

Draft Policy ARIN-2023-8: Reduce 4.1.8 Maximum Allocation

Gerry George and Brian Jones



Problem Statement

Current Text (30 September 2024)

4.1.8 waiting times are too long, making justifications untimely by the time a request is met. New entrants to the waiting list are expected to wait three years for their need to be met under current policy, with a waiting list of around 700 at this point.

Data indicates that reducing the current /22 maximum further to a /24 would significantly reduce this waiting period, and further tightening the requirements by replacing the /20 recipient maximum holdings with a /24, and preventing multiple visits to the waiting list queue.

Policy Statement

4.1.8. ARIN Waitlist

ARIN will only issue future IPv4 assignments/allocations (excluding 4.4 and 4.10 space) from the ARIN Waitlist. The maximum size aggregate that an organization may qualify for is a **/24**.

Organizations which ever held any IPv4 space other than special use space received under section 4.4 or 4.10 are not eligible to apply.

Address space distributed from the waitlist will not be eligible for transfer, with the exception of Section 8.2 transfers, for a period of 60 months. This policy will be applied to all future distributions from the waitlist to include those currently listed. Qualified requesters will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

Waiting list recipients must demonstrate the need for a /24 on an operating network.

This policy will apply to waitlist requests received following the implementation of this policy. Waitlist requests received prior to the implementation of this policy will not be affected.



Policy Statement - (cont.)

In section 4.2.2 replace the sentence:

FROM:

"All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /22, subject to ARIN's minimum allocation size."

TO:

"All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of a /24."

In section 8.3 Conditions on the source of the transfer, remove this sentence:

"The source entity will not be allowed to apply for IPv4 address space under Section 4.1.8 ARIN Waitlist for a period of 36 months following the transfer of IPv4 address resources to another party."

Policy Statement

PROPOSED UPDATED TEXT (4.1.8 maximum allocation)

4.1.8. ARIN Waitlist

ARIN will only issue future IPv4 assignments/allocations (excluding 4.4 and 4.10 space) from the ARIN Waitlist. The maximum size aggregate that an organization may qualify for is a /24.

Organizations which ever held any IPv4 space other than special use space received under section 4.4 or 4.10 are not eligible to apply.

Address space distributed from the waitlist will not be eligible for transfer, with the exception of Section 8.2 transfers, for a period of 60 months. This policy will be applied to all future distributions from the waitlist to include those currently listed. Qualified requesters will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

Waiting list recipients must demonstrate the need for a /24 on an operating network.

This policy will apply to waitlist requests received following the implementation of this policy. Waitlist requests received prior to the implementation of this policy will not be affected.



Current NRPM Text

4.1.8. ARIN Waitlist

ARIN will only issue future IPv4 assignments/allocations (excluding 4.4 and 4.10 space) from the ARIN Waitlist. The maximum size aggregate that an organization may qualify for at any one time is a /22. Organizations will be able to elect a smaller block size than they qualify for down to a /24. Organizations which hold more than a /20 equivalent of IPv4 space in aggregate (exclusive of special use space received under section 4.4 or 4.10) are not eligible to apply. Address space distributed from the waitlist will not be eligible for transfer, with the exception of Section 8.2 transfers, for a period of 60 months.

This policy will be applied to all future distributions from the waitlist to include those currently listed.

Multiple requests are not allowed: an organization currently on the waitlist must wait 90 days after receiving a distribution from the waitlist or IPv4 number resources as a recipient of any transfer before applying for additional space. 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 will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

Restrictions apply for entities who have conducted recent resource transfers. These restrictions are specified in Section 8 for each relevant transfer category.



Current NRPM Text

4.1.8. ARIN Waitlist

4.1.8.1. Sequencing

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. Fulfillment

ARIN will fulfill requests on a first-approved basis, subject to the size of each available address block as address blocks become available for distribution. A timely review of the original request may be conducted by ARIN staff. Requests will not be partially filled. Any requests met through a transfer will be considered fulfilled and removed from the waiting list.

4.1.8.3. Qualification

ARIN staff will evaluate all Waitlist requests against the requirements of otherwise applicable Section 4 policies.



NRPM Text – *Proposed Changes*

4.1.8. ARIN Waitlist

ARIN will only issue future IPv4 assignments/allocations (excluding 4.4 and 4.10 space) from the ARIN Waitlist. The maximum size aggregate that an organization may qualify for at any one time is a /22. ~~Organizations will be able to elect a smaller block size than they qualify for down to a /24. Organizations which hold more than a /20 equivalent of IPv4 space in aggregate (exclusive of special use space received under section 4.4 or 4.10) are not eligible to apply.~~

Address space distributed from the waitlist will not be eligible for transfer, with the exception of Section 8.2 transfers, for a period of 60 months. This policy will be applied to all future distributions from the waitlist to include those currently listed.

