

# ARIN 43

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## Discussion Guide



# Welcome to ARIN 43!



Policies in the ARIN region are developed by the Internet community using the open and transparent ARIN Policy Development Process (PDP). The Internet community develops policies via discussion on the ARIN Public Policy Mailing List (PPML) and at ARIN Public Policy Consultations (PPCs) and ARIN Public Policy and Members Meetings. Anyone may participate in the process – ARIN membership is not required.

The ARIN Board of Trustees adopts Recommended Draft Policies forwarded by the ARIN Advisory Council if the Board determines that the PDP has been followed, that support and consensus for policies has been reached among the community, and if the Draft Policies are consistent with ARIN's Articles of Incorporation, Bylaws, and with the applicable laws and regulations.

The ARIN Public Policy and Members Meeting is conducted in an orderly manner to understand the sense of the majority, to respect the views of the minority, and to protect the interests of those absent. Accordingly, the flow of the meeting is structured according to a published agenda and participants are expected to follow Meeting Courtesies, Expected Standards of Behavior, and Rules of Discussion.

# What's Inside

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## For Discussion

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This document contains the Draft and Recommended Draft Policies on the agenda for this Public Policy and Members Meeting.

Draft Policies are works in progress and are included in this document to assist with discussion. This text is subject to change, and the most up-to-date text is always available on the ARIN website at: <https://www.arin.net/participate/policy/drafts/>

Included at the end of this document are copies of ARIN's Policy Development Process (PDP) and Number Resource Policy Manual (NRPM).

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# ARIN Participants Expected Standards of Behavior

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Those who take part in any ARIN meeting, conference or event including but not limited to Public Policy and Member Meetings, ARIN on the Road, ARIN In the Caribbean, etc., and related activities (including but not limited to ARIN staff, members of the Board of Trustees, Advisory Council (AC), Number Resource Organization Number Council (NRO NC), and ARIN meeting attendees) must:

- Treat each other with civility, courtesy and respect (both face-to-face and online), regardless of the sex, race, color, national origin, marital status, age, religion, disability, sexual orientation, occupation, line of business, or policy position of other participants.
- Make reasonable and informed comments when participating in policy development and decision-making discussions and processes.
- Listen respectfully to the views of all stakeholders when considering policy issues.
- Those who take part in the ARIN Policy Development Process must take responsibility for the success of the model by trying to build consensus with other participants and find solutions to issues.
- Act fairly and in good faith with other participants in the ARIN process.
- Act in accordance with ARIN's Policy Development Process when participating in ARIN public policy events. The ARIN model is based on a bottom-up, consensus-driven approach to policy development.

Further, those who participate in ARIN events and related activities must foster an environment that is free from any form of discrimination and conduct that is harassing, coercive, or disruptive. ARIN prohibits harassment in any form – verbal, physical or visual – and will not tolerate discriminatory harassment or inappropriate conduct of a harassing nature directed against any individual on the basis of gender, race, creed, color, national origin, nationality, ancestry, marital status, age, religion, disability, sexual orientation, gender identity, or any other legally protected characteristic.

Sexual harassment is a form of gender discrimination that is unlawful and violates this policy. For purposes of this policy, sexual harassment is defined generally to include unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when such conduct is made a condition of an individual's employment or participation, used as the basis for decisions, or has the effect of substantially interfering with an individual's performance or creating a hostile environment. Sexually harassing conduct, as well as inappropriate conduct of a harassing nature, is prohibited. Examples of prohibited conduct include, but are not limited to: (1) sexually-oriented kidding, teasing, gestures or jokes; (2) offensive or unwelcome sexual flirtations, advances, or propositions; (3) verbal abuse of a sexual nature; (4) graphic or verbal comments, epithets, or slurs about an individual's body; (5) sexually degrading words used to describe an individual; (6) the display or transmission (e.g., e-mail, text or social media) of sexually suggestive or sexually explicit materials (such as magazines, videos, pictures, cartoons or posters); (7) inquiries into another individual's sexual experiences and activities or discussion of one's own sexual experiences and activities; and (8) unwelcome intentional touching of another person or other unwanted intentional physical conduct.

ARIN is committed to supporting a productive and safe environment for all participants at ARIN events. Any ARIN participant who believes there has been a violation of this policy should either promptly bring the incidents to the attention of the person chairing the teleconference or meeting, or report them via the ARIN Mailing List Acceptable Use Policy if the incident occurs on an ARIN mailing list. Participants may alternatively report suspected violations to ARIN's General Counsel, Stephen M. Ryan ([sryan@mwe.com](mailto:sryan@mwe.com)).

# Rules of Discussion

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The Chair moderates discussions of formal draft policies so that all can speak and all can be heard. Accordingly, every person who participates in a Public Policy Consultation is asked to follow these simple rules and customs:

1. All persons have equal rights, privileges, and obligations.
2. Full and free discussion of all draft policies is the right of every person participating in the meeting.
3. Only one policy is considered at a time.
4. Persons should not speak in the discussion until they have moved to a designated speaker's position and have been recognized by the Chair and granted the floor.
5. Every time a speaker is recognized by the Moderator, speakers should do the following:
  - a. State their name.
  - b. State intent to support or not support the policy under discussion.
6. No person should speak a second time on the same topic if anyone who has not spoken on that topic wishes to do so.
7. No person should speak for more than three minutes unless the Moderator gives consent.
8. Speakers should direct all remarks to the Moderator. They should not debate with other speakers or otherwise attack or question the motives of other speakers.
9. While the discussion is in progress, speakers may suggest amendments or other secondary proposals to the Moderator, who will see them acted on accordingly.
10. Only the Moderator may call for a poll to gain a sense of the participants regarding the policy under discussion, any part of that policy, any proposed amendment to that policy, or any secondary proposal. The Chair will state all questions before polling responses mean.

# Recommended Draft Policy ARIN-2017-12

## POC Notification and Validation Upon Reassignment or Reallocation

**AC Shepherds:** Chris Tacit, David Farmer | **Latest Version:** 7 March 2019

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### **Problem Statement:**

Some ISPs assign individuals to be POCs for reassigned blocks without consultation of the individual they are inserting into Whois. For example, during the reassignment/reallocation process, some large ISPs automatically create POCs from their customer's order form. This process is automated for many ISPs and therefore the resulting POCs are not validated prior to being created in the ARIN Whois database. This creates unknowing POCs that have no idea what Whois is or even who ARIN is at the time they receive the annual POC validation email. It can also create multiple POCs per email address causing that same person to receive a multitude of POC Validation emails each year.

This policy proposal seeks to prevent the situation where a POC is unwittingly and unintentionally inserted into Whois. Doing so will reduce the significant amount of time that ARIN staff spend fielding phone calls from POCs who have no idea they are in Whois.

The proposal will improve the overall POC validation situation, by ensuring that all reallocation or detailed reassignment requests are related to a pre-existing receiving organization with at least one valid POC object, and by requesting that any other existing invalid POC objects are validated.

### **Policy statement:**

Insert one new section into NRPM 3:

#### 3.7 POC Notification and Validation Upon Reassignment or Reallocation

When a request for reallocation or detailed reassignment is made to ARIN, the receiving organization must already be in the ARIN database and associated with at least one validated POC object. If there are no validated POC objects associated with the receiving organization, ARIN shall reject the request.

In addition to notifying the requester, ARIN will also notify, via email, all POCs associated with the receiving organization, whether the request was successful or not, and will request validation of any invalid POC objects associated with the receiving organization.

Note: Simple reassignments are made without any linkage to an organization or POC objects in the ARIN database.

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Earlier version

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Version Date: 26 February 2019

Problem Statement:

Some ISPs assign individuals to be POCs for reassigned blocks without consultation of the individual they are inserting into Whois. For example, during the reassignment/reallocation process, some large ISPs automatically create POCs from their customer's order form. This process is automated for many ISPs and therefore the resulting POCs are not validated prior to being created in the ARIN Whois database. This creates unknowing POCs that have no idea what Whois is or even who ARIN is at the time they receive the annual POC validation email. It can also create multiple POCs per email address causing that same person to receive a multitude of POC Validation emails each year.

This policy proposal seeks to prevent the situation where a POC is unwittingly and unintentionally inserted into Whois. Doing so will reduce the significant amount of time that ARIN staff spend fielding phone calls from POCs who have no idea they are in Whois.

The proposal will improve the overall POC validation situation, by ensuring that all reallocation or detailed reassignment requests are related to a pre-existing receiving organization with at least one valid POC object, and by requesting that any other existing invalid POC objects are validated.

Policy statement:

Insert one new section into NRPM 3:

3.7 POC Notification and Validation Upon Reassignment or Reallocation

When a request for reallocation or detailed reassignment is made to ARIN, the receiving organization must already be in the ARIN database and linked to at least one valid POC object. If there is no valid POC object associated with the receiving organization, ARIN shall reject the request.

In addition to notifying the requester, ARIN will also notify, via email, all POCs associated with the receiving organization, whether the request was successful or not, and will request validation of any invalid POC objects associated with the receiving organization.

Note: Simple reassignments are made without any linkage to an organization or POC objects in the ARIN database.

Timetable for implementation: Immediate

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ARIN STAFF & LEGAL ASSESSMENT  
Draft Policy ARIN-2017-12  
Require New POC Validation Upon Reassignment

Date of Assessment: 28 February 2019

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Summary (Staff Understanding)

Draft Policy 2017-12 NRPM section 3.7 requires that all requests for reallocation or detailed reassignment can only be made to existing organizations in the ARIN database with at least one validated POC object. This is a

large change to the way we currently do business. There are several customers that have automated their reallocation/reassignment process with ARIN following the current model. These changes will add some complexity and possibly additional states to automated systems interacting with ARIN for the reallocation/detailed reassignment process. These changes will require customers requesting reallocation or detailed reassignments to gather and verify information from their customers prior to submitting their requests. These changes will provide a higher degree of privacy protection to the organizations that are having reallocations/detailed reassignments submitted on their behalf. ARIN would be required to notify all POCs requiring validation through email notification whether the request is successful or not.

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## Comments

### A. ARIN Staff Comments

- It is recommended that the two instances of “valid POC object” in the first paragraph of section 3.7 be changed to “validated POC object”.
- Overall these changes will result in more accurate information in the ARIN Whois database.
- Draft Policy NRPM section 3.7 would not have a direct effect on RSD operations as far as processing the requests for reallocations and detailed reassignments due to the fact that they are automated; however, initially there could be an increase in customer support calls and tickets.
- The development effort for these changes is estimated to take 8 weeks.
- This policy could be implemented as written.

### B. ARIN General Counsel – Legal Assessment

- No material legal risk in this policy
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## Resource Impact

Implementation of this policy would have a large resource impact. It is estimated that it would take about 8 weeks of development work and there will need to be extensive testing performed with the community as well. It is estimated that this policy could be implemented approximately 6 months after ratification by the ARIN Board of Trustees.

- Updated guidelines and internal procedures
  - Updated documentation on website
  - Staff training
  - Extensive engineering work will be required
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## Proposal/Draft Policy Text Assessed



Latest Version: 26 February 2019

Problem Statement:

Some ISPs assign individuals to be POCs for reassigned blocks without consultation of the individual they are inserting into Whois. For example, during the reassignment/reallocation process, some large ISPs automatically create POCs from their customer's order form. This process is automated for many ISPs and therefore the resulting POCs are not validated prior to being created in the ARIN Whois database. This creates unknowing POCs that have no idea what Whois is or even who ARIN is at the time they receive the annual POC validation email. It can also create multiple POCs per email address causing that same person to receive a multitude of POC Validation emails each year.

This policy proposal seeks to prevent the situation where a POC is unwittingly and unintentionally inserted into Whois. Doing so will reduce the significant amount of time that ARIN staff spend fielding phone calls from POCs who have no idea they are in Whois.

The proposal will improve the overall POC validation situation, by ensuring that all reallocation or detailed reassignment requests are related to a pre-existing receiving organization with at least one valid POC object, and by requesting that any other existing invalid POC objects are validated.

Policy statement:

Insert one new section into NRPM 3:

### 3.7 POC Notification and Validation Upon Reassignment or Reallocation

When a request for reallocation or detailed reassignment is made to ARIN, the receiving organization must already be in the ARIN database and linked to at least one valid POC object. If there is no valid POC object associated with the receiving organization, ARIN shall reject the request.

In addition to notifying the requester, ARIN will also notify, via email, all POCs associated with the receiving organization, whether the request was successful or not, and will request validation of any invalid POC objects associated with the receiving organization.

Note: Simple reassignments are made without any linkage to an organization or POC objects in the ARIN database.

Comments:

Timetable for implementation: Immediate

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Earlier version

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Version Date: 12 March 2018

AC Assessment of Conformance with the Principles of Internet Number Resource Policy:

Recommended Draft Policy ARIN 2017-12 contributes to fair and impartial number resources administration by making it easier for ARIN to contact the correct individuals who perform the POC functions for reassigned

resources, in conjunction with ARIN's administration of those resources. It is technically sound in that it ensures that the correct POCs for reassigned numbering resources are associated with those resources. There is significant community support for this recommended draft policy as written.

