

Recommended Draft Policy ARIN-2022-8: Streamlining Section 11 Policy Language

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History



Action	Date
Proposal	15 June 2022
Draft Policy	26 July 2022
Revised	19 September 2022
Revised	26 October 2022
Revised	13 February 2023
Recommended	23 February 2023
Revised	15 March 2023

Problem Statement



- Section 11 of the Number Resource Policy Manual (NRPM) contains a great deal of language that is either explicitly not policy or is not impactful on ARIN's administration of Internet number resources for experimental allocations, or to the customers requesting said resources.
- A revision to transform Section 11 into a collection of policies for experimental allocations serves to make the section more easily digested by the reader, and a more functional reference for customers and ARIN staff during experimental allocation requests.

Policy Statement



- Current text:

- **Experimental Internet Resource Allocations**

- ARIN will allocate Numbering Resources to entities requiring temporary Numbering Resources for a fixed period of time under the terms of recognized experimental activity. "Numbering Resources" refers to unicast IPv4 or IPv6 address space and Autonomous System numbers. The following are the criteria for this policy:

- Proposed text:

- **Experimental Internet Resource Allocations**

- ARIN will allocate Internet Number Resources to organizations requiring temporary Internet Number Resources for a fixed period of time under the terms of a recognized experimental activity.

Policy Statement



- Section 11.1 Current text:
 - **11.1. Documentation of Recognized Experimental Activity**
 - A Recognized Experimental Activity is one where the experiment's objectives and practices are described in a publicly accessible document. It is a normal requirement that a Recognized Experimental Activity also includes the undertaking that the experiment's outcomes be published in a publicly accessible document at the end of the experiment. The conditions for determining the end of the experiment are to be included in the document. Applicants for an experimental allocation are expected to demonstrate an understanding that when the experiment ends, the allocation will be returned; a successful experiment may need a new allocation under normal policies in order to continue in production or commercial use, but will not retain the experimental allocation.

Policy Statement



- A “publicly accessible document” is a document that is publicly and openly available free of charges and free of any constraints of disclosure.
- ARIN will not recognize an experimental activity under this policy if the entire research experiment cannot be publicly disclosed.
- ARIN has a strong preference for the recognition of experimental activity documentation in the form of a document which has been approved for publication by the IESG or by a similar mechanism as implemented by the IETF.

Policy Statement



- Proposed text:
 - **11.1. Eligibility Criteria for Recognized Experimental Activity**
 - The eligibility criteria for a recognized experimental activity under this policy are:
 - The experiment's description and objectives are published in a publicly accessible document, which for the purposes of this policy means that the document is readily available free of charge to the public, and free of any constraints of disclosure within one year after the end of the experiment;
 - The experiment's outcomes must also be published in a publicly accessible document;
 - Demonstration to ARIN that the experimental activity is technically sound; and
 - Demonstration to ARIN that the experimental activity is technically coordinated in that consideration of any potential negative impact of the proposed experiment on the operation of the Internet and its deployed services has been considered, and a description of experimenter mitigation plans to contain any negative impacts has been provided.

Policy Statement



- Section 11.4 Current text:
 - **11.4. Resource Allocation Term and Renewal**
 - The Numbering Resources are allocated for a period of one year. The allocation can be renewed on application to ARIN providing information as per Detail One. The identity and details of the applicant and the allocated Numbering Resources will be published under the conditions of ARIN's normal publication policy. At the end of the experiment, resources allocated under this policy will be returned to the available pool.

Policy Statement



- Proposed text:
 - **11.4. Resource Allocation Term and Renewal**
 - The Internet Number Resources are allocated for a period of one year under this policy. The allocation can be renewed on application to ARIN, prior to the expiry of the one-year period, providing information as to why an extension is necessary for a successful experiment. The resources allocated under this policy must be returned to ARIN at the earliest of: (1) the recognized experimental activity has ended; or (2) the end of the one-year period and any extension thereof.

Policy Statement



- Section 11.5 Current text:
 - **11.5. Single Resource Allocation per Experiment**
 - ARIN will make one-off allocations only, on an annual basis to any applicant. Additional allocations to an organization already holding experimental activity resources relating to the specified activity outside the annual cycle will not be made unless justified by a subsequent complete application.
 - It's important for the requesting organization to ensure they have sufficient resources requested as part of their initial application for the proposed experimental use.

Policy Statement



- Proposed text:
 - **11.5. Single Resource Allocation per Experiment**
 - ARIN will make only one allocation per recognized experiment. An allocation may consist of multiple Internet Number Resources if required to conduct the recognized activity. Additional allocations to an organization already holding experimental activity resources will not be made under this policy unless justified by a subsequent complete application relating to a different experimental activity.

