2014-2 Improving 8.4 Anti-Flip Language

Problem Statement

Current policy prevents an organization that receives BLOCK A in the previous 12 months from transferring to their own organization in another RIR a different block, BLOCK B, though it may have been issued years ago.

Current 8.4 Policy Language

8. Transfers

- 8.1. Principles
- 8.2. Mergers and Acquisitions
- 8.3. Transfers between Specified Recipients within the ARIN Region
- 8.4. Inter-RIR Transfers to Specified Recipients

Inter-regional transfers may take place only via RIRs who agree to the transfer and share reciprocal, compatible, needs-based policies.

- Conditions on the Source of the Transfer
- Conditions on the Recipient of the Transfer

8.4 Conditions on the Source

- The source entity must be the current rights holder of the IPv4 address resources recognized by the RIR responsible for the resources, and not be involved in any dispute as to the status of those resources.

- Source entities outside of the ARIN region must meet any requirements defined by the RIR where the source entity holds the registration.

- Source entities within the ARIN region will not be eligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.

- **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.** This restriction does not include M&A transfers.

- The minimum transfer size is a /24.

8.4 Conditions on the Recipient

- The conditions on a recipient outside of the ARIN region will be defined by the policies of the receiving RIR.

- Recipients within the ARIN region will be subject to current ARIN policies and sign an RSA for the resources being received.

- Recipients within the ARIN region must demonstrate the need for up to a 24-month supply of IPv4 address space.

- The minimum transfer size is a /24.

Proposal/Draft Discussion Summary

- Delete all policy language associated with Inter-RIR Transfers

- Modify policy language to resolve problem statement by <u>allowing organizations to transfer</u> blocks to their own organization and subsidiaries

- Modify policy language to resolve problem by <u>restricting the transfer of blocks</u> received

Newly Modified Policy Statement

8. 4 Language remains largely the same

- The source entity must be the current rights holder of the IPv4 address resources recognized by the RIR responsible for the resources, and not be involved in any dispute as to the status of those resources.

- Source entities outside of the ARIN region must meet any requirements defined by the RIR where the source entity holds the registration.

- Source entities within the ARIN region will not be eligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.

- **Source entities within the ARIN region may not transfer a block or portion of a block received within the past 12 months.** This restriction does not include M&A transfers.

- The minimum transfer size is a /24.

ARIN Staff and Legal Review

- Legal review noted no significant legal issues
- Staff review noted that this draft language would make it easier for an organization to "get resources from ARIN and immediately transfer them out of region".
- Explanation: You couldn't transfer the 'new block' out of region, but you could transfer another block (older than 12 months).
- And, after exhaustion, you would still have to wait to transfer blocks received by transfer.

So…..

… you either want to loosen the restrictions on Inter-RIR language as this does…or not.

… if you do, then you must decide if this is the language that best does it…or if not… suggest alternative, better language.

… if you don't want to loosen restrictions, then please tell the AC that clearly.

What's next?

- A 'Recommended' Draft Policy must be clear, technically sound, needed and supported by the community.

- A Draft Policy can be abandoned if the community clearly opposes the Draft and continued work on the problem.

- At the microphones, please state your support or opposition to this draft.

- Your questions and comments will help the AC judge these criteria.