Problem Statement:

Some large ISPs assign individuals to be POCs for reassigned blocks without consultation of the individual they are inserting into Whois. For example, during the reassignment/reallocation process, some large ISPs automatically create POCs from their customer's order form. This process is automated for many ISPs and therefore the resulting POCs are not validated prior to being created in the ARIN Whois database. This creates unknowing POCs that have no idea what Whois is or even who ARIN is at the time they receive the annual POC validation email. It can also create multiple POCs per email address causing that same person to receive a multitude of POC Validation emails each year.

This policy proposal seeks to improve the situation where a POC is unwittingly and unintentionally inserted into Whois.

It also seeks to mitigate the significant amount of time that ARIN staff reports that they spend fielding phone calls from POCs who have no idea they are in Whois.

Finally, it is hopeful that this proposal will improve the overall POC validation situation, by forcing ISPs and customers to work together to insert proper information into Whois at the time of sub-delegation.

Policy statement:

Insert one new section into NRPM 3:

3.7 New POC Validation Upon Reassignment

When an ISP submits a valid reallocation or detailed reassignment request to ARIN which would result in a new POC object being created, ARIN must (before otherwise approving the request) contact the new POC by email for validation. ARIN's notification will, at a minimum, notify the POC of:

- the information about the organization submitting the record; and
- the resource(s) to which the POC is being attached; and
- the organization(s) to which the POC is being attached.

If the POC validates the request, the request shall be accepted by ARIN and the new objects inserted into Whois. If the POC does not validate the request within 10 days, ARIN must reject the request.

Timetable for implementation: Immediate

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Earlier version

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Version Date: 21 November 2017

Problem Statement:

Some large ISPs assign individuals to be POCs for reassigned blocks without consultation of the individual they are inserting into Whois. One year later, the POC is contacted by ARIN as part of Annual POC Validation policies. The POC often does not know who ARIN is, what Whois is, and why they are in Whois.

This policy proposal seeks to improve the situation where a POC is unwittingly and unwantingly inserted into Whois.

It also seeks to mitigate the significant amount of time that ARIN staff reports that they spend fielding phone calls from POCs who have no idea they are in Whois.

Finally, it is hopeful that this proposal will improve the overall POC validation situation, by forcing ISPs and customers to work together to insert proper information into Whois at the time of sub-delegation.

Policy statement:

Insert two new sections into NRPM 3:

### 3.7 New POC Validation Upon Reassignment

When an ISP submits a valid reallocation or detailed reassignment request to ARIN which would result in a new POC object being created, ARIN must (before otherwise approving the request) contact the new POC by email for validation. ARIN's notification will, at a minimum, notify the POC of:

- the information about the organization submitting the record; and
  - the resource(s) to which the POC is being attached; and
  - the organization(s) to which the POC is being attached.

If the POC validates the request, the request shall be accepted by ARIN and the new objects inserted into Whois. If the POC does not validate the request within 10 days, ARIN must reject the request.

### 3.8 Downstream Validation of Simple Reassignments

When an ISP submits a valid simple reassignment request to ARIN with an organization name OR postal address that is identical to one or more existing OrgIDs, ARIN will notify the downstream organization and obtain guidance on whether to accept the simple reassignment, or redirect it to one of the existing OrgIDs as a detailed reassignment.

Timetable for implementation: Immediate

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ARIN STAFF & LEGAL ASSESSMENT

Draft Policy ARIN-2017-12

Require New POC Validation Upon Reassignment

Date of Assessment: 2 February 2018

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Summary (Staff Understanding)

Draft Policy 2017-12 NRPM section 3.7 requires that all requests for reallocation or detailed reassignment that will result in the creation of a new POC object be validated by ARIN prior to approving the request. Validation will be accomplished by contacting the new POC by email. If the contacted POC fails to validate within 10 days ARIN will reject the request. This is a very big change to current business processes. In addition, Section 3.8 in the Draft Policy requires staff to notify an organization in a simple reassignment if either the organization name or address is identical to an existing OrgID for the purpose of obtaining guidance as to approve the simple reassignment or redirect it to an existing OrgID as a detailed reassignment.

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## Comments

### A. ARIN Staff Comments

\* The problem statement is vague as to the actual reassignment process which creates the problem. Recommend additional wording that more accurately describes how a POC is created during the reassignment process. Example language could be something like: During the reassignment/reallocation process, some large ISPs automatically create POCs from their customer's order form. This process is automated for many ISPs and therefore the resulting POCs are not validated prior to being created in the ARIN Whois database. This creates unknowing POCs that have no idea what Whois is or even who ARIN is at the time they receive the annual POC validation email. It can also create multiple POCs per email address causing that same person to receive a multitude of POC Validation emails each year.

\* The proposed NRPM 3.7 policy text represents a very significant change to current operations. The largest impact would be on the ARIN Engineering department. This is a major engineering effort and will involve significant testing with the community using this new model. This work has been estimated to take at least 6 months for the planning and development work which does not include the testing and interaction with the community. When the work is completed, there will have to be a period of time where ISP's will have to retool their applications that interface with ARIN before this new system is to be placed into production. At the point this is put into production, all current systems developed by ARIN customers will have to be updated in order to continue working with the new states introduced by this policy.

\* Draft Policy NRPM section 3.7 would not have a direct effect on RSD operations as far as processing the requests for reallocations and detailed reassignments due to the fact that they are automated; however, there would be a significant increase in customer support calls and tickets. A conservative estimate would suggest that at least 50% of these requests would require some type of manual follow up from/with the person receiving the validation email. This increase in interaction with organizations that do not have a direct relationship with ARIN could result in the need for additional staffing within RSD.

\* One possible improvement in business processes regarding the NRPM section 3.7 proposed policy text would be if the policy text specified that the Org's Abuse contact would be put on the reallocation or detailed reassignment record and then the request approved. ARIN would issue notification to the proposed new contact and if the new contact validated, the new validated contact record would replace the abuse contact on the reallocation or reassignment.

\* This change would result in reducing the number of POCs associated with a single email which would reduce the number of POC validation requests each email receives annually. Today there are several emails that have multiple POCs associated. Here are the numbers from our database:

Total email addresses 465,529

Email with 5-9 POCs 15,721

Email with 10-24 POCs 4,638

Email with >25 POCs 1,261

\* It is worth noting that if Draft Policy 2017-03 is adopted which eliminates the requirement for annual POC validation for detailed reassignments that approximately 77% of the current POC validation load is eliminated:

Networks in Whois requiring POC validation:

Direct Allocation 23,665 (04%)

Direct Assignment 35,755 (05%)

Reallocation 89,612 (14%)

Detailed Reassignments 511,637 (77%)

\* The wording in Draft Policy NRPM section 3.8 is misleading because a simple reassignment results in a customer identifier versus an OrgID. There is no contact information contained in a simple reassignment other than street address that could be used for notification, and thus it does not appear that the proposed NRPM 3.8 policy text is implementable. Note also that even if notification were possible, the "OR postal address" in this section may also cause significant problems for some companies as many companies have the same name associated with many different locations and there are several locations that have many companies registered there.

\* This policy could not be implemented as written, but could be implemented with significant effort if the proposed NRPM 3.8 section was removed.

B. ARIN General Counsel – Legal Assessment

\* No material legal risk in this policy

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Resource Impact

Implementation of this policy would have extreme resource impact. It is estimated that it would take over 6 ½ months of development work. There will need to be extensive testing performed with the community as well.

\* Updated guidelines and internal procedures

\* Staff training

\* Extensive engineering work will be required

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Proposal/Draft Policy Text Assessed

Draft Policy 2017-12: Require New POC Validation Upon Reassignment

Version Date: 21 November 2017

## Problem Statement:

Some large ISPs assign individuals to be POCs for reassigned blocks without consultation of the individual they are inserting into Whois. One year later, the POC is contacted by ARIN as part of Annual POC Validation policies. The POC often does not know who ARIN is, what Whois is, and why they are in Whois.

This policy proposal seeks to improve the situation where a POC is unwittingly and unwantingly inserted into Whois.

It also seeks to mitigate the significant amount of time that ARIN staff reports that they spend fielding phone calls from POCs who have no idea they are in Whois.

Finally, it is hopeful that this proposal will improve the overall POC validation situation, by forcing ISPs and customers to work together to insert proper information into Whois at the time of sub-delegation.

## Policy statement:

Insert two new sections into NRPM 3:

### 3.7 New POC Validation Upon Reassignment

When an ISP submits a valid reallocation or detailed reassignment request to ARIN which would result in a new POC object being created, ARIN must (before otherwise approving the request) contact the new POC by email for validation. ARIN's notification will, at a minimum, notify the POC of:

- the information about the organization submitting the record; and
- the resource(s) to which the POC is being attached; and
- the organization(s) to which the POC is being attached.

If the POC validates the request, the request shall be accepted by ARIN and the new objects inserted into Whois. If the POC does not validate the request within 10 days, ARIN must reject the request.

### 3.8 Downstream Validation of Simple Reassignments

When an ISP submits a valid simple reassignment request to ARIN with an organization name OR postal address that is identical to one or more existing OrgIDs, ARIN will notify the downstream organization and obtain guidance on whether to accept the simple reassignment, or redirect it to one of the existing OrgIDs as a detailed reassignment.

# Recommended Draft Policy ARIN-2018-2

## Clarification to ISP Initial Allocation

**AC Shepherds:** Rob Seastrom, Kerrie Richards | **Latest Version:** 26 February 2019

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### **AC Assessment of Conformance with the Principles of Internet Number Resource Policy:**

This Recommended Draft Policy is technically sound and is fair and impartial number policy. This draft policy is an attempt to clarify the changes that came about from 2016-4. It also aligns section 4.2 with current transfer policy. It also re-established the understanding that ISP can renumber and return, by putting the last section 4.2.2.1.4 into the ISP additional requests section. The policy text has been changed and the proposed section 4.2.2.1.4 was deleted in its entirety.

### **Problem Statement:**

As discussed in more detail in ARIN-2017-9 and noted in the ARIN 40 Policy Experience Report, the criteria to qualify for an initial block of address space in 4.2.2 and 8.5.4 are seeming at odds with each other. At ARIN 41 the community seemed to prefer the approach contained in this policy over the approach in ARIN-2017-9, which was subsequently abandoned.

Moreover, as the NRPM (2018-1) currently sits, 4.2.2 appears to state that an initial allocation of up to a /21 could be granted without any more justification than needed to qualify for a /24. Therefore, 4.2.2 should be modified, allowing an initial allocation of only a /24 without any additional justification and allowing an initial allocation of up to a /21 when justified by a 24-month allocation plan.

### **Policy Statement:**

Replace the current Section 4.2.2 with:

#### 4.2.2. Initial allocation to ISPs

All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /21, subject to ARIN's minimum allocation size.

All ISP organizations without direct allocations, direct assignments, re-allocations or reassignments automatically qualify for a /24. These organizations are exempt from requirements of showing the efficient utilization of previously held IPv4 space. These organizations may qualify for a larger than a /24 by documenting how the requested allocation will be utilized within the request size specified in 4.2.4.3

ISPs holding re-allocations and/or reassignments must show the efficient utilization of their resources consistent with the requirements in sections 4.2.3 and 4.2.4

### **Comments:**

**Timetable for Implementation:** Immediate

### **Anything Else:**

This is an attempt to clarify the changes that came about from 2016-4. It also aligns section 4.2 with current transfer policy. It also re-established the understanding that ISP can renumber and return, but putting the last

section 4.2.2.1.4 into the ISP additional requests section. This text is slightly modified to include returns to ARIN in addition to returns to the upstream.

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Earlier Version

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Version Date: 15 November 2018

AC Assessment of Conformance with the Principles of Internet Number Resource Policy:

This Recommended Draft Policy is technically sound and is fair and impartial number policy. This draft policy is an attempt to clarify the changes that came about from 2016-4. It also aligns section 4.2 with current transfer policy. It also re-established the understanding that ISP can renumber and return, by putting the last section 4.2.2.1.4 into the ISP additional requests section. The policy text has been changed and the proposed section 4.2.2.1.4 was deleted in its entirety.

Problem Statement:

As discussed in more detail in ARIN-2017-9 and noted in the ARIN 40 Policy Experience Report, the criteria to qualify for an initial block of address space in 4.2.2 and 8.5.4 are seeming at odds with each other. At ARIN 41 the community seemed to prefer the approach contained in this policy over the approach in ARIN-2017-9, which was subsequently abandoned.

Moreover, as the NRPM (2018-1) currently sits, 4.2.2 appears to state that an initial allocation of up to a /21 could be granted without any more justification than needed to qualify for a /24. Therefore, 4.2.2 should be modified, allowing an initial allocation of only a /24 without any additional justification and allowing an initial allocation of up to a /21 when justified by a 24-month allocation plan.

Policy Statement:

Replace the current Section 4.2.2 with:

4.2.2. Initial allocation to ISPs

All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /21, subject to ARIN's minimum allocation size.