NRPM Text – *Proposed Changes*

~~Multiple requests are not allowed: an organization currently on the waitlist must wait 90 days after receiving a distribution from the waitlist or IPv4 number resources as a recipient of any transfer before applying for additional space. 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 will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

~~Restrictions apply for entities who have conducted recent resource transfers. These restrictions are specified in Section 8 for each relevant transfer category.~~

Policy Statement – *Proposed Changes* (Sept 30, 2024)

4.1.8. ARIN Waitlist

ARIN will only issue future IPv4 assignments/allocations (excluding 4.4 and 4.10 space) from the ARIN Waitlist. The maximum size aggregate that an organization may qualify for is a **/24**.

Organizations which ever held any IPv4 space other than special use space received under section 4.4 or 4.10 are not eligible to apply.

Address space distributed from the waitlist will not be eligible for transfer, with the exception of Section 8.2 transfers, for a period of 60 months. This policy will be applied to all future distributions from the waitlist to include those currently listed. Qualified requesters will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

Waiting list recipients must demonstrate the need for a /24 on an operating network.

This policy will apply to waitlist requests received following the implementation of this policy. Waitlist requests received prior to the implementation of this policy will not be affected.



Proposed Changes

4.1.8. ARIN Waitlist – Proposed text

ARIN will only issue future IPv4 assignments/allocations (excluding 4.4 and 4.10 space) from the ARIN Waitlist. The maximum size aggregate that an organization may qualify for is a /24.

Organizations which ever held any IPv4 space other than special use space received under section 4.4 or 4.10 are not eligible to apply.

Address space distributed from the waitlist will not be eligible for transfer, with the exception of Section 8.2 transfers, for a period of 60 months. This policy will be applied to all future distributions from the waitlist to include those currently listed. Qualified requesters will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

Waiting list recipients must demonstrate the need for a /24 on an operating network.

This policy will apply to waitlist requests received following the implementation of this policy. Waitlist requests received prior to the implementation of this policy will not be affected.

Draft Policy ARIN-2023-8: Reduce 4.1.8 Maximum Allocation

Action	Date
Proposal	26 October 2023
Draft Policy	21 November 2023
Revised	14 February 2024
Revised	30 September 2024

Historical Feedback

In response to community feedback on the Public Policy Mailing List and during ARIN 53, there was overwhelming support for a protection clause as a condition to supporting the policy, as it was felt that a retroactive implementation may be unfair to those currently on the Waiting List.

Additional text provides consideration and protection to those already on the Waiting List to not be retroactively impacted by the policy once it is implemented.

Historical Feedback

Added text, as was suggested by the Community, to provide a level of protection for existing Waiting List requests:

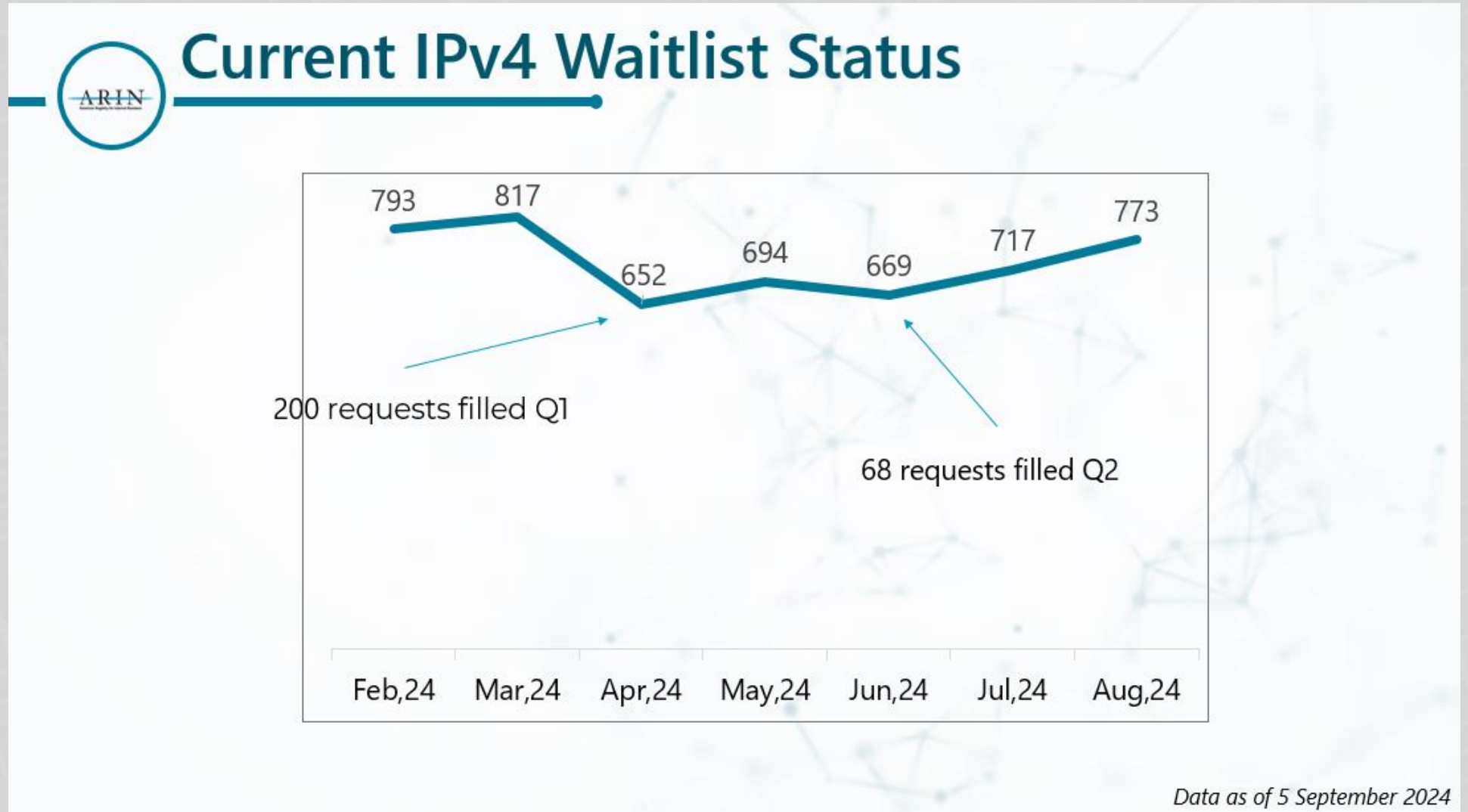
Protection Clause:

