## Draft Policy 2014-14

# Removing Needs Test from Small IPv4 Transfers

#### **Problem Statement**

**Problem Statement:** "ARIN staff, faced with a surge in near-exhaust allocations and subsequent transfer requests and a requirement for team review of these, is spending scarce staff time on needs testing of small transfers. This proposal seeks to decrease overall ARIN processing time through elimination of that needs test."

## Policy Statement, Part 1

"Change the language in NRPM 8.3 after Conditions on the recipient of the transfer: from "The recipient must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA." to "For transfers larger than a /16 equivalent or for recipients who have completed a needs-free transfer in the prior year, the recipient must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA.""

## Policy Statement, Part 2

"Change the language in the third bullet point in NRPM 8.4 after Conditions on the recipient of the transfer: from "Recipients within the ARIN region must demonstrate the need for up to a 24-month supply of IPv4 address space." to "For transfers larger than a /16 equivalent or for recipients who have completed a needs-free transfer in the prior year, recipients in the ARIN region must demonstrate the need for up to a 24month supply of IP address resources under current ARIN policies and sign an RSA.""

#### Discussion

Needs testing has been maintained for transfers largely because the community wishes to ensure protection against hoarding and speculation in the IPv4 market. This proposal seeks a middle ground between the elimination of needs tests for transfers altogether, and the continuance of needs tests for every transfer. This should help ARIN staff to reduce transfer processing time, since most transfers have been smaller than /16.

#### More Discussion

Staff and legal review excerpt-

"Counsel believes that 2014-14 presents significantly less legal concern than 2014-20. Policy 2014-14 creates greater efficiency by removing a showing of need, and allowing a transfer of a /16 or smaller bloc. Exceptions to needs based review can be justified because the smaller size of the blocs does not provide a significant vehicle to game, hoard, or speculate sizable IP resource blocks of size. The exception would address approximately 85% of 8.3 transfers, and thus be efficient for administration."

#### Where We Are

3 Criteria Need to be Met

Enabling Fair and Impartial Number Resource Administration

**Technically Sound** 

Supported by the Community

The argument can be made that these are met. Therefore, I intend to move to advance this DP to Recommended Draft Policy. Tell me why not.

### Comments

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