Recommended Draft Policy ARIN-2016-5: Post-IPv4-Free-Pool-Depletion Transfer Policy

Staff Introduction

2016-5 History

- Proposed in June 2016 (ARIN-prop-230)
- AC Shepherds: Leif Sawyer, David Huberman
- Has not been presented at a PPM or PPC
- Recommended for adoption: September 2016
- Text in Discussion Guide and at:
  - **https://www.arin.net/policy/proposals/2016_5.html**

Staff and Legal Review (September 2016)

- Staff Understanding:
  - **Draft Policy 2016-5 creates clear policy separation between the needs-assessment work conducted for transfers and the assessments conducted for non-transfer related IPv4 requests.**
  - **More specifically, the draft policy places needs-assessment related policy language for transfers in Section 8 of the NRPM and removes use of Section 4 of the NRPM from the transfer process completely.**

Staff and Legal Review (continued)

- Staff Comments (1 of 3):
  - **If implemented, staff would no longer use Section 4 of the NRPM, but would use Section 8 to review needs-assessments for transfers (8.2, 8.3 recipient, 8.4 recipient, and transfer pre-approvals).**
  - **Use of "block(s)" without "IPv4" may introduce ambiguity that will confuse customers of the transfer processes. In the past, staff has found ambiguity and/or concern about unclear elements of the process prevents customers from using or completing the transfer process.**

Staff and Legal Review (continued)

- Staff Comments (2 of 3):
  - **Potential Issue #1: Transfer customers may interpret Section 8.5.1 to require a newly signed RSA for each transfer they receive. ARIN staff interpretation of the Section 8.5.1 language is that organizations that already have a recently signed RSA (within the last two versions) on file with ARIN may not need to sign a new RSA each time they receive a transfer. Suggested wording should read something similar to "The receiving entity must sign an RSA covering all resources to be transferred unless that entity has a current (within the last two versions) RSA on file."**

Staff and Legal Review (continued)

- Staff Comments (3 of 3)

 – **Potential Issue #2: Staff interpretation of 8.5.6 intent is that all previous IPv4 blocks must be *cumulatively* utilized to the rate of 50%. Existing policy may cause customer/staff confusion. For instance; if an organization has utilized 99% of a /10 and 25% of a /20, they may be deemed ineligible for additional IPv4 via needs-assessment.**

 – **Suggestion: Clarify such as "Organizations with direct assignments or allocations from ARIN must have efficiently utilized at least 50% of their cumulative IPv4 address blocks in order to receive additional space. This includes all space reassigned to their customers."**

 – **To properly implement the policies of 2016-5, staff would require clarification on the potential issues cited above.**

Staff and Legal Review (continued)

- Legal Assessment:
  - **The policy does not appear to create any material legal issue.**

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