

**Recommended Draft Policy ARIN-2015-3:
Remove 30-day Utilization Requirement in End-User IPv4 Policy**

AC's assessment of conformance with the Principles of Internet Number Resource Policy:

ARIN 2015-3 contributes to fair and impartial number resource administration by removing from the NRPM text that is operationally unrealistic for the reasons discussed in the problem statement. This proposal is technically sound, in that the removal of the text will more closely align with the way staff applies the existing policy in relation to 8.3 transfers. There was strong community support for the policy on PPML and at ARIN 36, which was confirmed at ARIN 37. There was a suggestion to replace this text with an alternate requirement. However, the community consensus was to move forward with the removal alone.

The staff and legal review also suggested removing RFC2050 references and pointed out that 4.2.3.6 has an additional 25% immediate use clause, community feedback was to deal with those issues separately.

Problem Statement:

End-user policy is intended to provide end-users with a one-year supply of IP addresses. Qualification for a one-year supply requires the network operator to utilize at least 25% of the requested addresses within 30 days. This text is unrealistic and should be removed.

First, it often takes longer than 30 days to stage equipment and start actually using the addresses.

Second, growth is often not that regimented; the forecast is to use X addresses over the course of a year, not to use 25% of X within 30 days.

Third, this policy text applies to additional address space requests. It is incompatible with the requirements of other additional address space request justification, which indicates that 80% utilization of existing space is sufficient to justify new space. If a block is at 80%, then often (almost always?) the remaining 80% will be used over the next 30 days and longer. Therefore the operator cannot honestly state they will use 25% of the ADDITIONAL space within 30 days of receiving it; they're still trying to use their older block efficiently.

Fourth, in the face of ARIN exhaustion, some ISPs are starting to not give out /24 (or larger) blocks. So the justification for the 25% rule that previously existed (and in fact, applied for many years) is no longer germane.

Policy statement:

Remove the 25% utilization criteria bullet point from NRPM 4.3.3.
Resulting text:

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 criterion that must be met is a 50% utilization rate within one year. A greater utilization rate may be required based on individual network requirements. Please refer to RFC 2050 for more information on utilization guidelines.

Comments:

- a. Timetable for implementation: Immediate
- b. Anything else

ARIN STAFF ASSESSMENT

Draft Policy ARIN-2015-3: Remove 30-day utilization requirement in end-user IPv4 policy

Date of Assessment: 16 February 2016

1. Summary (Staff Understanding)

This proposal would remove the 25% utilization (within 30 days of issuance) criteria bullet point from NRPM 4.3.3.

2. Comments**A. ARIN Staff Comments**

This policy would more closely align with the way staff applies the existing policy in relation to 8.3 transfers. Because there is no longer an IPv4 free pool and many IPv4 requests are likely to be satisfied by 8.3 transfers, the adoption of this policy should have no major impact on operations and could be implemented as written.

Note that both NRPM 4.3.3 and NRPM 4.2.3.6 contain references to obsolete RFC 2050. Additionally, 4.2.3.6 references the 25% immediate use (within 30 days of issuance) requirement.

Staff suggests removing the first two sentences of 4.2.3.6 to remove the references to RFC 2050 and the 25% requirement. Additionally, staff suggests removing the reference to the obsolete RFC 2050 in section 4.3.3.

B. ARIN General Counsel – Legal Assessment

No material legal risk in this policy.

3. Resource Impact

This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur immediately after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

- * Updated guidelines and internal procedures
- * Staff training

4. Proposal / Draft Policy Text Assessed

Date: 27 January 2016

Problem Statement:

End-user policy is intended to provide end-users with a one year supply of IP addresses. Qualification for a one-year supply requires the network operator to utilize at least 25% of the requested addresses within 30 days. This text is unrealistic and should be removed.

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Comments:

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Earlier version

Draft Policy ARIN-2015-3: Remove 30 day utilization requirement in end-user IPv4 policy

Date: 26 May 2015

Problem Statement:

End-user policy is intended to provide end-users with a one-year supply of IP addresses. Qualification for a one-year supply requires the network operator to utilize at least 25% of the requested addresses within 30 days. This text is unrealistic and should be removed.

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Comments:

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ARIN STAFF ASSESSMENT

Draft Policy ARIN-2015-3: Remove 30-day utilization requirement in end-user IPv4 policy

Date of Assessment: 18 August 2015

1. Summary (Staff Understanding)

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2. Comments

A. ARIN Staff Comments

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