



Recommended Draft Policy ARIN-2016-9: Streamline Merger & Acquisition Transfers

Staff Introduction

History

- Proposed in December 2016 (ARIN-prop-234)
- AC Shepherds: John Springer, Leif Sawyer
- Has not been presented at a Public Policy Meeting or Public Policy Consultation (PPM or PPC)
- Advanced to Recommended Draft Policy Status:
 - **March 2017**
- Text in Discussion Guide and at:
 - **https://www.arin.net/policy/proposals/2016_9.html**

Staff and Legal Review (January 2017)

- Staff Understanding:
 - **Draft Policy 2016-9 allows for organizations to submit an 8.2 Merger & Acquisition specified transfer without the expectation that any of the resources will be revoked due to lack of justification for the resources continued use. This draft policy eliminates any wording that might suggest that resources may have to be divested by the organization seeking to update their information through the 8.2 specified transfer process.**

Staff and Legal Review (continued)

- Staff Comments:
 - If the intent of this policy is to ensure that the Internet number resources involved in the 8.2 transfer will not be subject to a "needs based" assessment then staff suggests that be made plain in the policy text
 - Could result in a "higher bar" for approval of transfers if "independently verifiable" evidence is the only documentation that can be used to verify that organizations have sold a portion of their network
 - Staff suggests that the first sentence of the Problem Statement would be more accurate if changed to "In some 8.2 transfer situations, the current policy might have an unexpected and unwanted side effect of not encouraging organizations to update registration data"

NOTE: Policy text has since been updated to address these comments

Staff and Legal Review (continued)

- Legal Assessment:
 - **Does not create material legal issues, presuming staff comments as outlined in this assessment are addressed.**

Staff and Legal Review (continued)

- Resource Impact:
 - **Implementation of this policy would have minimal resource impact. It is estimated that implementation would 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**

Presentation by the AC