Policy Statement



- Section 11.7 Current text:
 - **11.7. Resource Allocation Guidelines**
 - The Numbering Resources requested come from the global Internet Resource space, do not overlap currently assigned space, and are not from private or other non-routable Internet Resource space. The allocation size shall be consistent with the existing ARIN minimum allocation sizes, unless smaller allocations are intended to be explicitly part of the experiment. If an organization requires more resources than stipulated by the minimum allocation size in force at the time of its request, the request must clearly describe and justify why a larger allocation is required. All research allocations must be registered publicly in whois. Each research allocation will be designated as a research allocation with a comment indicating when the allocation will end.

Policy Statement



- Proposed text:
 - **11.7. Resource Allocation Guidelines**
 - The Internet Number Resources requested come from the global Internet Number Resource space, shall not overlap any currently assigned space, and shall not be from private or other non-routable Internet Number Resource space. The allocation size shall be consistent with existing ARIN minimum allocation sizes, unless smaller allocations are explicitly required due to the nature of the experiment. If an organization requires more resources than stipulated by the minimum allocation size in force at the time of its request, the request must clearly describe and justify why a larger allocation is required. All research allocations must be registered publicly in ARIN's directory services. Each research allocation will be designated as a research allocation with a comment indicating when the allocation will end.

Policy Statement



- Section 11.8 Current text:
 - **11.8. Commercial Use Prohibited**
 - If there is any evidence that the temporary resource is being used for commercial purposes, or is being used for any activities not documented in the original experiment description provided to ARIN, ARIN reserves the right to immediately withdraw the resource and reassign it to the free pool.

Policy Statement



- Proposed text:
 - **11.8. Commercial Use Prohibited**
 - If there is any evidence that the temporary resource is being used for commercial purposes or is being used for any activities not documented in the original experiment description provided to ARIN, ARIN reserves the right to immediately withdraw the resource.

Policy Statement



- Retire Sections 11.2, 11.3, 11.6, 11.9

Community Feedback



- Community feedback provided via the Public Policy Mailing List (PPML) focused on:
 - Suggestions for additional clarifications that have been adopted
 - A dialog aimed at clarifying how and when the policy is or should be used, bearing in mind that the purpose of this policy is to clarify the existing text, rather than significantly alter the policy
 - There was no further comment following the most recent revision to the text on 15 March 2023

Staff and Legal Review (13 March 2023)



- **Staff Understanding**

- This Draft Policy makes substantial revisions to NRPM Section 11. Experimental Internet Resource Allocations. The suggested changes appear to accomplish the problem statement task of “A revision to transform Section 11 into a collection of policies for experimental allocations serves to make the Section more easily digested by the reader, and a more functional reference for customers and ARIN staff during experimental allocation requests.”

Staff and Legal Review (13 March 2023)



- Previously, staff recommended adding “and” before the final criterion of any lists, removing “the” from “existing the ARIN minimum allocation sizes” in Section 11.7,” and clarifying the return language in 11.4. Staff also recommended sharing the revisions as a tracked document via the comments section. This has all been addressed in the current version.

Staff and Legal Review (13 March 2023)



- Staff also recommended the following additional revisions to the text, which have also been made:
 - **Section 11.4 Resource Allocation Term and Renewal**
 - Current Proposed Text - The resources allocated under this policy must be returned to ARIN at the earliest of: (1) the recognized experimental activity has ended; and (2) the end of the one-year period and any extension thereof.

Staff and Legal Review (13 March 2023)



- Recommendation - This text presents two scenarios and the occurrence of the earliest of those events requires the return of the resources; not the occurrence of both events. Therefore, it is recommended that "or" be used instead of "and." "The resources allocated under this policy must be returned to ARIN at the earliest of: (1) the recognized experimental activity has ended; and or (2) the end of the one-year period and any extension there of the available pool."



- **Section 11.4 Resource Allocation Term and Renewal**

- **Current Proposed Text:** The allocation can be renewed on application to ARIN prior to the expiry of the one-year period providing information as to why an extension is necessary for a successful experiment.
- **Recommendation:** For clarity, treat the phrase “prior to the expiry of the one-year period” as a parenthetical by adding commas: “The allocation can be renewed on application to ARIN, prior to the expiry of the one-year period, providing information as to why an extension is necessary for a successful experiment.” Alternatively, the phrase could be moved to the beginning of the sentence.

Staff and Legal Review (13 March 2023)



- **Implementable as Written?** Yes
- **Impact on ARIN Registry Operations and Services:** None.
- **Legal Review:** No material legal issue.
- **Implementation Timeframe Estimate:** Three months
- **Implementation Requirements:**
 - Staff training
 - Updates to public documentation
 - Updates to internal procedures and guidelines

Questions?
Comments?



QUESTION FOR THE COMMUNITY

Does the community support the policy as currently written?

Thank You