All ISP organizations without direct allocations, direct assignments, re-allocations or reassignments automatically qualify for a /24. These organizations are exempt from requirements of showing the efficient utilization of previously held IPv4 space. These organizations may qualify for up to and including a /21 by documenting how the requested allocation will be utilized within the request size specified in 4.2.4.3

ISPs holding re-allocations and/or reassignments must show the efficient utilization of their resources consistent with the requirements in sections 4.2.3 and 4.2.4

Comments:

The timetable for Implementation: Immediate

Anything Else:



This is an attempt to clarify the changes that came about from 2016-4. It also aligns section 4.2 with current transfer policy. It also re-established the understanding that ISP can renumber and return, but putting the last section 4.2.2.1.4 into the ISP additional requests section. The policy text has been changed and the proposed section 4.2.2.1.4 was deleted in its entirety.

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Earlier Version

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Version Date: 23 June 2018

Problem Statement:

As discussed in more detail in ARIN-2017-9 and noted in the ARIN 40 Policy Experience Report, the criteria to qualify for an initial block of address space in 4.2.2 and 8.5.4 are seeming at odds with each other. At ARIN 41 the community seemed to prefer the approach contained in this policy over the approach in ARIN-2017-9, which was subsequently abandoned.

Moreover, as the NRPM (2018-1) currently sits, 4.2.2 appears to state that an initial allocation of up to a /21 could be granted without any more justification than needed to qualify for a /24. Therefore, 4.2.2 should be modified, allowing an initial allocation of only a /24 without any additional justification and allowing an initial allocation of up to a /21 when justified by a 24-month allocation plan.

Policy Statement:

Replace the current Section 4.2.2 with:

#### 4.2.2. Initial allocation to ISPs

All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /21, subject to ARIN's minimum allocation size.

All ISP organizations without direct allocations, direct assignments, re-allocations or reassignments automatically qualify for a /24. These organizations are exempt from requirements of showing the efficient utilization of previously held IPv4 space. These organizations may qualify for a larger than a /24 by documenting how the requested allocation will be utilized within the request size specified in 4.2.4.3

ISPs holding re-allocations and/or reassignments must show the efficient utilization of their resources consistent with the requirements in sections 4.2.3 and 4.2.4

Comments:

The timetable for Implementation: Immediate

Anything Else:

This is an attempt to clarify the changes that came about from 2016-4. It also aligns section 4.2 with current transfer policy. It also re-established the understanding that ISP can renumber and return, but putting the last section 4.2.2.1.4 into the ISP additional requests section. This text is slightly modified to include returns to ARIN in addition to returns to the upstream.

#####

Earlier Version

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Version Date: 20 March 2018

Problem Statement:

The criteria to qualify for an initial block of address space in 4.2.2 and 8.5.4 are at odds with each other.

Moreover, as the NRPM (2018-1) currently sits, 4.2.2 appears to state that an initial allocation of up to a /21 could be granted without any more justification than needed to qualify for a /24.

Policy Statement:

Replace the current Section 4.2.2 with:

4.2.2. Initial allocation to ISPs

All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /21, subject to ARIN's minimum allocation size.

All ISP organizations without direct allocations, direct assignments, re-allocations or reassignments automatically qualify for a /24. These organizations are exempt from requirements of showing efficient utilization of previously held IPv4 space. These organizations may qualify for a larger than a /24 by documenting how the requested allocation will be utilized within the request size specified in 4.2.4.3

ISPs holding re-allocations and/or reassignments must show efficient utilization of their resources consistent with the requirements in sections 4.2.3 and 4.2.4

Comments:

Timetable for Implementation: Immediate

Anything Else:

This is an attempt to clarify the changes that came about from 2016-4.

It also aligns section 4.2 with current transfer policy.

It also also re-established the understanding that ISP can renumber and retrun, but putting the last section 4.2.2.1.4 into the ISP additional requests section. This text is slightly modified to include returns to ARIN in addition to returns to the upstream.

ARIN STAFF & LEGAL ASSESSMENT

Draft Policy ARIN-2018-2

Clarification to ISP Initial Allocation and Permit Renumbering

Date of Assessment: 11 October 2018

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## Summary (Staff Understanding)

Draft Policy 2018-2 NRPM section 4.2.2 Initial allocation to ISPs provides the criteria that organizations without direct assignments for allocations from ARIN must meet in order to receive an initial amount of IPv4 address space. It states very clearly that all ISP organizations without direct allocations, direct assignments, re-allocations or reassignments automatically qualify for a /24 of IPv4 space. These organizations may qualify for more than a /24 but no more than a /21 of IPv4 space by providing documentation on how the space will be utilized following the guidance in NRPM 4.2.4.3 which today states up to a 24-month supply of IPv4 addresses. DP 2018-2 provides guidance for ISPs that hold re-allocations and/or assignments by stating that they must show efficient utilization of their resources consistent with the requirements of 4.2.3 and 4.2.4.

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## Comments

### A. ARIN Staff Comments

This is a very straight forward change to NRPM 4.2.2. Initial allocation to ISPs and will be easy to implement if approved. Once implemented ARIN staff will be able to approve an initial allocation of a /24 to any ISP that applies and does not currently have a direct assignment, allocation, re-allocation or reassignment. ISPs may qualify for a larger block by providing documentation of utilization in accordance with NRPM 4.2.4.3.

Organizations that currently hold IPv4 resources must show efficient utilization of their current resources consistent with the requirements of 4.2.3 and 4.2.4 in order to qualify for additional IPv4 address space.

It would be more clear for the community to repeat the /21 maximum in the 3rd sentence of the 2nd paragraph so that it reads "These organizations may qualify for up to and including a /21 by documenting how the requested allocation will be utilized within the request size specified in 4.2.4.3"

It is recommended that the title be changed to drop the "and Permit Renumbering" and that the Anything Else: portion of the proposal be updated to reflect that the policy text has been changed and the proposed section 4.2.2.1.4 was deleted in its entirety.

This policy does align this section with current transfer policy language.

### B. ARIN General Counsel – Legal Assessment

There are no material legal issues regarding this proposal.

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## Resource Impact

Implementation of this policy would have minimal impact. 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

None to minimum engineering work will be required

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Proposal/Draft Policy Text Assessed

Draft Policy 2018-2: Clarification to ISP Initial Allocation and Permit Renumbering

Version Date: 23 June 2018

Problem Statement:

As discussed in more detail in ARIN-2017-9 and noted in the ARIN 40 Policy Experience Report, the criteria to qualify for an initial block of address space in 4.2.2 and 8.5.4 are seeming at odds with each other. At ARIN 41 the community seemed to prefer the approach contained in this policy over the approach in ARIN-2017-9, which was subsequently abandoned.

Moreover, as the NRPM (2018-1) currently sits, 4.2.2 appears to state that an initial allocation of up to a /21 could be granted without any more justification than needed to qualify for a /24. Therefore, 4.2.2 should be modified, allowing an initial allocation of only a /24 without any additional justification and allowing an initial allocation of up to a /21 when justified by a 24-month allocation plan.

Policy Statement:

Replace the current Section 4.2.2 with:

4.2.2. Initial allocation to ISPs

All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /21, subject to ARIN's minimum allocation size.

All ISP organizations without direct allocations, direct assignments, re-allocations or reassignments automatically qualify for a /24. These organizations are exempt from requirements of showing the efficient utilization of previously held IPv4 space. These organizations may qualify for a larger than a /24 by documenting how the requested allocation will be utilized within the request size specified in 4.2.4.3

ISPs holding re-allocations and/or reassignments must show the efficient utilization of their resources consistent with the requirements in sections 4.2.3 and 4.2.4

Comments:

The timetable for Implementation: Immediate

Anything Else:

This is an attempt to clarify the changes that came about from 2016-4. It also aligns section 4.2 with current transfer policy. It also re-established the understanding that ISP can renumber and return, but putting the last section 4.2.2.1.4 into the ISP additional requests section. This text is slightly modified to include returns to ARIN in addition to returns to the upstream.

# Recommended Draft Policy ARIN-2018-5

## Disallow Third-party Organization Record Creation

**AC Shepherds:** Andrew Dul, Owen DeLong | **Latest Version:** 4 February 2019

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### **Problem Statement:**

Since the introduction of simple-reassignment some years ago, it is no longer necessary to allow for third-parties (such as upstream ISPs) to create organization records for another entity (such as their customers). In particular, many entities find that spurious organization records are routinely created in their name, causing both confusion and entity + staff time for clean-up.

Therefore, this policy establishes that organization records shall be created only by the entity represented by the organization record, and should be created only through an explicit request to ARIN. ISPs wishing to reassign space to customers should either ask the customer for their ORG-ID or shall use the “simple reassignment” method which does not require nor create new organization records. ISPs wishing to reallocate space to customers should ask the customer for their ORG-ID.

### **Policy statement:**

Add new section(s) into the NRPM:

3.X Directory Service Records

3.X.1 Organization Record Creation

New organization records shall be created upon ARIN receiving a request directly from an authorized contact representing an entity that ARIN is able to validate. Organization records shall not be created upon the request of third-parties.

### **Comments:**

**Timetable for implementation:** Immediate

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ARIN STAFF & LEGAL ASSESSMENT  
Draft Policy ARIN-2018-05  
Disallow Third-party Organization Record Creation

Date of Assessment: 5 March 2019

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### Summary (Staff Understanding)

Draft Policy 2018-05 requires that only an authorized contact, that is verified by ARIN, be allowed to create new organization records. The request must be submitted directly to ARIN by the verified authorized contact and no

third-parties shall be allowed to create organization records on behalf of the new organization. This means that organizations wishing to reallocate/reassign address space to their customers must coordinate with that customer to ensure they have created an OrgID through ARIN online. ARIN will need to ensure that no matter which method is used to reallocate/reassign address space the OrgID will be verified prior to approving the action.

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## Comments

### A. ARIN Staff Comments

- Draft Policy 2018-05: Disallow Third-party Organization Record Creation will have an impact on registration services department (RSD) as there will be more organizations created through the ARIN Online application which requires an analyst to work the ticket with the customer.
- Overall these changes will result in more accurate information in the ARIN Whois database.
- The development effort for these changes is estimated to take 4 weeks.
- This policy could be implemented as written.

### B. ARIN General Counsel – Legal Assessment

- No material legal risk in this policy

## Resource Impact

Implementation of this policy would have a medium resource impact. It is estimated that this policy could be implemented 90 days after ratification by the ARIN Board of Trustees.

- Updated guidelines and internal procedures
- Updated documentation on website
- Additional workload on RSD for processing Org Create tickets
- Medium engineering effort will be required

## Proposal/Draft Policy Text Assessed

Version Date: 4 February 2019

## Problem Statement:

Since the introduction of simple-reassignment some years ago, it is no longer necessary to allow for third-parties (such as upstream ISPs) to create organization records for another entity (such as their customers). In particular, many entities find that spurious organization records are routinely created in their name, causing both confusion and entity + staff time for clean-up.

Therefore, this policy establishes that organization records shall be created only by the entity represented by the organization record, and should be created only through an explicit request to ARIN. ISPs wishing to reassign space to customers should either ask the customer for their ORG-ID or shall use the “simple reassignment”

method which does not require nor create new organization records. ISPs wishing to reallocate space to customers should ask the customer for their ORG-ID.

Policy statement:

Add new section(s) into the NRPM:

### 3.X Directory Service Records

#### 3.X.1 Organization Record Creation

New organization records shall be created upon ARIN receiving a request directly from an authorized contact representing an entity that ARIN is able to validate. Organization records shall not be created upon the request of third-parties.

Comments:

Timetable for implementation: Immediate

#####

Earlier version

#####

Version Date: 20 November 2018

Problem Statement:

Since the introduction of simple-reassignment some years ago, it is no longer necessary to allow for third-parties (such as upstream ISPs) to create organization records for another entity (such as their customers). In particular, many entities find that spurious organization records are routinely created in their name, causing both confusion and entity + staff time for clean-up.

Therefore, this policy establishes that organization records shall be created only by the entity represented by the organization record, and should be created only through an explicit request to ARIN. ISPs wishing to reassign space to customers should either ask the customer for their ORG-ID or shall use the "simple reassignment" method which does not require nor create new organization records. ISPs wishing to reallocate space to customers should ask the customer for their ORG-ID.

Policy Statement:

Add new sections into the NRPM:

### 3.7 Organization and Resource Records

#### 3.7.1 Organizations

ARIN shall track and publish a database of organizations which have registered with ARIN or have, in the past, received resources from ARIN or a predecessor registry. New organization records shall be created upon ARIN receiving a request directly from an authorized contact representing an entity that ARIN is able to validate. Organization records shall not be created upon the request of third-parties or by a side-effect of other registration activity, including but not limited to reassignment and reallocation.

## 3.7.2 Resources

ARIN shall track and publish a database of resources which have been issued by ARIN or a predecessor registry to entities. Resources so issued may, as permitted by other sections of this policy manual, be further sub-delegated to other entities. Such sub-delegations shall be tracked in the ARIN database as specified in this section, or shall be published as specified in section 3.2.

