



Recommended Draft Policy ARIN-2015-2: Modify 8.4 (Inter-RIR Transfers to Specified Recipients)

Staff Introduction

2015-2 History



- Proposed in May 2015 (ARIN-prop-216)
- AC Shepherds: Cathy Aronson, Chris Tacit
- Presented at:
 - **2 Public Policy Meetings**
 - **2 Public Policy Consultations**
- Revised: February 2016, April 2016, May 2016
- Recommended for adoption: May 2016
- Text in Discussion Guide and at:
 - **https://www.arin.net/policy/proposals/2015_2.html**

Staff and Legal Review (May 2016)



- Staff Understanding:
 - **Currently, organizations are unable to act as a source on an 8.4 transfer of IPv4 address space if they have received IPv4 address space in the past 12 months from ARIN's IPv4 free pool, the waiting list for unmet requests, or an 8.3 transfer. This draft policy lifts the 12-month restriction in cases when the source or recipient entity owns or controls the other, or both are under common ownership or control.**

Staff and Legal Review (continued)



- Staff Comments:
 - **If this policy is implemented, ARIN staff would no longer apply a 12-month time restriction to organizations who wish to 8.4 transfer IPv4 addresses to themselves or in cases when the source or recipient entity owns or controls the other, or both are under common ownership or control.**
 - **This policy could be implemented as written.**

Staff and Legal Review (continued)



- Legal Assessment:
 - **Concerns raised by the GC regarding previous versions of this policy have been satisfactorily addressed in the current draft. The current proposed draft does not create material legal issues for ARIN. In order to determine when entities are under common ownership or control, traditional legal standards will be applied by ARIN.**

Staff and Legal Review (continued)



- Resource Impact:
 - **Implementation of this policy would have minimal resource impact. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:**
 - **Updated guidelines and internal procedures**
 - **Staff training**

Presentation by the AC