- *If policy is adopted with clause, it will ONLY impact new Waitlist entrants.*

Protection Clause - Text Added:

- This policy will apply to waitlist requests received following the implementation of this policy. Waitlist requests received prior to the implementation of this policy will not be affected.

Policy Impact



Policy Impact

Review of "Protection Clause"

"A company joining ARIN's IPv4 Waitlist today should expect to wait at least three years"

"Reducing the IPv4 maximum allocation from a /22 (1,024 addresses) to a /24 (256 addresses) could reduce wait times by almost two-thirds"

- John Sweeting, ARIN CXO - ARIN 52

Waitlist size = 824 (as of 27 September 2024) / 709 (as of 4 October 2024)

Consider the following possibilities:

Do Nothing: There is an approximately 3+ year wait for the existing requests to be completely fulfilled;

Retroactive Protections: Will still require a similar 3-year lead time before the pending requests can be fulfilled, to then move to only satisfying requests for /24s.

No Protections, Immediate Reductions: If reduced to /24 minimum for all requests immediately, there will be a significant reduction in duration of wait times.

Policy Impact

What problem are we trying to solve?

Do Nothing - If this policy is not implemented

- IPv4 Waiting List times will remain at least three years, or continue to increase
- Runout will eventually happen unless organizations return IP addresses or space is returned to ARIN
- The number of transfers and cost of IPs could be impacted

Retroactive Protections - If this policy is implemented (with protection clause)

- The IPv4 Waiting List size would be reduced, but only after a 3-year delay

No Protections, Immediate Reductions - If this policy is implemented (without protection clause)

- The IPv4 Waiting List size would be reduced by two-thirds.

Community Feedback

Proposed additional changes (since 30 September 2024)

Edit for improved grammar:

- Organizations **which that have** ever held any IPv4 space other than special use space received under section 4.4 or 4.10 are not eligible to apply.

Protection Clause Options: Edited for improved grammar

Option A. This policy will apply to waitlist requests received following the implementation of this policy. Waitlist requests received prior to the implementation of this policy will not be affected.

Option B. The limitation to a single /24 will be enforced for waitlist requests submitted after the implementation of this policy. Requests received before the policy change will be evaluated based on the policy in place at the time of the request.



Community Feedback

Proposed additional changes (since 30 September 2024)

Edited for clarity and removal of potential ambiguity to clarify that no exemptions to apply:

- Address space distributed from the waitlist will not be eligible for transfer, with the exception of Section 8.2 transfers, for a period of 60 months.
- This ~~policy~~ **restriction** will be applied to all future distributions from the waitlist to **also** include those **organizations (requesters)** currently listed.
 - *"will not be eligible for transfer, ...for a period of 60 months." is to also apply to those currently on the waitlist, despite the option of the "protection clause" which seeks to not impact their /22 vs /24 requests.*



Community Feedback

Community continues to show (very) strong opinions about this policy

- Reducing the allocation from /22 to /24 will not solve any tangible problem, rather create a new one as /24 is so small even for the smaller organizations that are waiting in order to use it properly to connect people and businesses.
- The proposal may be aiming to reduce anxiety from having to wait too long in the waiting list, but the reality is that there aren't IP addresses left to replenish the pool and has been a fact for a while.
- The wait list is three years long and the justifications are two-year projections. There is a fundamental issue with needs-testing here. Does it matter if the needs-tests are accurate at the time of allocation?
- There is no necessity to revise the policy. **I believe this policy should be abandoned**





Questions for the Community

We are now seeing four feasible options for this Draft Policy:

1. Consider revised policy as written (*with proposed retroactive protections - still 3+ year lag and wait times*);
2. Consider policy without any retroactive protections (*reduction in wait times by two-thirds*);
3. Do away with the Waiting List completely (*new policy would be required*);
4. Abandon the policy (*essentially, do nothing, no changes to current operations*)

Should we keep working on this policy as formulated?