



Policy Experience Report

John Sweeting
Senior Director, Registration Services

Purpose

The community must ultimately decide what to do

- Propose change/removal of an existing policy
- Propose a new policy
- Leave policy as-is

Provide feedback on Number Resource Policy Manual (NRPM) policies

- Policies that may not be working as expected
- Gaps, discrepancies, etc. in policy
- Customer feedback
- Ideas for potential new policies

Policies Reviewed

- 4.1.8. Unmet requests
 - 4.1.8.1. Waiting list
 - 4.1.8.2. Fulfilling unmet needs



4.1.8. Unmet requests

- In the event that ARIN does not have a contiguous block of addresses of sufficient size to fulfill a qualified request, ARIN will provide the requesting organization with the option to specify the smallest block size they'd be willing to accept, equal to or larger than the applicable minimum size specified elsewhere in ARIN policy. If such a smaller block is available, ARIN will fulfill the request with the largest single block available that fulfills the request. If no such block is available, the organization will be provided the option to be placed on a waiting list of pre-qualified recipients, listing both the block size qualified for and the smallest block size acceptable.
- Repeated requests, in a manner that would circumvent [4.1.6](#), are not allowed: an organization may only receive one allocation, assignment, or transfer every 3 months, but ARIN, at its sole discretion, may waive this requirement if the requester can document a change in circumstances since their last request that could not have been reasonably foreseen at the time of the original request, and which now justifies additional space. Qualified requesters whose request cannot be immediately met will also be advised of the availability of the transfer mechanism in section [8.3](#) as an alternative mechanism to obtain IPv4 addresses.

4.1.8.1. Waiting list/ 4.1.8.2. Fulfilling unmet needs



4.1.8.1. Waiting list

- The position of each qualified request on the waiting list will be determined by the date it was approved. Each organization may have one approved request on the waiting list at a time.

4.1.8.2. Fulfilling unmet needs

- As address blocks become available for allocation, ARIN will fulfill requests on a first-approved basis, subject to the size of each available address block and a timely re-validation of the original request. Requests will not be partially filled. Any requests met through a transfer will be considered fulfilled and removed from the waiting list.

Observations



Organizations are receiving addresses and then transferring them

- ~24% of the space issued to the waiting list has been transferred (most in /16 or /17 units)
- One year waiting period does not seem to have any impact
- 8.2 transfers can be used to effectively bypass the 1 year restriction

Organizations already having a substantial amount of space

- 4 orgs currently on the waiting list have more than a /16

The majority are first-timers asking for smaller blocks

- Of the 241 requests on the waiting list, 154 (64%) are requesting an initial block and 148 (61%) would accept a /21 or less

Observations continued

Blocks are being transferred via 8.2 transfers that are probably specified recipient transfers

- Source sells router + customer base to recipient
- By policy qualifies as an 8.2 since assets are changing hands

24 month need is very difficult to predict

- Difficult to verify legitimate requests from potentially unjustified requests

Evidence of collusion

- At least one case where multiple large blocks were obtained by multiple organizations and transferred via 8.2 to a single organization

M&A transfers occurring while organization is on waiting list



Relevant Data

209 of 241 requests on the waiting list (87%) are for a /21 or smaller

- Imposing a /21 maximum would impact only 13% of requests on the waiting list

5 of the 241 requests on the waiting list (2%) are for orgs that already have a /16 equivalent or more

- Imposing a /16 threshold would remove these orgs from the list

Questions For The Community



- Should a waiting list recipient be able to transfer the block they received? If so, should the waiting period be longer?
- Should an org be eligible for the waiting list if that org already has a substantial amount of space?
- Should an org be able to able to get multiple blocks from the waiting list?
- Should first timers get priority?
- Should a maximum block size be imposed?

Options Overview



Status Quo

- Maintain current ARIN's current waitlist approach

Other Options

- Optimize waitlist processing to better serve the ARIN community and ARIN's mission

Waiting List Transfers

Status Quo

- One year waiting period before the block can be transferred
- Main issue: creates a financial incentive for orgs to try and get as much space as possible

Other Options

- Disallow waiting list blocks from being transferred, as we do with 4.10 and 4.4 blocks
- Disallow waiting list blocks from being transferred if the transaction is effectively a sale of addresses

Waiting List Block Size

Status Quo

- No maximum block size
- Main problem: evaluating max size takes time and prevents other orgs from getting space
- Was the waiting list really intended for people to get a large block of addresses?

Other Options

- Impose maximum block size
- Would ensure more orgs can get space

Waiting List Priority

Status Quo

- Oldest request that can be filled, is filled
- Main problem: doesn't recognize that some need can be considered more justified than others

Other Options

- Priority for some types of organizations (start ups, non-profit, others)
- Restrict the amount of space an organization can hold prior to being approved for the waitlist
- Limit total number of blocks an organization can receive via the waiting list



Phase Out ARIN Waiting List

Status Quo

- Continue recovering space to fill waiting list requests
- Distribute using waiting list

Other Options

- Strengthen ARIN's ability to serve the community by utilizing recovered IPv4 resources to build an ARIN Endowment or other worthy purpose (e.g. community grant program)
- Would significantly simplify ARIN number resource policy

Discussion

