

Editorial Change ARIN-edit-2021-1: ASN Clarifications to Sections 2 and 8

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Current Text (19 August 2021)

Problem Statement:

The community has raised concerns that the current language in Section 8 is not clear regarding ASN-only transactions. There are also some language and reference inconsistencies which should be addressed while adjusting Section 8 and concordant adjustments to Section 2.

Policy statement:

Add a definition for ASN in Section 2:

Section 2.X Autonomous System Number (ASN)

An Autonomous System Number (ASN) is a unique identifier which represents a collection of network resources operated under a common routing policy administration, known as an autonomous system.

In Section 8.2:

Replace

“The Internet number resources being transferred as part of an 8.2 transfer will not be subject to a needs-based assessment during the process of the 8.2 transfer.”

with

“The Internet number resources being transferred as part of a transfer under section 8.2 will not be subject to a needs-based assessment during the process of the transfer.”

Replace

“The recipient must provide evidence that they have acquired the assets that use the resources to be transferred from the current registrant.”

with

“The recipient must provide evidence that it has acquired the assets that use the resources to be transferred from the current registrant.”

Replace

“The recipient must show that they have acquired the entire entity which is the current registrant.”

with

“The recipient must show that it has acquired the entire entity which is the current registrant.”

Replace

“An organization which serves as the source of an 8.2 IPv4 transfer will not be allowed to apply for IPv4 address space under section 4.1.8 ARIN Waitlist for a period of 36 months following said transfer unless the recipient organization remains a subsidiary, parent company, or under common ownership with the source organization.”

with

“An organization which serves as the source of an IPv4 transfer under section 8.2 will not be allowed to apply for IPv4 address space under section 4.1.8 ARIN Waitlist for a period of 36 months following said transfer unless the recipient organization remains a subsidiary, parent company, or under common ownership with the source organization.”

In Section 8.3:

Replace

“Number resources received as the result of an 8.2 transfer are out of scope for the purposes of this restriction.”

with

“Number resources received as the result of a transfer under section 8.2 are out of scope for the purposes of this restriction.”

In Section 8.4:

Replace

“Source entities within the ARIN region must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN for the 12 months prior to the approval of a transfer request, unless either the source or recipient entity owns or controls the other, or both are under common ownership or control. Number resources received as the result of an 8.2 transfer are out of scope for the purposes of this restriction.”

with

“Source entities within the ARIN region must not have received a transfer, allocation, or assignment of IPv4 addresses from ARIN for the 12 months prior to the approval of a transfer

request, unless either the source or recipient entity owns or controls the other, or both are under common ownership or control. Number resources received as the result of a section 8.2 transfer are out of scope for the purposes of this restriction.”

Add a space between “Section” and “4.4” in the fourth bullet under “Conditions on source of the transfer”

In Section 8.5.7:

Replace

“In lieu of 8.5.5 and 8.5.6, organizations may qualify for additional IPv4 address blocks by demonstrating 80% utilization of their currently allocated space.”

with

“In lieu of the requirements in sections 8.5.5 and 8.5.6, organizations may qualify for additional IPv4 address blocks by demonstrating 80% utilization of their currently allocated space.”

Replace

“An organization may qualify via 8.5.7 for a total of a /16 equivalent in any 6 month period.”

with

“An organization may qualify via section 8.5.7 for a total of a /16 equivalent in any 6 month period.”

Comments:

Timetable for implementation: Immediate

Anything Else: This proposal is intended to be purely editorial in nature. Staff and Legal review was performed on June 14, 2021.

Staff and Legal Review (14 June 2021)

Version Reviewed: [20 May 2021](#)

Staff Understanding:

ARIN-edit-2021-1 addresses a litany of minor inconsistencies in the text of Section 8 and adds a definition for Autonomous System Number (ASN) to Section 2. Consistency when referencing NRPM sections and IPv4 address space may add clarification for new readers, but adding an entire subsection is beyond the ordinary scope of an Editorial Change to the Number Resource Policy Manual. That said, ARIN-edit-2021-1 has been circulated for significant community feedback and presented at ARIN 47, which exceeds the typical exposure that the Editorial Change community review window provides.

It is notable that the scope of the changes involved in ARIN-edit-2021-1 appears to be beyond the implied scope of the title of “ASN Clarifications.”

It is also notable that while this Editorial Change addresses some references to NRPM sections, there are further references in the NRPM that are still inconsistent, which may be addressed by ARIN-edit-2021-1 or in future proposals (Sections 3.6.3., 4.1.8., 4.2.2., 4.2.3.8., 4.3.4., 6.5.4., 6.5.8.3., 6.11., for example, reference NRPM sections without use of the word “section”).

Additionally, adding a definition for Autonomous System Number without the addition of a definition for IP address creates an imbalance that may also be addressed by ARIN-edit-2021-1 or in future proposals.

Implementable as Written?: Yes

Impact on ARIN Registry Operations and Services:

There is no foreseen operational impact for this Editorial Change.

Legal Review:

This editorial policy proposal contains suggested updates to the Number Resource Policy Manual (NRPM) that are purportedly editorial and non-substantial in nature. After review, there are some aspects of the proposed changes that – while not affecting registry department processing – are more substantial in nature and therefore it would be best if the proposal was considered more than an ‘editorial’ change.

Those that appear to be purely editorial in nature contain no material legal issue.

The remaining proposed updates do contain a material legal issue from a process standpoint as they may need to go through the full policy development process. Note that the suggested changes themselves may not in substance carry any material legal issue; however, due to their apparently substantial nature, updating the NRPM as an editorial change causes material legal concern from a process perspective.

1. The proposed update to Section 8.3, adding “and/or ASN” to the list of various conditions on a source organization, appears to be substantial as those conditions are applicable to differing circumstances, including the particulars of a source organization’s specific number resource holdings. While this addition may seek to clarify language to be consistent with the policy’s intent, such an addition may fall outside the scope of a purely editorial change. In addition, if the specific conditions on a source organization are reviewed and are the subject of proposed updates, all the conditions should be reviewed for consistency and alignment.
2. The proposed update to Section 8.4 of adding “and/or ASN” is similar and carries the same concerns as the proposed update to Section 8.3 as stated in #1 above.
3. The proposed update to Section 8.5.6 changing general references to “space” to a specific reference to “IPv4 space” is likely a substantial change. While this proposal likely seeks to clarify the intent of the policy, such a change appears outside the scope of purely editorial.

The remainder of the proposed updates appear editorial and non-substantial in nature and thus carry no material legal issue.

Implementation Timeframe Estimate: Three months

Implementation Requirements:

- Staff training
- Updates to public documentation
- Updates to internal procedures and guidelines

History and Earlier Versions

History	
Action	Date
Proposal	15 January 2021
Draft Policy	23 February 2021
Revised	20 May 2021
Classified as Editorial Change	25 May 2021
Advanced to Board of Trustees	24 August 2021

Related Votes

ARIN-edit-2021-1 was advanced to the Board of Trustees from the 19 August 2021 AC Meeting with a vote of 14 in favor, 0 against.