### 3.7.2.1 Direct Allocations and Assignments

Direct allocations and direct assignments of resources from ARIN to an entity shall be reflected in the database and shall list the registered organization (previously created, by the entity, pursuant to section 3.7.1) to which those resources are allocated or assigned.

### 3.7.2.2 Reallocations and Reassignments

Except as permitted by sections 3.2 or 3.7.2.3, ISPs which are required to publish reallocations and reassignments to customers shall do so by entering records into the ARIN database listing the registered organization (previously created, by the customer, pursuant to section 3.7.1) to which those resources are reallocated or reassigned.

### 3.7.2.3 Simple Reassignments

ISPs which are required to publish reassignments to customers may elect to use the "simple reassignment" method in lieu of the other methods as specified in section 3.2 or 3.7.2.2. The simple reassignment method does not require the customer entity to have registered as an organization with ARIN. Instead, the ISP may furnish to ARIN a limited set of customer information (such as the entity name and address) along with the IP address range or prefix to be delegated. ARIN shall create a limited-purpose "customer" record for such entities in lieu of full organization records as specified in section 3.7.1. These customer records shall be clearly distinguishable in the ARIN database.

Comments:

Timetable for implementation: Immediate



# Draft Policy ARIN-2018-6

## Clarify Reassignment Requirements in 4.2.3.7.1

**AC Shepherds:** Alyssa Moore, Alison Wood | **Latest Version:** 20 November 2018

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### **Problem Statement:**

Current NRMP section “Reassignment and Reallocation Information” is being interpreted by some organizations to require a “detailed reassignment” for all customers. Under the current reassignment schema, only a “detailed reassignment or reallocation” contains fields for “organizational information”.

This policy intends to simplify the reassignment requirements by noting that only a customer’s name is required. Thus a “simple reassignment” can be used for most reassignments.

### **Policy Statement:**

Replace section 4.2.3.7.1 with the following:

#### 4.2.3.7.1. Reassignment and Reallocation Information

Each IPv4 reassignment or reallocation containing a /29 or more addresses shall be registered via a directory services system which meets the standards set forth in section 3.2.

Reassignment registrations must include each customer name, except where specifically exempted by this policy. Reassignment registrations shall only include point of contact (POC) information if either: (1) requested by the customer; or (2) the reassigned block is intended to be routed and announced outside of the provider’s network.

Reallocation registrations must contain the customer’s organization name and appropriate point of contact (POC) information.

### **Comments:**

**Timetable for implementation:** Immediate

# Draft Policy ARIN-2019-1

## Clarify Section 4 IPv4 Request Requirements

AC Shepherds: Amy Potter, Kat Hunter | Latest Version: 26 February 2019

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### Problem Statement:

Per a recent ARIN Policy Experience Report and resulting AC discussion, it was noted that the language of Section 4.1.8 is imprecise in that it can be interpreted as specifying a waiting period for any allocation activity, as opposed to being intended to limit only the frequency of IPv4 allocations under Section 4.

The same Policy Experience Report also noted that ARIN staff has observed a pattern where an organization transfers space under NRPM Section 8.2 to a specified recipient, and then immediately applies for space under Section 4. This activity appears to be speculative in nature and not consistent with sound address management policy.

The updated language in this proposal addresses the two issues above, as both concerns can be addressed via modifications to the same section and sentence thereof of the NRPM:

- Clarifies the waiting period to only prohibit requests for IPv4 allocations under Section 4 of the NRPM
- Disallows organizations that have transferred space to other parties within the past 12 months from applying for additional IPv4 space under NRPM Section 4.

### Policy Statement:

Current language found in NRPM Section 4.1.8 - Unmet Requests:

Repeated requests, in a manner that would circumvent 4.1.6, are not allowed: an organization may only receive one allocation, assignment, or transfer every 3 months, but ARIN, at its sole discretion, may waive this requirement if the requester can document a change in circumstances since their last request that could not have been reasonably foreseen at the time of the original request, and which now justifies additional space.

### Proposed new language:

Repeated requests, in a manner that would circumvent 4.1.6 are not allowed: an organization may not apply for IPv4 address resources under this section if they have received an allocation, assignment, or transfer of IPv4 resources less than three months prior, or if the organization has transferred space to another party under Section 8 less than 12 months prior. ARIN, at its sole discretion, may waive this restriction if the requester can document a change in circumstances since their last request that could not have been reasonably foreseen at the time of the original request, and which now justifies additional space.

### Comments:

This proposal incorporates two related policy goals, combined for convenience in one proposal as both can be addressed via modification of the same section and sentence of the NRPM. These policy goals are severable if the community prefers to address them independently.

# Draft Policy ARIN-2019-2

## Waiting List Block Size Restriction

**AC Shepherds:** Alison Wood, Andrew Dul | **Latest Version:** 26 February 2019

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### **Problem Statement:**

A substantial amount of misuse of the waiting list is suspected by ARIN staff. A significant percentage of organizations that receive blocks from the waiting list subsequently issue these blocks to other organizations via 8.3 or 8.4 transfers shortly after the one year waiting period required before engaging in such outbound transfers. Most of these cases involve larger-sized blocks, and many involve organizations that already have large IPv4 holdings. Some organizations engage in this practice multiple times, rejoining the waiting list shortly after transferring out blocks previously received on the waiting list. There are even cases of multiple startup organizations requesting approval to be placed on the waiting list where these organizations' requests can all be tracked originating from the same IP address. While it is possible that some of these cases are legitimate, and while it is difficult for ARIN to prove fraud in most individual cases, the large number of cases like these indicates a high likelihood that there is significant misuse of the waiting list. Specifically, some organizations are likely being dishonest in projecting their need for IPv4 space with the intent of receiving blocks off the waiting list so that they can sell them one year after receiving them. In the case of multiple startups, some organizations that receive blocks on the waiting list subsequently perform a 8.2 merger/acquisition, allowing them to sell the blocks even before the one year waiting period.

The problem is serious enough that the ARIN Board of Trustees has suspended issuance of number resources while a solution to this problem is found, and it is unfair to organizations with legitimate need on the waiting list that they are being crowded out and delayed by those looking to game the system.

### **Policy Statement:**

Actual Text:

#### 4.1.8. Unmet requests

In the event that ARIN does not have a contiguous block of addresses of sufficient size to fulfill a qualified request, ARIN will provide the requesting organization with the option to specify the smallest block size they'd be willing to accept, equal to or larger than the applicable minimum size specified elsewhere in ARIN policy. If such a smaller block is available, ARIN will fulfill the request with the largest single block available that fulfills the request. If no such block is available, the organization will be provided the option to be placed on a waiting list of pre-qualified recipients, listing both the block size qualified for and the smallest block size acceptable.

New Text:

#### 4.1.8. Unmet requests

In the event that ARIN does not have a contiguous block of addresses of sufficient size to fulfill a qualified request, ARIN will provide the requesting organization with the option to specify the smallest block size they'd be willing to accept, equal to or larger than the applicable minimum size specified elsewhere in ARIN policy. If such a smaller block is available, ARIN will fulfill the request with the largest single block available that fulfills the request.

If no such block is available, the organization will be provided the option to be placed on a waiting list of pre-qualified recipients, listing both the block size qualified for or a /22, whichever is smaller, and the smallest block size acceptable, not to exceed a /22.

**Comments:**

**Timeframe for Implementation:** Immediate

**Anything Else:** By limiting the maximum block size for waiting list recipients to a /22, the financial incentive to misuse the waiting list to receive blocks with the intent to sell them will be drastically reduced. The majority of waiting list requests are for smaller block sizes, and these requests will be more readily met as the abusers will no longer be crowding out the legitimate organizations with need. The original intent of the waiting list to help smaller organizations and new entrants will be realized. RIPE, APNIC and LACNIC do not have waiting lists, but they each have an emergency pool geared toward new recipients with a /22 limit which has largely curtailed abuse. Organizations that genuinely qualify for larger blocks can still obtain these in the marketplace through 8.3 transfers.

# Draft Policy ARIN-2019-3

## Update 4.10 – IPv6 Deployment Block

**AC Shepherds:** Alicia Trotman, Owen DeLong | **Latest Version:** 20 November 2018

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### **Problem Statement:**

ARIN staff has noted that the current 4.10 policy is causing problems in its implementation.

The current policy specifies a /28 minimum. However, ARIN can only allocate a /24 as its minimum size. ARIN's current tools only support a minimum of /24 for reverse DNS.

The current RPKI landscape is also an impediment to using smaller block sizes. Furthermore, a /28 practically is unroutable, so an organization if they were to receive a /28 would be unable to functionally interoperate with most IPv4 end points, for applications which were noted examples in the original policy. (At the time of writing the original policy, it was hoped that by creating a policy with a smaller block size other RIRs and network operators would embrace the routing of blocks smaller than a /24.)

Updating ARIN's tools to allow smaller than a /24 for reverse DNS (such as RFC2317) would likely be a large cost compared value received by the community. This value is further diminished because the purpose of an IPv4 block to facilitate IPv6 deployment is that it be routable to the rest of the IPv4 Internet.

This policy attempts to address these issues, by raising the minimum size to a /24 and limits total amount an organization can receive to a /21. It also removes the requirement for return and renumber, since that was primarily added to allow organizations to obtain larger blocks if that was necessary. The policy also clarifies the utilization requirements by placing them directly in this section rather than a reference to the utilization requirements of end users.

### **Policy Statement:**

Replace current 4.10 with the following updated section

#### 4.10 Dedicated IPv4 block to facilitate IPv6 Deployment

ARIN shall allocate a contiguous /10 from its last /8 IPv4 allocation from IANA. This IPv4 block will be set aside and dedicated to facilitate IPv6 deployment. Allocations and assignments from this block must be justified by immediate IPv6 deployment requirements. Examples of such needs include: IPv4 addresses for key dual stack DNS servers, and NAT-PT or NAT464 translators. ARIN staff will use their discretion when evaluating justifications.

This block will be subject to a minimum and maximum size allocation of /24. ARIN should use sparse allocation when possible within that /10 block.

In order to receive an allocation or assignment under this policy:

- the applicant may not have received resources under this policy in the preceding six months and cannot receive more than a /21 under this policy section;

- previous allocations/assignments under this policy must continue to meet the justification requirements of this policy;
- previous allocations/assignments under this policy must be utilized to at least 80% to obtain an additional allocation or assignment;
- the applicant must demonstrate that no other allocations or assignments will meet this need.

**Comments:**

**Timetable for implementation:** Immediate

# Draft Policy ARIN-2019-4

## Allow Inter-regional IPv6 Resource Transfers

**AC Shepherds:** David Farmer, Joe Provo | **Latest Version:** 26 March 2019

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### **Problem Statement:**

There is an operational need to allow RIR transfers of IPv6 resources between RIRs with an equivalent transfer policy. ARIN's RPKI Trust Anchor (TA) is measurably less widely deployed than TAs from other RIRs. As a consequence, RPKI ROAs published through ARIN offer less value. Operators seeking to extract the most value from their investment in IPv6 would benefit from the ability to transfer IPv6 resources to RIRs with more widely deployed RPKI Trust Anchors.

### **Policy Statement:**

Change the first sentence in section 8.4 from:

“Inter-regional transfers of IPv4 number resources and ASNs may take place only via RIRs who agree to the transfer and share reciprocal, compatible needs-based policies.”

To:

“Inter-regional transfers of Internet number resources may take place only via RIRs who agree to the transfer and share reciprocal, compatible needs-based policies.”

### **Comments:**

**Timetable for implementation:** Immediate

Anything Else:

- <https://blog.benjojo.co.uk/post/state-of-rpki-in-2018>
- <https://blog.benjojo.co.uk/post/are-bgps-security-features-working-yet-rpki>
- <https://mailman.nanog.org/pipermail/nanog/2019-January/098719.html>
- <https://mailman.nanog.org/pipermail/nanog/2019-January/098751.html>

# Draft Policy ARIN-2019-6

## Longer Hold Time Requirements for 4.1.8 Recipients

**AC Shepherds:** Rob Seastrom, Joe Provo | **Latest Version:** 26 March 2019

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### **Problem Statement:**

The ARIN Board of Trustees has recently suspended issuance of reclaimed number resources under the NRPM 4.1.8 waiting list policy due to concerns about “flipping” behavior by recipient organizations.

The minimum hold time before (12 months) for recipients of number resources received via 4.1.8 is currently no different than if they had received it as an incoming 8.3 transfer. We believe that a longer hold time of 24 months, while not a complete solution, will serve as an incremental disincentive to flipping schemes while representing no downside for organizations that are actually using said number resources.

### **Policy Statement:**

Add the following bullet point under “Conditions on source of the transfer” in sections 8.3 and 8.4:

The source entity must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN under the Section 4.1.8 “Unmet Requests” waiting list policy for the 24 months prior to the approval of a transfer request.

