What is the FCC doing with BGP

And why should NANOG care?
FCC issues NPRM on 6 June 2024


- Notice of Proposed Rule Making
  - 60 days to submit comments
  - 30 days after to submit reply comments

- This presentation is based largely on materials that summarize the draft NPRM released on 16 May 2024

- The commission asserts Title II (of the Communications Act of 1934) authority is necessary to address cyber and national security threats within the nation's networks.
Proposed Reporting on BGP plans

• The nine largest ISPs would submit an initial “BGP Plan” and update annually.
• The plan would largely consist of reporting ROA coverage of prefixes originated prefixes under the ISP’s control as well as deployment of origin validation.
• Once 90% coverage is achieved, reporting is optional.
• Other quarterly reporting would still be required (only by the nine largest ISPs)
Possible Conditions on Service Provider Contracts

• The NPRM explores the possibilities of regulatory approaches to encourage the creation and maintenance of ROAs through contractual agreements between service providers and customers.

• Asks for comments on whether the FCC could require customer contracts to require that customers publish ROAs.
Outreach and Education

• The FCC asks a series of questions about education and outreach in particular to ISP customers. These include the following:
  • Possibility of large service providers supporting publications of ROAs by smaller, downstream providers
  • Educational campaigns led both by private and public entities to facilitate the publication of ROAs and deployment of ROV.
Questions?

• I probably don’t know, but I’ll try...