



# Draft Policy ARIN 2015-7

Simplified requirements for demonstrated need for IPv4 transfers

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# Problem Statement



ARIN transfer policy currently inherits all its demonstrated need requirements for IPv4 transfers from NRPM sections 4.

# Problem Statement (cont'd)



Because that section was written primarily to deal with free pool allocations, it is much more complicated than is really necessary for transfers.

In practice, ARIN staff applies much more lenient needs assessment to section 8 IPv4 transfer requests than to free pool requests, as 24-month needs are much more difficult to assess to the same level of detail.

# Problem Statement (cont'd)



This proposal seeks to dramatically simplify the needs assessment process for 8.3 transfers, while still allowing organizations with corner-case requirements to apply under existing policy if necessary.

# Policy Statement (cont'd)



8.1.x Simplified requirements for demonstrated need for IPv4 transfers. IPv4 transfer recipients must demonstrate (and an officer of the requesting organization must attest) that they will use at least 50% of their aggregate IPv4 addresses (including the requested resources) on an operational network within 24 months.

Organizations that do not meet the simplified criteria above may instead demonstrate the need for number resources using the criteria in section 4 of the NRPM.

# Staff and Legal



- Staff would apply this policy language to 24-month needs assessments for 8.3 transfers, 8.4 transfers, and pre-approval requests.
- In order for staff to verify the demonstrated need of 50% of the total aggregate of IPv4 address space holdings by an organization, the policy criteria in NRPM Section 4 would continue to be utilized.

# Staff and Legal (cont'd)



- This policy would allow organizations to potentially qualify for a larger amount of IPv4 address space than they can under existing policy.
- This policy could be implemented as written.
- The proposal indicates placement as “8.1.x”. Staff would add the proposed policy language as sub-bullets to recipient need sections of both NRPM 8.3 and NRPM 8.3, specifically 8.3 bullet 5 and 8.4 bullet 8

# Legal Assessment



- No material legal issue exists if the policy is adopted.



# Counsel's Comment



This policy if adopted would significantly lower the degree of utilization required and permit significantly larger transfers of resources than existing policy. This is in effect a bridge between maintaining a 'lighter' needs based structure, that permits substantially greater transfers.

# Counsel's Comment (cont'd)



An issue that does not have to be resolved before the policy is voted upon, but may be of importance to address is ARIN making clear whether an acquiring party taking appropriate advantage of such a policy change ought to have a corollary duty to fully disclose to ARIN whether they have use of any other number resources (by agreement) that effectively reduce their overall number resource needs.

# Discussion



- Do you support this policy as written?
- Suggestion for addition of *duty to disclose* other number resources.