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- Eliminating Needs-based Evaluation for Section 8.2, 8.3, and 8.4 transfers of IPv4 Netblocks
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Disclaimer

- This draft proposal has not received a review by ARIN staff and legal.
- Text provided for review as presented in your discussion guide is as submitted by the proposal originator.

Problem Statement (simplified)



- Due to the “needs-basis” requirement in NRPM sections 8.2, 8.3, and 8.4, ARIN staff refuse to complete database updates which would reflect an accurate transfer of control / utilization of netblocks in two cases:
 - where ARIN doesn't agree that the recipient organization has need; or
 - where the recipient organization bypasses the ARIN registry entirely in order to secure the needed IPv4 netblocks in a more timely fashion
- The NRPM 8.1 introduction section includes a perceived "threat" of reclamation which serves as a hindrance to resource holders approaching ARIN with database updates when transferring resources.
- The result is that the data visible in ARIN registry continues to become more inaccurate over time.

Rationale



- IPv4 Free Pool is exhausted in 4 of the 5 RIRs, forcing transfers of resources instead.
- Thusly, an RIR's primary responsibility vis-à-vis IPv4 netblock governance has shifted from “allocation” to “documentation” and “ensuring registry accuracy.”
- The RIPE registry, as an example, provides for intra-RIR IPv4 transfers upon satisfying the following requirements:
 - Valid RIR membership
 - Valid authority to transfer
 - Validation of the authenticity of the parties requesting a transfer.

Policy Statement



- This proposal eliminates all needs-based evaluation for the respective transfer type, and allow transfers to be reflected in the database as they occur

Section 8.1 Principles



- Strike the 3rd paragraph which begins with "Number resources are issued, based on justified need, to organizations. . ." since it mostly reiterates other sections of ARIN policy.
 - All transfers are subjected to those policies, as called out in 8.2, 8.3, 8.4.
 - Additionally, removing this paragraph removes the perceived "threat" of reclaim which serves as a hindrance to long-term resource holders approaching ARIN with database updates, since in practice ARIN has not been forcibly reclaiming IP resources assigned to "failed businesses."

Section 8.1



Text removed:

- Number resources are issued, based on justified need, to organizations, not to individuals representing those organizations. Thus, if a company goes out of business, regardless of the reason, the point of contact (POC) listed for the number resource does not have the authority to sell, transfer, assign, or give the number resource to any other person or organization. The POC must notify ARIN if a business fails so the assigned number resources can be returned to the available pool of number resources if a transfer is not requested and justified.



Section 8.2

Mergers and Acquisitions

1. Change the 4th bullet from:

"The resources to be transferred will be subject to ARIN policies."

to:

"The resources to be transferred will be subject to ARIN policies, excluding any policies related to needs-based justification or inspection of current or future utilization rate."

2. Remove entirely the last paragraph which reads:

"In the event that number resources of the combined organizations are no longer justified under ARIN policy at the time ARIN becomes aware of the transaction, through a transfer request or otherwise, ARIN will work with the resource holder(s) to return or transfer resources as needed to restore compliance via the processes outlined in current ARIN policy."

Result of Section 8.2 Edits



- ARIN will consider requests for the transfer of number resources in the case of mergers, acquisitions, and reorganizations under the following conditions:
 - The new entity must provide evidence that they have acquired assets that use the resources to be transferred from the current registrant. ARIN will maintain an up-to-date list of acceptable types of documentation.
 - The current registrant must not be involved in any dispute as to the status of the resources to be transferred.
 - The new entity must sign an RSA covering all resources to be transferred.
 - The resources to be transferred will be subject to ARIN policies, excluding any policies related to needs-based justification or inspection of current or future utilization rate.
 - The minimum transfer size is the smaller of the original allocation size or the applicable minimum allocation size in current policy.

8.3. Transfers between Specified Recipients within the ARIN Region



1. Change the first bullet under "Conditions on 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:

"The recipient must sign an RSA."

2. Change the 2nd bullet under "Conditions on recipient of the transfer" from:

"The resources to be transferred will be subject to ARIN policies."

to:

"The resources to be transferred will be subject to ARIN policies, excluding any policies related to needs-based justification or inspection of current or future utilization rate."

Result of Section 8.3 Edits



- In addition to transfers under section 8.2, IPv4 numbers resources and ASNs may be transferred according to the following conditions.
- Conditions on source of the transfer:
 - The source entity must be the current registered holder of the IPv4 address resources, and not be involved in any dispute as to the status of those resources.
 - The source entity will be ineligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.
 - The source entity must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN for the 12 months prior to the approval of a transfer request. This restriction does not include M&A transfers.
 - The minimum transfer size is a /24
- Conditions on recipient of the transfer:
 - 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.
 - The resources transferred will be subject to current ARIN policies, excluding any policies related to needs-based justification or inspection of current or future utilization rate.

8.4. Inter-RIR Transfers to Specified Recipients



1. Change the introductory language from:

"Inter-regional transfers may take place only via RIRs who agree to the transfer and share reciprocal, compatible, needs-based policies."

to:

"Inter-regional transfers may take place only via RIRs who agree to the transfer and share reciprocal, compatible, policies."

2. Change the 2nd bullet under "Conditions on recipient of the transfer" from:

"Recipients within the ARIN region will be subject to current ARIN policies and sign an RSA for the resources being received."

to:

"Recipients within the ARIN region will be subject to current ARIN policies, excluding any policies related to needs-based justification or inspection of current or future utilization rate, and sign an RSA for the resources being received."

3. Remove entirely the 3rd bullet under "Conditions on recipient of the transfer" which reads "Recipients within the ARIN region must demonstrate the need for up to a 24-month supply of IPv4 address space."

Results of 8.4 Edits



- Inter-regional transfers may take place only via RIRs who agree to the transfer and share reciprocal, compatible, ~~needs-based~~ policies.
- Conditions on source of the transfer:
 - The source entity must be the current rights holder of the IPv4 address resources recognized by the RIR responsible for the resources, and not be involved in any dispute as to the status of those resources.
 - Source entities outside of the ARIN region must meet any requirements defined by the RIR where the source entity holds the registration.
 - Source entities within the ARIN region will not be eligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.
 - Source entities within the ARIN region must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN for the 12 months prior to the approval of a transfer request. This restriction does not include M&A transfers.
 - The minimum transfer size is a /24.
- Conditions on recipient of the transfer:
 - The conditions on a recipient outside of the ARIN region will be defined by the policies of the receiving RIR.
 - Recipients within the ARIN region will be subject to current ARIN policies, excluding any policies related to needs-based justification or inspection of current or future utilization rate, and sign an RSA for the resources being received.
 - The minimum transfer size is a /24.

PPML Discussion



- 56 messages between 9/24 and 9/28
- 2 in support, 4 against
- A lot of community concern with regard to eliminating “needs-based” criteria

Discussion



- Do you support removing needs-based requirements for IPv4 transfers?
- For those generally in support of this effort, are there any refinements to the changes made which you think will improve this should these policy changes be implemented?
- For those generally opposed to this effort, are there any adjustments to the policy changes which, if implemented, would gain your support?
- Is there an alternate proposal that better addresses both the problem statement as well as community concerns?

Discussion