### **Comments:**

**Timetable for implementation:** Immediate



# Draft Policy ARIN-2019-7

## Elimination of the Waiting List

**AC Shepherds:** Alyssa Moore, Amy Potter | **Latest Version:** 26 March 2019

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### **Problem Statement:**

The ARIN “Unfulfilled Requests” policy (NRPM 4.1.8 et seq) creates an opportunity for an ARIN member to claim need for number resources, wait for those resources to become available via returns or reclamations, acquire them, wait a year and a day, and then profit from them via a Section 8.3 transfer.

In a post-depletion environment in which needs for additional number resources are met via the secondary market, this policy provides valuable number resources essentially for free, creating an opportunity for windfall profits and incentivizing various kinds of misrepresentation or manipulation of registration services.

ARIN can avoid this problem by abolishing the waiting list and transferring returned and reclaimed resources to organizations that have qualified via the existing 8.3 process.

### **Policy Statement:**

Delete section 4.1.8. Unmet Requests as well as sections 4.1.8.1. Waiting List and 4.1.8.2. Fulfilling Unmet Needs

Add policy section: 4.1.10 - Returned and Reclaimed Resources

ARIN will auction returned and reclaimed IPv4 number resources to recipients qualified under Section 8.3. Revenues realized from this activity will be allocated for purposes as directed by the Board of Trustees.

### **Comments:**

**Timetable for implementation:** Immediate

### **Anything Else:**

The specific auction methods and implementation details used to distribute the returned address pool are outside of the purview of the Public Policy Process; they are intentionally left to the Board to sort out.

# ARIN's Policy Development Process (PDP)

This version of the ARIN Policy Development Process was published on 14 January 2013. It supersedes the previous version.

## Part One – ARIN Policy Development Process Goals

### 1. Purpose

This document describes the ARIN Policy Development Process (PDP). The ARIN PDP is the process by which policies for the management of Internet number resources in the ARIN region are developed by the community. These Internet number resource policies are developed in an open, transparent, and inclusive manner that allows anyone to participate in the process.

The Policy Development Process encourages community participation, including allowing anyone to submit proposals for changes to number resource policy. The PDP is designed to bring forth clear, technically sound and useful policies for ARIN to use in the management and administration of Internet number resources. To accomplish this goal, the PDP charges the member-elected ARIN Advisory Council (AC) as the primary facilitators of the policy development process with appropriate checks and balances on its performance in that role.

Part One of this document provides the underlying goals for the Policy Development Process (including its purpose, scope, principles, and criteria for policy changes) and Part Two details the specific Policy Development Process used for development of changes to Internet number resource policy. Part Three details the processes for petitioning specific aspects of the Policy Development Process.

### 2. Definitions

#### Internet Number Resources

Internet number resources consist of Internet Protocol version 4 (IPv4) address space, Internet Protocol version 6 (IPv6) address space, and Autonomous System (AS) numbers.

#### Policy Proposal

An idea for a policy that is submitted to the Policy Development Process. Members of the ARIN Advisory Council and ARIN staff work with the originator to refine the Policy Proposal so that it contains a clear statement of the existing problem with Internet number resource policy and suggested changes to Internet number resource policy text to address the problem. In cooperation with ARIN staff, the Advisory Council also confirms each Policy Proposal is within scope (per Section 3) of the PDP.

#### Draft Policy

A Policy Proposal that is complete and in scope for the PDP is accepted by the Advisory Council and becomes a Draft Policy.

The Advisory Council further develops the Draft Policy, working in cooperation with the policy originator if available. A Draft Policy, once fully developed, consists of a clear problem statement, proposed changes to number resource policy text, and an assessment of the conformance of the Draft Policy to ARIN's Principles of Internet Number Resource Policy (as specified in Part One, Section 4 of the PDP).

## **Recommended Draft Policy**

A Recommended Draft Policy is the result of a Draft Policy being fully developed (containing clear problem statement, proposed changes to policy text, and an assessment of conformance to the PDP principles) and then being recommended for adoption by action of the ARIN Advisory Council. A Draft Policy becomes a Recommended Draft Policy once the Advisory Council believes with a high likelihood that the Draft Policy satisfies ARIN's Principles of Internet Number Resource Policy. Recommended Draft Policies must undergo community consultation and a "Last Call" period before being considered for adoption.

## **Adopted Policy**

A policy that has been adopted by the ARIN Board of Trustees. Adopted Policies are incorporated into ARIN's Number Resource Policy Manual (NRPM) as of their effective date.

## **Public Policy Mailing List (PPML)**

The ARIN public mailing list for discussion of Internet number resource policy.

## **Public Policy Consultation (PPC)**

An open public discussion held by ARIN of Internet number resource policy that provides for the contemporaneous interaction and polling of in-person and remote participants. These consultations may be held at ARIN's Public Policy Meetings and at other related forums as approved by the ARIN Board of Trustees.

## **Public Policy Meeting (PPM)**

A public forum held periodically by ARIN that includes Public Policy Consultations of all Draft and Recommended Draft Policies. Public Policy Meetings are held at least annually, although Public Policy Consultations for selected Draft or Recommended Draft Policies may be held in between Public Policy Meetings in similar open forums.

## **Petition**

An action initiated by any member of the community (including a proposal originator) if they are dissatisfied with the action taken by the Advisory Council regarding a specific Policy Proposal, Draft Policy or Recommended Draft Policy.

## **3. Scope of Internet Number Resource Policies**

### **3.1. Policies, not Processes, Fees, or Services**

Internet number resource policies developed through the PDP describe the policies and guidelines to be followed in number resource management, not the procedures that ARIN staff will use to implement the policies. ARIN staff develops appropriate procedures to implement policies after they are adopted.

Internet number resource policies are also distinctly separate from ARIN general business practices. ARIN's general business processes, fees, and services are not within the purview of the Policy Development Process, and while policies developed through the PDP may apply to ARIN's service offering, they cannot define or establish ARIN fees or service offerings. All matters

concerning fees and service offerings are part of the fiduciary responsibility of the Board of Trustees. Note that the ARIN Consultation and Suggestion Process (ARIN ACSP) may be used to propose changes in non-policy areas.

Changes to policy that are purely editorial and non-substantial in nature are outside the scope of the full Policy Development Process and may only be made with 30 days public notice followed by the concurrence of both the ARIN Advisory Council and ARIN Board of Trustees that the changes are non-substantial in nature.

### **3.2. Relevant and Applicable within the ARIN Region**

Policies developed through the PDP are community self-regulatory statements that govern ARIN's actions in the management of Internet number resources. Policy statements must be applicable to some portion of the community for number resources managed within the ARIN region, and proposals to change policy must address a clearly defined, existing or potential problem with number resource policy in the region.

Note that the Policy Development Process for global policies follows a similar process within each RIR region with the additional process of ratification by the Internet Corporation for Assigned Names and Numbers (ICANN). The Global Policy Development Process is separately documented and facilitated by the Address Supporting Organization Address Council (ASO AC), and in these circumstances, the ARIN PDP is also used in the development of number resource policies with global applicability.

## **4. Principles of Internet Number Resource Policy**

Internet number resource policy must satisfy three important principles, specifically: 1) enabling fair and impartial number resource administration, 2) technically sound (providing for uniqueness and usability of number resources), and 3) supported by the community.

### **4.1. Enabling Fair and Impartial Number Resource Administration**

Internet number resources must be managed with appropriate stewardship and care. Internet number resource policy must provide for fair and impartial management of resources according to unambiguous guidelines and criteria. All policy statements must be clear, complete, and concise, and any criteria that are defined in policy must be simple and obtainable. Policy statements must be unambiguous and not subject to varying degrees of interpretation.

### **4.2. Technically Sound**

Policies for Internet number resource management must be evaluated for soundness against three overarching technical requirements: conservation, aggregation, and registration. More specifically, policies for managing Internet number resources must:

- Support both conservation and efficient utilization of Internet number resources to the extent feasible. Policy should maximize number resource availability to parties with operational need.
- Support the aggregation of Internet number resources in a hierarchical manner to the extent feasible. Policy should permit the routing scalability that is necessary for continued Internet growth. (Note that neither ARIN, nor its policies, can guarantee

routability of any particular Internet number resource as that is dependent on the actions of the individual Internet operators.)

- Support the unique registration of Internet number resources. Policy should prevent to the extent feasible any unknown or duplicate use of Internet number resources that could disrupt Internet communications.

Policies must achieve a technically sound balance of these requirements, and support for these technical requirements must be documented in the assessment of the policy change.

#### **4.3. Supported by the Community**

Changes to policy must be shown to have a strong level of support in the community in order to be adopted. The determination of support for the policy change is done by polling the community for support during a Public Policy Consultation (PPC).

The Policy Development Process, as a consensus-based collaborative development process, encourages incorporation of feedback received from participants where possible with the goal of increasing community support for policy changes.

A strong level of community support for a policy change does not mean unanimous; it may be demonstrated by a subset of the community, as long as the policy change enjoys substantially more support than opposition in the community active in the discussion.

### **5. ARIN Board of Trustees Criteria for Policy Changes**

In order to maintain fidelity to the duty performed by ARIN on behalf of the Internet community, changes to Internet number resource policy must meet two specific criteria before being adopted by the ARIN Board of Trustees: 1) in compliance with law and ARIN's mission, and 2) developed via open and transparent processes.

#### **5.1. In Compliance with Law and ARIN's Mission**

Policies developed through the PDP must advance ARIN's mission, not create unreasonable fiduciary or liability risk, and must be consistent with ARIN's Articles of Incorporation, Bylaws, and all applicable laws and regulations.

#### **5.2. Developed by Open, Transparent, and Inclusive Processes**

Changes to policy must be developed via open and transparent processes that provide for participation by all. Policies must be considered in an open, publicly accessible forum as part of the adoption process. Policy discussions in the ARIN region are conducted on the Public Policy Mail List (PPML) and via Public Policy Consultation (PPC). There are no requirements for participation other than adherence to the guidelines of behavior and decorum, and anyone interested in following the process may subscribe to the PPML or may participate without charge in Public Policy Consultations via in person or remote participation methods.

All aspects of the PDP are documented and publicly available via the ARIN website. The PPML is archived. The proceedings of each PPM are published. All policies are documented in the Number Resource Policy Manual (NRPM). All Draft Policies are cross referenced to the original Policy Proposal, the archives of the PPML, all related PPC proceedings, and the minutes of the appropriate Advisory Council and the ARIN Board of Trustees meetings. The procedures that are

developed to implement the policy are documented, publicly available, and followed by the ARIN staff.

The Policy Development Process itself may only be changed by the ARIN Board of Trustees after a public consultation period to consider the proposed changes.

## **Part Two – The Policy Development Process**

This section provides the details of the ARIN Policy Development Process. A graphical flow depiction of the process is provided at Appendix A. All references to "days" are calendar days.

All ARIN Advisory Council (AC) decisions on policy matters require an affirmative roll call vote of the majority of the members of the full AC, unless otherwise specified.

### **1. The Policy Proposal**

Policy Proposals may be submitted to the ARIN Policy Development Process (PDP) by anyone in the global Internet community except for members of the ARIN Board of Trustees or the ARIN staff. Policy Proposals may be submitted any time by sending them to [policy@arin.net](mailto:policy@arin.net). Upon receipt of a new Policy Proposal, the ARIN staff assigns it a Policy Proposal number, posts the Policy Proposal to the public web site, and notifies the AC of a new Policy Proposal available for consideration. The AC designates one or more members to work with the policy originator as needed. The assigned AC members and ARIN staff will work with the originator as described below to prepare the Policy Proposal for evaluation by the AC.

The assigned members of the AC work with the proposal originator by providing feedback regarding the clarity and understanding of the Policy Proposal. The merits of the Policy Proposal itself are not considered at this time; the Policy Proposal is revised as needed so that it contains a clear statement of the problem with existing Internet number resource policy, that any suggested changes to Internet number resource policy text are understandable to the ARIN staff and community, and to identify and correct any potential scope considerations of the Policy Proposal.

The proposal originator may revise (or not) the Policy Proposal based on the feedback received. Once the originator and assigned members of the AC are satisfied with the scope and clarity of the Policy Proposal, it is evaluated by the AC.

### **2. Policy Proposal Evaluation**

During Policy Proposal evaluation, the Advisory Council does not evaluate the merits of Policy Proposal other than to confirm that the Policy Proposal is within scope of the Policy Development Process and contains a clear statement of the problem and suggested changes to number resource policy text. Upon submission to the AC, each Policy Proposal is evaluated in a timely manner to determine if the Policy Proposal is within scope of the Policy Development Process. Policy Proposals that are determined by the AC to be out of scope (e.g. for not addressing a clearly defined existing or expected problem, or that propose solutions involving other than number resource policy in the region) are rejected at this point, and the AC announces the rejection of a Policy Proposal along with an explanation of its reasoning on the ARIN Public Policy Mailing List (PPML).

