



# Draft Policy 2015-6 Transfers & Multi-National Networks

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# Problem Statement



Some organizations within the ARIN region are currently unable to receive IPv4 space via transfer based on current ARIN policy, which prohibits address space used outside of the ARIN region from being considered efficiently utilized. This proposal would allow organizations with a strong and long-standing presence in the ARIN region to be able to receive number resources via transfer for their global operations.

# Policy Statement



When evaluating transfer requests, ARIN will not consider the geographic location where an organization is utilizing, or will utilize, its ARIN-registered addresses if that organization, its parent, or a subsidiary:

- 1. has been an ARIN customer for at least 36 months; AND
- 2. is currently in good standing with ARIN; AND
- 3. is currently using IPv4 or IPv6 addresses in the ARIN region; AND
- 4. can demonstrate it has a meaningful business that operates in the ARIN region.

# Staff and Legal



## A. ARIN Staff Comments

- During the course of a transfer request, staff will consider and review the utilization of any block issued by ARIN to that organization, regardless of whether that address space is being used outside of the ARIN region.
- This policy enables organizations to qualify as a recipient for 8.3 or 8.4 transfers in the ARIN region when they might not have otherwise been able to do so. ARIN staff would now be able to consider their global utilization, instead of only their in-ARIN region use.
- One of the elements ARIN staff uses to determine 24-month need for an organization is their historical utilization rate. This proposal allows organizations to justify a larger 24-month needs based qualification, because staff will consider their utilization globally instead of just what was used inside the ARIN region.
- This would be placed in a new section of the NRPM called "8.5 Additional Transfer Policies".
- This policy could be implemented as written.

# Staff and Legal (cont'd)



## 3. Resource Impact

- From a request review standpoint, implementation of this policy would have minimal resource impact. However, it could have future staffing implications based on the amount of additional work the policy could present. It is estimated that implementation could 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
- Implementation of this policy may allow for registrations in the ARIN database that require unicode character sets. From an engineering standpoint, implementation of this policy could have a major resource impact. It is estimated that implementation would occur within 12 months, instead of the 3 months cited above, after ratification by the ARIN Board of Trustees if ARIN is required to support unicode character sets. The following would be needed in order to implement:
  - \* Engineering: Engineering efforts to handle out of region business rules may be substantial as our system only supports ascii now. If there is a need for unicode character sets, then there is a substantial amount of work required to upgrade the DB and applications to support unicode. Additionally, we would need to discuss how to display unicode characters in port 43 whois.

# Sheppard request to Staff



A follow-up request was sent to Staff last week in regards to multi-national organizations within the ARIN region who use space out of the region and the size of the organizations that have or could be impacted.

## Large Provider

Existing practice allows organizations to use a portion of their IPv4 resources received from ARIN outside the ARIN region only if the shortest aggregate prefix is being announced from one of their ARIN region facilities. Some large organizations do this regularly and do not necessarily require these new policies to continue their current operations, however it could simplify the needs-assessment process for them at ARIN.

## Small Provider

Smaller organizations do not often enjoy the robust global network of the larger providers and are less likely to be able to announce a single large aggregate for their global operations from inside the ARIN region alone. They more often have autonomous sites around the globe and would not be able to demonstrate to ARIN their largest aggregate prefix is announced from within the ARIN region. These new policies would likely provide relief to the smaller organizations and allow them to achieve larger approvals in their needs-assessment with ARIN.

# Discussion



- Do you support the policy as written?
- Does the criteria provide an appropriate balance?
- Is Unicode support required for this policy?
- Is this policy complementary to ARIN-2015-5 Out of Region Use?