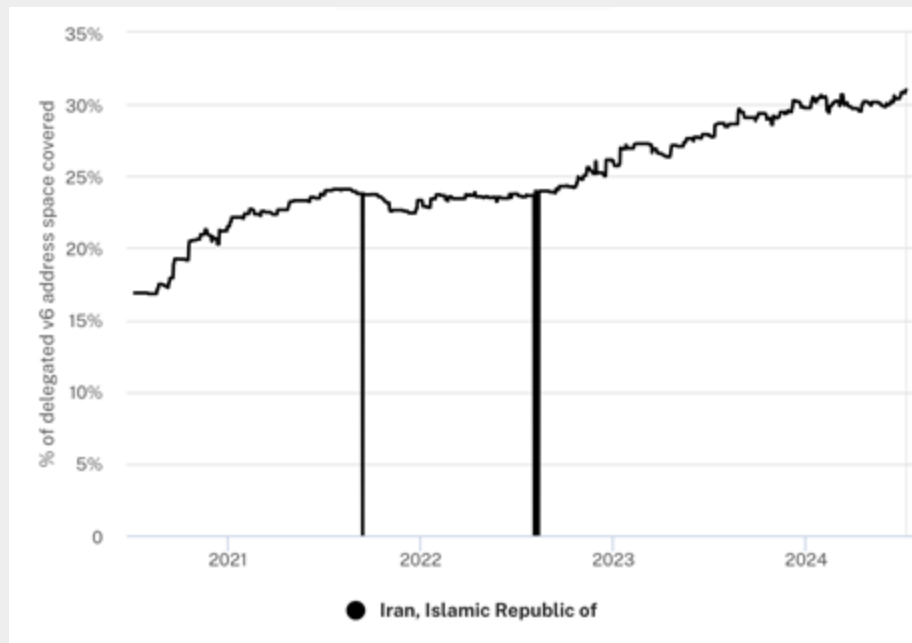
- Covered vs not covered
- IR.MABNA - 66K Uncovered vs 101K covered
- IR.MIHANCOMMS 42K uncovered vs 28K covered
- IR.UITC 21k uncovered vs 256 covered





RPKI - IPv6

- Due to low IPv6 adoption, RPKI is also low
- 31% covered by ROA





Questions & Comments



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RIPE NCC

RIPE NETWORK COORDINATION CENTRE

RIPE NCC and Sanctions

Athina Fragkouli | 17 September 2024 | Open House: Internet in Iran

Legal Background



- The RIPE NCC must comply with EU sanctions. Dutch authorities are responsible for their enforcement
 - UN sanctions are incorporated in EU sanctions. UN has no enforcement power.
- EU sanctions relate to:
 - Specific products and services to a specific country. RIPE NCC Services *are not included*
 - The provision of economic resources to *listed individuals/organisations*. The registration of Internet number resources is considered as economic resource
- Failure to comply is an offence under criminal law. A criminal court can impose fines, and individuals may be imprisoned for up to six years

2014 - Executive Board Resolution



*"The Executive Board of the RIPE NCC believes that the means of communication **should not be affected by political discussions or disputes**. This includes the provision of correctly registered Internet numbering resources.*

*The Executive Board of the RIPE NCC is committed to taking all lawful steps available to ensure that the RIPE NCC can provide **undisrupted services to all members across our service region.**"*

Communication with Dutch Authorities



- 2012: Confirmation from Dutch authorities that our services are not subject to country-specific sanctions
- 2020: Confirmation that the registration of IP addresses are “economic resources” under EU sanctions regulations
 - Sanctioned entities must be prevented from registering new resources and existing resources must be frozen (preventing transfers)
 - De-registration of resources not required
- 2020: Requested exemption from the Dutch authorities
 - Reply: no legal basis for exemption

2022 - EU Exemption Provision



'Article 6c

Article 2 shall not apply to funds or economic resources that are strictly necessary for the provision of electronic communication services by Union telecommunication operators, for the provision of associated facilities and services necessary for the operation, maintenance and security of such electronic communication services, in Russia, in Ukraine, in the Union, between Russia and the Union, and between Ukraine and the Union, and for data centre services in the Union.';

- Confirmed by the Dutch authorities that Internet number resources fall within the scope
- ***Relevant to Russian sanctions, not Iranian or Syrian***

Overview for 2024



	Iran	Syria	Russia
Sanctioned members	Frozen registration No invoices sent - fees still due, but not collected yet because of NL bank restrictions		Exemption applicable - Registration services provided
Non-sanctioned members	Registration services provided		
	No invoices sent - fees still due, but not collected yet because of NL bank restrictions		Invoices sent