The AC also evaluates whether the Policy Proposal contains a clear statement of the existing problem with Internet number resource policy including suggested changes to number resource policy text to address the problem. Once this has been confirmed, the AC accepts it as a Draft Policy for further

development work with the community. The AC announces the acceptance of a Policy Proposal as a Draft Policy on the PPML and encourages community discussion of its merits and concerns.

Policy Proposals that are determined by the AC to lack clarity are remanded back to the originator along with an explanation of the areas needing improvements in clarity. The proposal originator revises the Policy Proposal based on the feedback received, and again offers the revised Policy Proposal for evaluation by the AC.

The AC maintains a docket of all Policy Proposals. A submitted Policy Proposal that is not rejected upon evaluation as being out of scope remains on the docket as a Policy Proposal until it is withdrawn by the originator or accepted by the Advisory Council as a Draft Policy. Remanded Policy Proposals that are not revised by the originator within 60 days are deemed abandoned. Policy Proposals that have not been accepted as a Draft Policy after 60 days may be petitioned to Draft Policy status. Refer to PDP Part Three: Petition Process for a list of petitionable policy actions.

### **3. Draft Policy Discussion and Development**

The Advisory Council is responsible for the development of policies to meet ARIN's Principles of Internet Number Resource Policy (as described in Part One, Section 4). The Advisory Council maintains a docket of all Draft Policies.

As part of the policy development effort, the AC participates in and encourages the discussion of the Draft Policies on the PPML, notes the merits and concerns raised, and then based on its understanding of the relevant issues, the Advisory Council may take various actions including abandoning, revising or merging the Draft Policy with other Draft Policies. To the extent that the policy originators are available and responsive, the AC includes them in the revision process.

The AC may submit a Draft Policy at any time for a combined staff and legal review (and should do so after significant revisions to a Draft Policy). This review will be completed within 14 days. Upon receipt of the staff and legal review comments, the AC examines the comments to ensure their understanding and resolve any issues that may have been raised.

The AC announces any actions taken on Draft Policies along with an explanation of its reasoning on the PPML.

### **4. Recommendation of Draft Policies**

The Advisory Council develops and refines Draft Policies until they are satisfied that the Draft Policy meets ARIN's Principles of Internet Number Resource Policy (Part One, Section 4). Specifically, these principles are:

- Enabling Fair and Impartial Number Resource Administration
- Technically Sound
- Supported by the Community

Guided by the discussion of the Draft Policy on the PPML, Public Policy Consultations with the community (if any) and its best judgment, the AC assesses the conformance of each Draft Policy to these principles and documents the result in an assessment section within the Draft Policy. Any specific concerns expressed by a significant portion of the community must be explicitly noted and addressed in the assessment of the policy change.

Once a Draft Policy is fully developed and the AC is satisfied that it meets the principles of Internet number resource policy (including the support of the community based on online discussion that has occurred thus far), the AC recommends the Draft Policy for adoption. Recommended Draft Policies must undergo Public Policy Consultation with the community before proceeding to Last Call and being sent for consideration by the ARIN Board of Trustees.

## **5. Community Consultation and Public Policy Meetings**

ARIN holds periodic Public Policy Meetings (PPM) where the Advisory Council reports on the status of all Draft Policies and Recommended Draft Policies on its docket for discussion and feedback from the community. The presentation and discussion is referred to as a "Public Policy Consultation." Recommended Draft Policies may not be changed in the 30 days prior to its Public Policy Consultation.

As each Draft and Recommended Draft Policy is presented for Public Policy Consultation, members of the AC will provide the arguments for and against adoption (petitioned items are handled per PDP Part Three: Petition Process). The AC participates in the discussion during the Public Policy Consultation, and notes significant merits and concerns that were raised in the discussion for inclusion in the policy assessment. Based on the feedback received and its best judgment, the AC revises the Draft Policy to address concerns raised where it will improve the overall community support for the policy change.

Within the 60 days following a Public Policy Consultation on a Recommended Draft Policy, the AC reviews the result of the discussion (including any polls of support) and decides the appropriate next action.

## **6. Confirming Community Support for Recommended Draft Policies**

The Advisory Council confirms community support for Recommended Draft Policies, and this is done by polling community support for the policy change during a Public Policy Consultation.

The AC should carefully weigh the community support shown for a Recommended Draft Policy. Absence of clear community support is a strong indication that policy abandonment should be considered. A low level of overall support without opposition for a Recommended Draft Policy suggests further discussion of the merits of the policy change or abandonment. A clear split in the community support suggests that the AC should revise the Recommended Draft Policy to accommodate the concerns raised or further explain its consideration of the matter.

A Recommended Draft Policy that has demonstrated clear support (and only relatively low opposition for well-understood reasons) may be advanced to Last Call by the AC within 60 days of its Public Policy Consultation.

All Recommended Draft Policies not advanced to Last Call within 60 days of completion of their Public Policy Consultation will revert to Draft Policy status.

## **7. Last Call**

The Advisory Council advances Recommended Draft Policies with clear support to Last Call. Last Call provides an opportunity for final review by the community via discussion on the PPML. The last call period will be for a minimum of 14 days. The AC may decide that certain Recommended Draft Policies require a longer last call period of review (such as those that were revised based on comments received during Public Policy Consultation). If the AC sends a Recommended Draft Policy different than the Recommended Draft Policy presented during the Public Policy Consultation, then the Advisory Council



will provide a detailed explanation for all changes to the text and these specific changes must have been discussed during the community consultation.

The AC will review the results of the Last Call discussion, and will determine if they still recommend adoption by the ARIN Board of Trustees. The AC may make minor editorial changes to a Recommended Draft Policy and reissue it for Last Call. No other changes may be made while the policy is in Last Call.

A Recommended Draft Policy that has undergone a successful Last Call discussion may be sent to the ARIN Board of Trustees for adoption consideration. Decisions to send Recommended Draft Policies to the ARIN Board shall be made by the affirmative roll call vote of the two thirds of the members of the full Advisory Council. The results of the AC's decisions, and the reasons for them, are announced on the PPML.

All recommended policies not sent to the ARIN Board of Trustees for consideration within 60 days of Last Call completion will revert to Draft Policy status.

## **8. Board of Trustees Review**

The ARIN Board of Trustees evaluates a Recommended Draft Policy for adoption once it is received from the Advisory Council. In its review, the Board of Trustees evaluates the policy with respect to the Policy Development Goals of the PDP including specifically whether the ARIN Policy Development Process has been followed, and whether the policy is in compliance with law and ARIN's mission.

The Board of Trustees may adopt, reject or remand Recommended Draft Policies to the AC. All rejections will include an explanation. Remands will explain the need for further development. The Board of Trustees may also seek clarification from the AC without remanding the recommended policy. The results of the Board of Trustees' decision are announced on the ARIN Public Policy Mailing List (PPML).

## **9. Implementation**

The projected implementation date of the policy is announced at the time that adoption of the policy is announced. ARIN staff implements the policy and publishes an updated Number Resource Policy Manual (NRPM) that incorporates the adopted policy and which is identified by a new version number.

## **10. Special Policy Actions**

### **10.1 Emergency PDP**

If urgently necessary pursuant to ARIN's mission, the Board of Trustees may initiate policy by declaring an emergency and posting a Recommended Draft Policy on the PPML for discussion for a minimum of 14 days. The Advisory Council will review the Recommended Draft Policy within 7 days of the end of the discussion period and make a recommendation to the Board of Trustees. If the Board of Trustees adopts the policy, it will be presented at the next Public Policy Meeting for reconsideration.

### **10.2 Policy Suspension**

If, after a policy has been adopted, the Board receives credible information that a policy is flawed in such a way that it may cause significant problems if it continues to be followed, the Board of Trustees may suspend the policy and request a recommendation from the AC on how to proceed. The recommendation of the AC will be published for discussion on the PPML for a period of at least 14 days. The Board of Trustees will review the AC's recommendation and the PPML

discussion. If suspended, the policy will be presented at the next scheduled Public Policy Meeting in accordance with the procedures outlined in this document.

## **PART THREE – PDP PETITION PROCESS**

This section provides the details of the petitions within the Policy Development Process. Petitions can be made at points where decisions are made in the policy process. Points where petitions are available are depicted on the main PDP flow diagram in Appendix A. All "days" in the process below are calendar days.

### **1. Petition Principles**

#### **1.1. Available to the community**

Any member of the community may initiate a petition if they are dissatisfied with a specific action taken by the ARIN Advisory Council (AC) regarding a Policy Proposal, Draft Policy or Recommended Draft Policy. The petitioner does not have to be located in the ARIN region or associated with an organization that is a Member of ARIN; any party (including a Policy Proposal originator) with interest in policy development matters within the ARIN region may initiate a petition.

Notwithstanding the above, ARIN Staff and ARIN Board of Trustees members may not initiate or be counted in support of petitions as these individuals already have a formally defined role in the Policy Development Process.

#### **1.2. Petition Initiation and Process**

A petition may be initiated by sending an email message to the ARIN Public Policy Mailing List (PPML) clearly requesting a petition against a specific action as listed below and including a statement to the community on why the petition is warranted. ARIN Staff will confirm the validity of the petition and then announce the start of the petition period on the PPML mailing list.

Until the close of the petition period, members of the community (as allowed to petition per 1.1 above) may be counted in support for an existing petition by sending an email message to the PPML clearly stating their support for the petition. Only one petition will be considered for a given policy action; all subsequent requests to petition for the same action within the petition period shall be considered as support for the original petition.

The petition shall remain open for 5 days, at which time the ARIN Staff shall determine if the petition succeeds (a successful petition requires expressions of petition support from at least 10 different people from 10 different organizations unless otherwise specified.) A successful petition will result in a change of status for the Policy Proposal or Draft Policy as specified below.

Staff and legal reviews will be conducted and published for Draft Policies that result from successful petitions.

Successfully petitioned Draft Policies are presented for community consideration at the next Public Policy Meeting (or at an earlier scheduled Public Policy Consultation if desired) by an individual chosen by the petition supporters, with preference given to the proposal originator. If consensus is not achieved in determining the presenter, then the President may facilitate the selection process.

## **2. Valid Petitions**

Petitions may be made regarding specific actions against Policy Proposals, Draft Policies, and Recommended Draft Policies as described below.

### **2.1. Petition against Abandonment, Delay, or Rejection due to Scope**

The Advisory Council's decision to abandon a Policy Proposal, Draft Policy or Recommended Draft Policy may be petitioned.

Petitions may be initiated within the 5 days following the announcement date of an Advisory Council abandonment of a specific Policy Proposal or any Draft Policy. For sake of clarity, the "announcement date" of an action shall be the publication date of the action in the ARIN AC draft minutes. Additionally, Policy Proposals that have not been accepted as a Draft Policy after 60 days may also be petitioned to Draft Policy status at anytime.

For a Policy Proposal that has been rejected due to being out of scope of the PDP, a successful petition will refer the question of whether the Policy Proposal is in scope to the ARIN Board of Trustees for consideration.

For all other petitions against abandonment or delay, a successful petition will result in the Draft Policy being placed back on the Advisory Council docket under control of the petitioner and scheduled for public policy consultation at the next PPM. After the public consultation, control returns to the Advisory Council and subsequently may be revised or abandoned per the normal Policy Development Process.

### **2.2. Petition for Recommended Status**

Any member of the community may initiate a Petition for Recommended Status if they believe that a Draft Policy (either the original version as proposed or the current version) is fully developed to meet the requirements of Recommended Draft Policy, and the Advisory Council has not advanced the Draft Policy to Recommended Draft Policy status after 90 days as a Draft Policy.

A successful petition for Recommended Status requires expressions of petition support from at least 15 different people from 15 different organizations. If successful, the petition will result in the Draft Policy being put under control of the petitioner, advanced to Recommended Draft status, and scheduled for public policy consultation at the next PPM. The resulting Recommended Draft Policy shall be under control of the Advisory Council after the public policy consultation and subsequently may be revised or abandoned per the normal Policy Development Process.

