Draft Policy 2013-6

Allocation of IPv4 and IPv6 Address Space to Out-of-region Requestors

2013-6 - History

1. Origin: ARIN-prop-189 (May 2013)
2. AC Shepherds: David Farmer, Bill Darte, and Milton Mueller
3. Accepted as Draft Policy – June
4. Revised - September
5. Staff assessment – September
6. Revised again - September
7. Draft Policy online & in Discussion Guide

   https://www.arin.net/policy/proposals/2013_6.html

2013-6 – ARIN Staff Summary

- **This policy would require requesters to provide proof of legal presence within the ARIN region and to demonstrate that a majority (or plurality) of their technical infrastructure and customers are within the ARIN region in order to qualify and receive IPv4 and IPv6 addresses.**

2013-6 – Status at other RIRs

- **AFRINIC**: "AfriNIC resources are for AfriNIC service region and any use outside the region should be solely in support of connectivity back to the AfriNIC region."
  - http://www.afrinic.net/en/library/policies/697-ipv4-soft-landing-policy
- **APNIC**: No specific policy text.
- **LACNIC proposal**
  - "Principles Governing the Distribution of Number Resources"
  - "1.11 Principles for Proper Administration and Stewardship
  - "The numbering resources under the stewardship of LACNIC must be distributed among organizations legally constituted within its service region and mainly serving networks and services operating in this region. External clients connected directly to main infrastructure located in the region are allowed."
  - http://www.lacnic.net/documents/10834/393498/lac-2013-02-EN.pdf
- **RIPE**
  - "Membership is open without conditions."

2013-6 – Staff Assessment

Staff and Legal Assessment of the 4 Sep version – still applicable

Staff Comments: Issues/Concerns?

- Formalizes ARIN's existing practice with respect to requiring the requestor to have a legal presence in the ARIN region and to operate a network in region.
- Would also create new practice and processes via inclusion of the statement "a plurality of resources requested from ARIN must be justified by technical infrastructure and customers located within the ARIN service region".
  - Could create a scenario where a network can't get IPv4/IPv6 addresses from any RIR.
  - Unclear how the location of hosted customers is defined.
  - There are potential implications with respect to IPv6 and proposed policy text; in particular, does the community want an organization to be able to get all space from one RIR when it comes to IPv6?

Resource Impact: Minimal (3 months)

  - Updated guidelines and staff training

2013-6 – Legal Assessment

- The current draft seeks to fill an important gap in ARIN's policies; more specifically, policy guidance that clearly describes the degree to which a proposed recipient of number resources from ARIN has to have real installations and customers in the ARIN region.

- From a legal standpoint, there are two possible spectrum points of policy to avoid: first, having inadequate policy guidance would leave policy implementation subject to a high degree of staff interpretation; and at the other end, adopting an overly prescriptive guidance or standard that fails to permit multinational business entities to obtain number resources that are needed both in the ARIN region and outside of the ARIN region from ARIN. Both extremes are unattractive for a standard setting organization such as ARIN.

- In particular, the current text: 'plurality of resources requested from ARIN must be justified by technical infrastructure and customers located within the ARIN service region' should be carefully evaluated, as it sets the policy requirement of 'plurality' that may prove unnecessarily restrictive in some cases. A lower standard is recommended to avoid otherwise valid requesters for addressresources from being precluded from obtaining number resources.

- Note that policy language which provides for reasonable restrictions (e.g. requiring more than a fictitious or tenuous and limited presence for the recipient to receive the resources in this region and/or clear intention to make use of some of the resources within the region) can be adopted without creating serious legal risk.

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2013-6 – Work in Progress

Draft policy still being developed by the AC

- Posted to PPML and presented for community discussion
  - Fair and Impartial Number Resource Administration?
  - Technically Sound?
  - Supported by the Community?
- Staff/legal assessment can be performed again upon request of AC (when draft is fully developed)

2013-6 – Recent PPML Discussion

- "'Plurality' is a precisely defined mathematical concept. The part I have a problem with is 'a network located within the ARIN service region.'"

- "As far as law enforcement agencies are concerned, the problem is not so much a question of depletion of the IPv4 pool but of traceability back to the attacker… Maybe ARIN's policy should be consistent regarding the allocation of both IPv4 and IPv6 addresses requesting that stakeholders have sufficient attachment to the region prior to receiving IP addresses from ARIN."

- "ARIN-2013-6 would be a change to the existing policy, as it would make clear that customer growth in-region would be necessary to justify requests, whereas presently we have some folks requesting resources using nominal equipment within the region and backed by extensive customer growth external to the region."