Sanctions Process



- All current members and End Users constantly screened
- Third party tools to automate the screening
- Still a lot of manual checks, especially for indirect sanctions
 - Checking entities owned or controlled by listed entities/individuals
- During investigation the resources are locked
 - Liability in case of violation (no best effort basis or grace period)

Status on 1 July 2024



- 6 IR members with frozen registration records
- 1 IR End User with frozen registration records
- 5 IR members “non-cooperative”
- 1 IR End User “non-cooperative”
- RIPE NCC Quarterly Sanctions Transparency Report (Q3 2024) <https://www.ripe.net/publications/docs/ripe-827/>

Status on 1 July 2024						
Date	Action	Relation	Country	IPv4	IPv6	ASNs
01/04/2020	Frozen	Member	IR	17,408	/32	1
01/04/2020	Frozen	Member	SY	230,400	/29	1
16/01/2023	Marked as non-cooperative	Member	IR	1,024	/29	1
07/02/2023	Marked as non-cooperative	Member	IR	9,216	0	1
07/03/2023	Marked as non-cooperative	Member	IR	1,024	/29	1
19/07/2023	Marked as non-cooperative	Member	IR	8,192	/32	1
20/12/2023	Marked as non-cooperative	Member	IR	58,368	/29	1
20/12/2023	Marked as non-cooperative	End User	IR	0	0	1
15/05/2024	Frozen	Member	IR	2,048	0	1
15/05/2024	Frozen	Member	IR	33,792	/29	2
15/05/2024	Frozen	Member	IR	1,024	/29	1
15/05/2024	Frozen	Member	IR	1,024	0	1
15/05/2024	Frozen	End User	IR	0	0	1
15/05/2024	Frozen	End User	BY	0	0	1
15/05/2024	Frozen	End User	BY	512	0	1
15/05/2024	Frozen	End User	BY	0	0	1
01/07/2024	Frozen	Member	IR	99,328	/32, /29	3
Total	-	-	-	463,360	3x/32, 7x/29	20



Questions



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RIPE NCC

RIPE NETWORK COORDINATION CENTRE

RIPE NCC: Ultra High Risk Countries and Payments 2021-2024

Simon Jan Haytink
Chief Financial Officer

Ultra High Risk Countries and Dutch Banks



- Dutch banks use the term “Ultra High Risk Countries”
 - Dutch banks have received significant fines in the past for inadequate compliance
 - It is my opinion that based on this, they take a risk-based approach in classifying countries as Ultra High Risk
 - Result: Iran and Syria are classified as Ultra High Risk Countries by Dutch banks
- Different banks - Different risk appetites
 - Smaller banks will not accept RIPE NCC as a customer, as we are deemed a complex customer due to our service region
 - All three big Dutch banks have different risk appetites, some banks exclude more countries than others

Ultra High Risk Countries and Dutch Banks



- Effect on the RIPE NCC:
- Due to the banks' classification of Iran and Syria as Ultra High Risk Countries:
 - We are not allowed to receive money from these countries
- As the RIPE NCC, we have taken a very risk averse approach in this situation
- Reasoning: Having a bank account is a licence to operate
- Result: We have postponed payment obligations for Ultra High Risk Countries since 2021

Membership Fees at Risk (Quantified)



	2021	2022	2023	2024	LIRs Not Paid	Total LIRs	Total EUR
'Ultra High Risk'	145 kEUR	1,020 kEUR	1,249 kEUR	1,166 kEUR	727	727	3,580 kEUR

Ultra High Risk Countries and Dutch Banks



- Solutions
 - We are getting closer to a solution, but we are not there yet
 - This is due to our continued engagement with our banks
 - The banks seem to agree that the RIPE NCC's compliance efforts reduces the risk significantly
- For now, the postponed payment obligation still stands
- We do need your help

We Need Your Help



- Question to you all:
- If we could receive a payment from Iran:
 - What would the payment route look like?
 - Can you transfer from Iran directly to a Dutch bank account?
 - Would you need an intermediary bank?
 - Any other payment issues you would like to bring to our attention?
- All information you can share is valuable: simonjh@ripe.net
- Please note in all cases:
 - The origin of the funds (you, as the RIPE NCC member) must remain clear
 - Meaning only payment directly from our members
 - Paying via an acquaintance/friend etc will not be possible

I am Looking for Possible Payment Routes



Iranian Member



RIPE NCC





Questions



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