Policy Experience Report

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Purpose of Policy Experience Report

- Review existing policies
  - **Ambiguous text/Inconsistencies/Gaps/Effectiveness**
- Identify areas where new or modified policy may be needed
  - **Operational experience**
  - **Customer feedback**
- Provide feedback to community and make recommendations when appropriate

Subject Policies

- POC Validation
- 8.2 Transfers (Reorganizations)
- Experience with /24s
- Immediate Need

POC Validation

- NRPM 3.6 – Annual Whois POC Validation
  - 3.6.1 – Method of Annual Verification
    During ARIN's annual Whois POC validation, an email will be sent to every POC in the Whois database.
- Note: Points of Contact (POC) that receive ARIN validation email are associated with:
  - **POCs for direct assignments from ARIN**
  - **POCs for direct allocations from ARIN**
  - **POCs put on reassignments records by their ISPs**

POC Validation

- For POCs associated with direct allocations/ assignments from ARIN
  - **Generally accepting and understanding of the process**
  - **Occasionally call help-desk with related questions**
- For POCs only associated with reassignment records
  - **Generally unhappy with the process**
  - **Generates multiple complaints per week**
  - **Generates requests for ARIN to remove their reassignment data and point of contact record from database**
  - **Issue: ARIN is not authorized to remove the reassignment records created by ISPs.**

POC Validation

- Stats…
  - **Nearly half of all helpdesk calls are related to POC validation**
  - **Average of 600 hostmaster emails per month related to POC validation**
- Issue
  - **Creating a significant customer service concern for ARIN**
- Considerations for potential policy changes
  - **Not performing annual POC validation for POCs only associated with reassignment records?**
  - **Having ISPs perform annual POC validation for their reassignment blocks?**
  - **Having ISPs notify customers at reassignment of their contact obligations and annual validation?**

8.2 Transfers (Reorganizations)

NRPM 8.2. Mergers and Acquisitions

ARIN will consider requests for the transfer of number resources in the case of mergers, acquisitions, and **reorganizations** under the following conditions:

- **The new entity must provide evidence that they have acquired assets that use the resources to be transferred from the current registrant. …**

8.2 Transfers (Reorganizations)

- Problem
  - **It is not clear to some customers that reorganizations are allowable for transfers (they don't see it in the title)**
  - **Customers are confused by the requirement in bullet #1 (previous slide) for cases of reorganization**

- Recommendation
  - **Add "reorganizations" to policy title**
  - **Clarify that bullet #1 in policy does not apply to reorganizations**

Experience with /24s

- ARIN's minimum allocation/assignment size recently reduced to a /24

- Existing requirements and criteria remained in place for both ISPs and end-users

  - **These two circumstances have made it easy for end-user organizations to obtain a /24 from ARIN (probably intended)**

  - **These two circumstances have made the requirements for ISPs more difficult to meet than for end-users (probably not intended)**

Experience with /24s

4.2.2. Initial allocation to ISPs

4.2.2.1. ISP Requirements
        All ISP organizations must satisfy the following requirements:

4.2.2.1.1. Use of /24

The efficient utilization of an entire previously allocated /24 from their upstream ISP. This allocation may have been provided by an ISP's upstream provider(s), and does not have to be contiguous address space.

Experience with /24s

4.3. End-users - Assignments to end-users

4.3.3. Utilization rate

Utilization rate of address space is a key factor in justifying a new assignment of IP address space. Requesters must show exactly how previous address assignments have been utilized and must provide appropriate details to verify their one-year growth projection. The basic criteria that must be met are:

- **A 25% immediate utilization rate, and**
- **A 50% utilization rate within one year.**

Experience with /24s

4.2.3.6. Reassignments to multihomed downstream customers

…

"This policy allows a downstream customer's multihoming requirement to serve as justification for a /24 reassignment from their upstream ISP, regardless of host requirements."

…

- **Note that this policy allows "upstream ISP" organizations to use multi-homing needs of a customer as sole justification for /24. This policy does not allow ARIN to do the same.**

Experience with /24s

- Status of /24 Requests
  - **End-users seem ok with policy**
  - **ISPs are complaining that policy is simpler for end-users**
  - **Customers (both end-user and ISP) are complaining about non-applicability of the policy that allows upstream ISPs to use multi-homing as sole justification for a /24**
  - **We are hearing from customers that many ISPs are now unwilling to reassign them a /24, citing either unavailability in their own inventory or the customer ability to now go to ARIN for that size prefix.**

- Considerations for Potential Policy Changes
  - **Allow ISPs to request /24s with the same ease as end-users?**
  - **Allow multi-homing to serve as sole justification for an IPv4 /24 from ARIN for both ISPs and end-user type organizations?**

Immediate Need

- 4.2.1.6. Immediate need
  - **If an ISP has an immediate need for address space, and can provide justification to show that the address space will be utilized within 30 days of the request, ARIN may issue a block of address space, not larger than a /16 nor smaller than ARIN's customary minimum allocation, to that organization. These cases are exceptional.**

Immediate Need

- Example Exceptional Cases ARIN Has Approved
  - **Customer contracts as justification for services turned in within 30 days along with other supporting documentation**
  - **Migration of 911 services from a contractor to self-administered**
- Example Cases ARIN Has Not Considered Exceptional
  - **Very Common: Citing need to stage network equipment (and providing invoices to prove purchase) to serve future customer needs not within the next 30 days**
- Considerations for Potential Policy Changes
  - **Continue current practice of considering immediate need to be based on clear customer impact or other exceptional circumstances?**
  - **Make explicit in the policy that immediate need may be based on numbering new equipment?**
  - **Eliminate Immediate Need policy?**