### **2.3. Petition for Last Call**

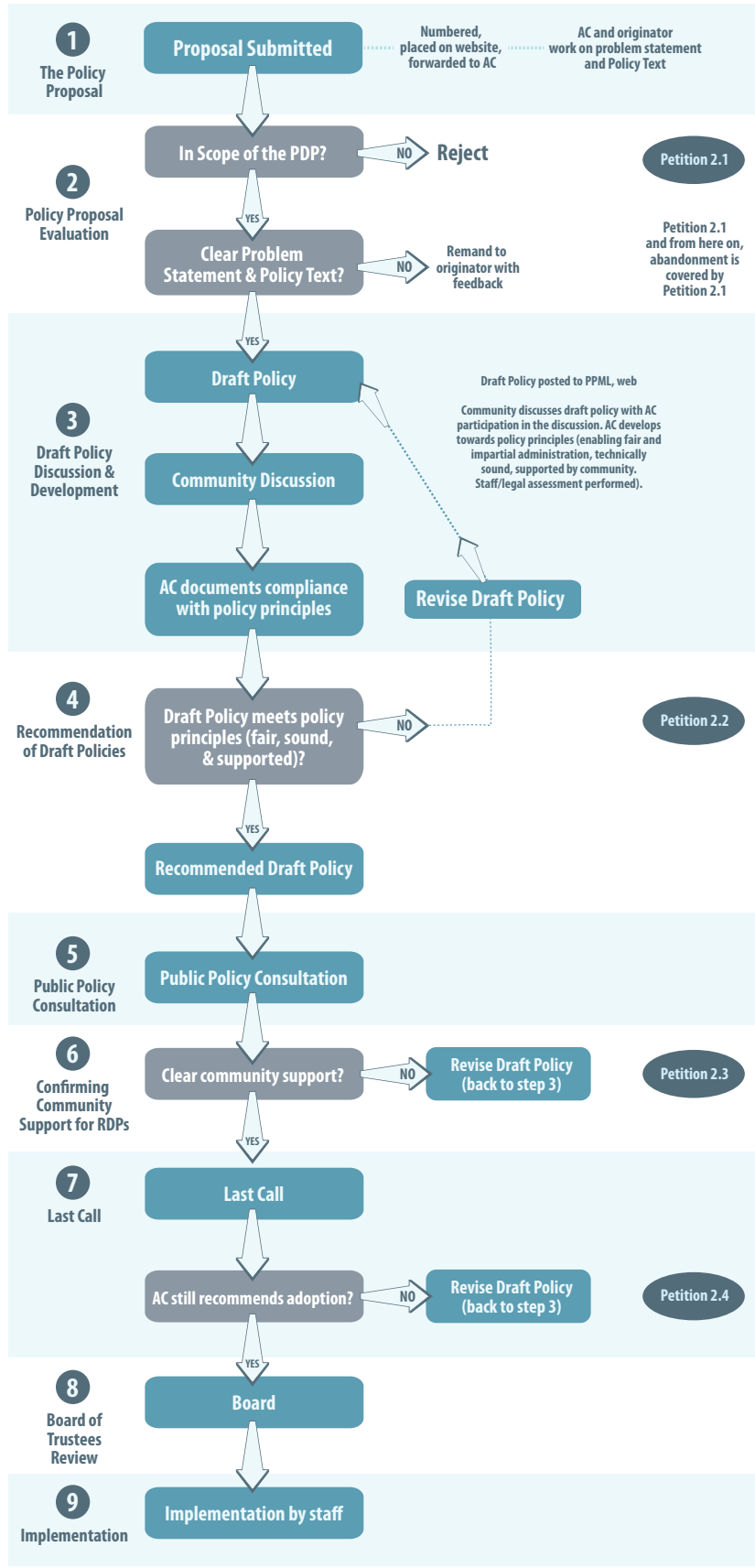
Any member of the community may initiate a Last Call Petition if they are dissatisfied with the Advisory Council's failure to act within the allotted time (60 days) to advance a Recommended Draft Policy as presented during public policy consultation to last call. A successful Petition for Last Call requires expressions of petition support from at least 20 different people from 20 different organizations. If successful, the petition will move the Recommended Draft Policy as presented during its Public Policy Consultation to last call

discussion and review by the community on the PPML. The Recommended Draft Policy shall be under the control of the Advisory Council after Last Call.

#### **2.4. Petition for Board of Trustees Consideration**

Any member of the community may initiate a Board of Trustees Consideration Petition if they are dissatisfied with the Advisory Council's failure to act within the allotted time (60 days) to send a Recommended Draft Policy in last call to the Board of Trustees for consideration. A successful petition for Board of Trustees Consideration requires expressions of petition support from at least 25 different people from 25 different organizations. If successful, this petition will send the Recommended Draft Policy from last call to the Board of Trustees for consideration.

# Policy Development Process Flow Chart



# ARIN's Number Resource Policy Manual (NRPM)

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Version 2019.1 – 7 March 2019

This is ARIN's Number Resource Policy Manual (NRPM). It is available at: <https://www.arin.net/policy/>. This version supersedes all previous versions.

Number resource policies in the ARIN region are created in accordance with the "Policy Development Process" (<https://www.arin.net/policy/pdp.html>). The status of current and historical policy proposals can be found on the "Draft Policies and Proposals" page (<https://www.arin.net/policy/proposals/>).

Each policy consists of a number of component parts separated by dots. The first figure to the far left and preceding the first dot (.), refers to the chapter number. The figure following the first dot indicates a policy section. Any subsequent figures are for the purpose of identifying specific parts of a given policy.

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## Appendix A - Change Log

## **1. Principles and Goals of the American Registry for Internet Numbers (ARIN)**

### **1.1. Registration**

The principle of registration guarantees the uniqueness of Internet number resources. Provision of this public registry documenting Internet number resource allocation, reallocation, assignment, and reassignment is necessary:

- a. to ensure uniqueness,
- b. to provide a contact in case of operational/security problems,
- c. to provide the transparency required to ensure that Internet number resources are efficiently utilized, and
- d. to assist in IP allocation studies.

### **1.2. Conservation**

The principle of conservation guarantees sustainability of the Internet through efficient utilization of unique number resources.

Due to the requirement for uniqueness, Internet number resources of each type are drawn from a common number space. Conservation of these common number spaces requires that Internet number resources be efficiently distributed to those organizations who have a technical need for them in support of operational networks.

### **1.3. Routability**

The principle of routability guarantees that Internet number resources are managed in such a manner that they may be routed on the Internet in a scalable manner.

While routing scalability is necessary to ensure proper operation of Internet routing, allocation or assignment of Internet number resources by ARIN in no way guarantees that those addresses will be routed by any particular network operator.

### **1.4. Stewardship**

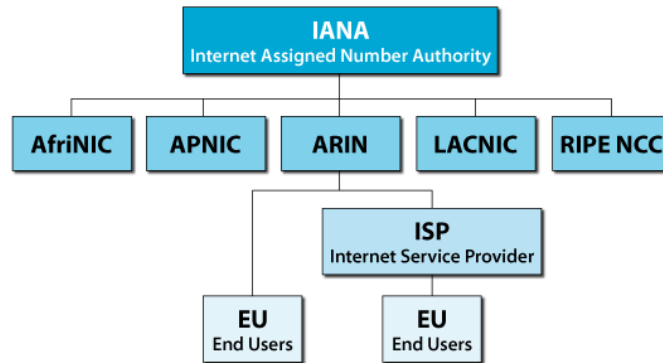
The principle of stewardship guarantees the application of these principles when managing Internet number resources.

The fundamental purpose of Internet number stewardship is to distribute unique number resources to entities building and operating networks thereby facilitating the growth and sustainability of the Internet for the benefit of all.

It should be noted that the above goals may sometimes be in conflict with each other and with the interests of individual end-users or network operators. Care must be taken to ensure balance with these conflicting goals given the resource availability, relative size of the resource, and number resource specific technical dynamics, for each type of number resource.

## **2. Definitions**

Responsibility for management of address spaces is distributed globally in accordance with the hierarchical structure shown below.



## 2.1. Internet Registry (IR)

An Internet Registry (IR) is an organization that is responsible for distributing IP address space to its members or customers and for registering those distributions.

## 2.2. Regional Internet Registry (RIR)

Regional Internet Registries (RIRs) are established and authorized by respective regional communities, and recognized by the IANA to serve and represent large geographical regions. The primary role of RIRs is to manage and distribute public Internet address space within their respective regions.

## 2.3. [Retired]

## 2.4. Local Internet Registry (LIR)

A Local Internet Registry (LIR) is an IR that primarily assigns address space to the users of the network services that it provides. LIRs are generally Internet Service Providers (ISPs), whose customers are primarily end users and possibly other ISPs.

## 2.5. Allocation, Assignment, Reallocation, Reassignment

Allocation - Address space delegated to an organization directly by ARIN for the purpose of subsequent distribution by the recipient organization to other parties.

Assignment - Address space delegated to an organization directly by ARIN for the exclusive use of the recipient organization.

Reallocation - Address space sub-delegated to an organization by an upstream provider for the purpose of subsequent distribution by the recipient organization to other parties.

Reassignment - Address space sub-delegated to an organization by an upstream provider for the exclusive use of the recipient organization.

Note that the incidental or transient use of address space by third parties shall not be considered a reassignment or a violation of the exclusive use criterion.

## **2.6. End-user**

An end-user is an organization receiving assignments of IP addresses exclusively for use in its operational networks.

## **2.7. Multihomed**

An organization is multihomed if it receives full-time connectivity from more than one ISP and has one or more routing prefixes announced by at least two of its upstream ISPs.

## **2.8., 2.9. [Retired]**

## **2.10. End Site**

The term End Site shall mean a single structure or service delivery address, or, in the case of a multi-tenant structure, a single tenant within said structure (a single customer location).

## **2.11. Community Network**

A community network is deployed, operated, and governed by its users, for the purpose of providing free or low-cost connectivity to the community it services. Users of the network or other volunteers must play a primary role in the governance of the organization, whereas other functions may be handled by either paid staff or volunteers.

## **2.12. Organizational Information**

When required, organization Information must include at a minimum: Legal name, street address, city, state, zip code equivalent and at least one valid technical and one valid abuse POC. Each POC shall be designated by the organization and must include at least a verifiable email address and phone number.

## **2.13. Residential Customer**

End-users who are individual persons and not organizations and who receive service at a place of residence for personal use only are considered residential customers.

## **2.14. Serving Site (IPv6)**

When applied to IPv6 policies, the term serving site shall mean a location where an ISP terminates or aggregates customer connections, including, but, not limited to Points of Presence (POPs), Datacenters, Central or Local switching office or regional or local combinations thereof.

## **2.15. Provider Assignment Unit (IPv6)**

When applied to IPv6 policies, the term "provider assignment unit" shall mean the prefix of the smallest block a given ISP assigns to end sites (recommended /48).

## **2.16. Utilized (IPv6)**

The term utilized shall have the following definitions when applied to IPv6 policies:

1. A provider assignment unit shall be considered fully utilized when it is assigned to an end-site.
2. Larger blocks shall have their utilization defined by dividing the number of provider assignment units assigned from the containing block by the total number of provider assignment units. This ratio will often be expressed as a percentage (e.g.  $a/t \times 100$ , for a  $/36\ 3072/4096 \times 100 = 75\%$  utilization)

### **3. Directory Services**

#### **3.1. Bulk Copies of ARIN's Whois**

ARIN will provide a bulk copy of Whois output, including point of contact information, on the ARIN site for download by any organization that wishes to obtain the data providing they agree to ARIN's acceptable use policy. This point of contact information will not include data marked as private.

[The Request Form for ARIN Bulk Whois Data, which contains the Acceptable Use Policy (AUP) for Bulk Copies of ARIN Whois Data, can be found at:

<https://www.arin.net/resources/agreements/bulkwhois.pdf>

#### **3.2. Distributed Information Service Use Requirements**

The minimal requirements for an organization to setup a distributed information service to advertise reassignment and reallocation information are:

- The distributed information service must be operational 24 hours a day, 7 days a week to both the general public and ARIN staff. The service is allowed reasonable downtime for server maintenance according to generally accepted community standards.
- The distributed information service must allow public access to reassignment and reallocation information. The service may restrict the number of queries allowed per time interval from a host or subnet to defend against DDOS attacks, remote mirroring attempts, and other nefarious acts.
- The distributed information service must return reassignment and reallocation information for the IP address queried. The service may allow for privacy protections for customers. For residential users, the service may follow ARIN's residential privacy policy that includes displaying only the city, state, zip code, and country. For all other reassignments and reallocations, the service shall follow ARIN's privacy policy for publishing data in a public forum.
- The distributed information service may return results for non-IP queries.
- The distributed information service must respond to a query with the minimal set of attributes per object as defined by ARIN staff.
- The distributed information service may include optional attributes per object that are defined locally. The distributed information service must return results that are up-to-date on reassignment and reallocation information.

#### **3.3. Privatizing POC Information**

Organizations may designate certain points of contact as private from ARIN Whois, with the exception that, at the minimum, one point of contact must be viewable.

#### **3.4. Routing Registry**

### **3.4.1. Acceptable Use Policy**

- The ARIN Routing Registry data is for Internet operational purposes only. Mirroring is only allowed by other routing registries.
- The user may only distribute this data using a Whois service unless prior, written permission from ARIN has been obtained.
- To protect those registered in the ARIN routing registry, ARIN may need to specify additional conditions on access permissions for this data in the future. The permission to access the data is based on agreement to the conditions stipulated in this document in addition to any others that may be added in the future.
- Please see the <http://www.irr.net/docs/list.html> URL for information about the replicated Routing Registry data.

## **3.5. Autonomous System Originations**

### **3.5.1. Collection**

ARIN will collect an optional field in all IPv4 and IPv6 address block transactions (allocation and assignment requests, reallocation and reassignment actions, transfer and experimental requests). This additional field will be used to record a list of the ASes that the user permits to originate address prefixes within the address block.

### **3.5.2. Publication**

#### **3.5.2.1. Description of Data**

ARIN will produce a collection of the mappings from address blocks to ASes permitted to originate that address block. The collection will consist of a list where each entry will consist, at a minimum, of an address block, a list of AS numbers, and a tag indicating the type of delegation of the address block. This collection will be produced at least daily.

#### **3.5.2.2. Bulk Publication of Data**

ARIN will make the collected mappings from address blocks to AS numbers available for bulk transfer in one or more formats chosen at its own discretion, informed by the community's current needs. This data will not be subject to any redistribution restrictions -- it may be republished or repackaged in any form. Should ARIN choose to use Whois bulk transfer as the bulk form of data access required by this paragraph, the address block to AS mappings will not be subject to any redistribution restrictions, but the remainder of the Whois data will remain subject to the terms of the then-current AUP regarding bulk access to Whois data.

#### **3.5.2.3. Other Formats**

ARIN may also make the collected or individual mappings from address blocks to AS numbers available in other forms, possibly query services, chosen at its own discretion, informed by the community's current needs. ARIN may require agreement to an acceptable use policy for access to the data in these forms.

## **3.6. Annual Validation of ARIN's Public Whois Point of Contact Data**

### **3.6.1. Annual POC Verification**

ARIN will perform an annual verification of specific Points of Contact registered in the public Whois using the criteria and procedures outlined in sections 3.6.2, 3.6.3, and 3.6.4.

### **3.6.2. Specified Public Whois Points of Contact for Verification**

Each of the following Points of Contact are to be verified annually, and will be referred to as Point of Contact or POC throughout this policy, and should be understood to be both organization and resource POCs:

- Admin
- Tech
- NOC
- Abuse

### **3.6.3. Organizations Covered by this Policy**

This policy applies to every Organization that has a direct assignment, direct allocation, or AS number from ARIN (or one of its predecessor registries) or a reallocation from an upstream ISP. This includes but is not limited to upstream ISPs and their downstream ISP customers (as defined by NRPM 2.5 and 2.6), but not reassignments made to their downstream end user customers.

### **3.6.4. Procedure for Verification**

An annual email notification will be sent to each of the Points of Contact outlined in section 3.6.2 on an annual basis. Each Point of Contact will have up to sixty (60) days from the date of the notification in which to respond with an affirmative that their Whois contact information is correct and complete or to submit new data to correct and complete it. If after careful analysis, ARIN staff deems a POC to be completely and permanently abandoned or otherwise illegitimate, the POC record shall be marked invalid in Whois.

### **3.6.5. Non-Responsive Point of Contact Records**

An invalid POC is restricted to payment and contact update functionality within ARIN Online. As a result, an organization without any valid POCs will be unable to access further functionalities within ARIN Online until at least one Admin or Tech POC validates that their information is accurate or modifies a POC to contain accurate information.

## **4. IPv4**

### **4.1. General Principles**

**4.1.1., 4.1.2., 4.1.3., 4.1.4. [Retired]**

### **4.1.5. Resource Request Size**

Determining the validity of the amount of requested IP address resources is the responsibility of ARIN.

### **4.1.6. Aggregation**



In order to preserve aggregation, ARIN attempts to issue blocks of addresses on appropriate "CIDR-supported" bit boundaries. ARIN may reserve space to maximize aggregation possibilities until the implementation of section 10.4.2.2, at which time ARIN will make each allocation and assignment as a single continuous range of addresses.

#### **4.1.7. [Retired]**

#### **4.1.8. Unmet Requests**

In the event that ARIN does not have a contiguous block of addresses of sufficient size to fulfill a qualified request, ARIN will provide the requesting organization with the option to specify the smallest block size they'd be willing to accept, equal to or larger than the applicable minimum size specified elsewhere in ARIN policy. If such a smaller block is available, ARIN will fulfill the request with the largest single block available that fulfills the request. If no such block is available, the organization will be provided the option to be placed on a waiting list of pre-qualified recipients, listing both the block size qualified for and the smallest block size acceptable.

Repeated requests, in a manner that would circumvent 4.1.6, are not allowed: an organization may only receive one allocation, assignment, or transfer every 3 months, but ARIN, at its sole discretion, may waive this requirement if the requester can document a change in circumstances since their last request that could not have been reasonably foreseen at the time of the original request, and which now justifies additional space. Qualified requesters whose request cannot be immediately met will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

##### **4.1.8.1. Waiting List**

The position of each qualified request on the waiting list will be determined by the date it was approved. Each organization may have one approved request on the waiting list at a time.

##### **4.1.8.2. Fulfilling Unmet Needs**

As address blocks become available for allocation, ARIN will fulfill requests on a first-approved basis, subject to the size of each available address block and a timely re-validation of the original request. Requests will not be partially filled. Any requests met through a transfer will be considered fulfilled and removed from the waiting list.

#### **4.1.9. [Retired]**

### **4.2. Allocations to ISPs (Requirements for Requesting Initial Address Space)**

#### **4.2.1. Principles**

##### **4.2.1.1. Purpose**

ARIN allocates blocks of IP addresses to ISPs for the purpose of reassigning and reallocating that space to their customers.

##### **4.2.1.2. Annual Renewal**

An annual fee for registered space is due by the anniversary date of the ISP's first allocation from ARIN. ISPs should take care to ensure that their annual renewal payment is made by their anniversary due date in accordance with the Registration Services Agreement. If not paid by the anniversary date, the address space may be revoked. Please review the Annual Renewal/Maintenance Fees Page for more details.

#### **4.2.1.3. Utilization Rate**

Utilization rate of address space is a key factor, among others, in determining address allocation.

#### **4.2.1.4. Slow Start**

Because the number of available IP addresses on the Internet is limited, many factors must be considered in the determination of address space allocations. Therefore, IP address space is allocated to ISPs using a slow-start model. Allocations are based on justified need, not solely on a predicted customer base.

#### **4.2.1.5. Minimum Allocation**

In general, ARIN allocates /24 and larger IP address prefixes to ISPs. If allocations smaller than /24 are needed, ISPs should request address space from their upstream provider.

#### **4.2.1.6. [Retired]**

### **4.2.2. Initial Allocation to ISPs**

All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /21, subject to ARIN's minimum allocation size. Organizations may qualify for a larger initial allocation by documenting how the requested allocation will be utilized within 24 months. ISPs renumbering out of their previous address space will be given a reasonable amount of time to do so, and any blocks they are returning will not count against their utilization.

### **4.2.3. Reassigning and Reallocating Address Space to Customers**

#### **4.2.3.1. Efficient Utilization**

ISPs are required to apply a utilization efficiency criterion in providing address space to their customers. To this end, ISPs should have documented justification available for each reassignment and reallocation. ARIN may request this justification at any time. If justification is not provided, future receipt of allocations may be impacted.

#### **4.2.3.2. VLSM**

To increase utilization efficiency of IPv4 address space, ISPs reassigning IP address space to their customers should require their customers to use variable length subnet mask (VLSM) and classless technologies (CIDR) within their networks. ISPs should issue blocks smaller than /24 wherever feasible.

#### **4.2.3.3. Contiguous Blocks**

IP addresses are allocated to ISPs in contiguous blocks, which should remain intact. Fragmentation of blocks is discouraged. To avoid fragmentation, ISPs are encouraged to require their customers to return address space if they change ISPs. Therefore, if a customer moves to another service provider or otherwise terminates a contract with an ISP, it is recommended that the customer return the network addresses to the ISP and renumber into the new provider's address space. The original ISP should allow sufficient time for the renumbering process to be completed before requiring the address space to be returned.

#### **4.2.3.4. Downstream Customer Adherence**

ISPs must require their downstream customers to adhere to the following criteria:

##### **4.2.3.4.1. Utilization**

Reassignment and reallocation information for prior allocations must show that each customer meets the 80% utilization criteria and must be available via SWIP / a distributed service which meets the standards set forth in section 3.2 prior to your issuing them additional space.

##### **4.2.3.4.2. Downstream ISPs**

Customers must follow ARIN policy for ISPs.

##### **4.2.3.5. [Retired]**

##### **4.2.3.6. Reassignments to Multihomed Downstream Customers**

Under normal circumstances an ISP is required to determine the prefix size of their reassignment to a downstream customer according to the guidelines set forth in RFC 2050. Specifically, a downstream customer justifies their reassignment by demonstrating they have an immediate requirement for 25% of the IP addresses being assigned, and that they have a plan to utilize 50% of their assignment within one year of its receipt. This policy allows a downstream customer's multihoming requirement to serve as justification for a /24 reassignment from their upstream ISP, regardless of host requirements. Downstream customers must provide contact information for all of their upstream providers to the ISP from whom they are requesting a /24. The ISP will then verify the customer's multihoming requirement and may assign the customer a /24, based on this policy. Customers may receive a /24 from only one of their upstream providers under this policy without providing additional justification. ISPs may demonstrate they have made an assignment to a downstream customer under this policy by supplying ARIN with the information they collected from the customer, as described above, or by identifying the AS number of the customer. This information may be requested by ARIN staff when reviewing an ISP's utilization during their request for additional IP addresses space.

##### **4.2.3.7. Registration**

ISPs are required to demonstrate efficient use of IP address space allocations by providing appropriate documentation, including but not limited to assignment histories, showing their efficient use.

##### **4.2.3.7.1. Reassignment and Reallocation Information**

Each IPv4 reassignment or reallocation containing a /29 or more addresses shall be registered in the WHOIS directory via SWIP or a distributed service which meets the standards set forth in section 3.2. Reassignment and reallocation registrations shall include each client's organizational information, except where specifically exempted by this policy.

#### **4.2.3.7.2. Reassignments and Reallocations Visible Within Seven Days**

All reassignments and reallocations shall be made visible as required in section 4.2.3.7.1 within seven calendar days of reassignment or reallocation.

#### **4.2.3.7.3. Residential Subscribers**

##### **4.2.3.7.3.1. [Retired]**

##### **4.2.3.7.3.2. Residential Customer Privacy**

To maintain the privacy of their residential customers, an organization with downstream residential customers holding /29 and larger blocks may substitute that organization's name for the customer's name, e.g. 'Private Customer - XYZ Network', and the customer's street address may read 'Private Residence'. Each private downstream residential reassignment must have accurate upstream Abuse and Technical POCs visible on the WHOIS or Distributed Information Service record for that block.

#### **4.2.3.8. Reassignments for Third Party Internet Access (TPIA) over Cable**

IP addresses reassigned by an ISP to an incumbent cable operator for use with Third Party Internet Access (TPIA) will be counted as fully used once they are assigned to equipment by the underlying cable carrier provided they meet the following requirements:

- initial assignments to each piece of hardware represent the smallest subnet reasonably required to deploy service to the customer base served by the hardware
- additional assignments to each piece of hardware are made only when all previous assignments to that specific piece of hardware are at least 80% used and represent a 24 month supply
- IP allocations issued through 4.2.3.8 are non-transferable via section 8.3 and section 8.4 for a period of 36 months. In the case of a section 8.2 transfer the IP assignment must be utilized for the same purpose or needs based justification at a rate consistent with intended use.

#### **4.2.4. ISP Additional Requests**

##### **4.2.4.1. Utilization Percentage (80%)**

ISPs must have efficiently utilized all allocations, in aggregate, to at least 80% and at least 50% of every allocation in order to receive additional space. This includes all space reassigned or reallocated to their customers.

##### **4.2.4.2. Return Address Space as Agreed**

Return prior address space designated for return as agreed.

##### **4.2.4.3. Request Size**

ISPs may request up to a 24-month supply of IPv4 addresses.

#### **4.2.4.4. [Retired]**

#### **4.2.5., 4.2.6. [Retired]**

### **4.3. End-users - Assignments to End-users**

#### **4.3.1. End-users**

ARIN assigns blocks of IP addresses to end-users who request address space for their internal use in running their own networks, but not for sub-delegation of those addresses outside their organization. End-users must meet the requirements described in these guidelines for justifying the assignment of an address block.

#### **4.3.2. Minimum Assignment**

ARIN's minimum assignment for end-user organizations is a /24.

End-user organizations without direct assignments or allocations from ARIN qualify for an initial assignment of ARIN's minimum assignment size.

#### **4.3.3. Utilization Rate**

Organizations may qualify for a larger initial allocation by providing appropriate details to verify their 24-month growth projection.

The basic criterion that must be met is a 50% utilization rate within 24 months.

A greater utilization rate may be required based on individual network requirements.

#### **4.3.4. Additional Considerations**

End-users may qualify for address space under other policies such as Micro-allocation [\[4.4\]](#).

#### **4.3.5. Non-connected Networks**

End-users not currently connected to an ISP and/or not planning to be connected to the Internet are encouraged to use private IP address numbers reserved for non-connected networks (see RFC 1918). When private, non-connected networks require interconnectivity and the private IP address numbers are ineffective, globally unique addresses may be requested and used to provide this interconnectivity.

#### **4.3.6. Additional Assignments**

##### **4.3.6.1. Utilization Requirements for Additional Assignment**

End-users must have efficiently utilized all assignments, in aggregate, to at least 80% and at least 50% of every assignment in order to receive additional space, and must provide ARIN with utilization details.

#### 4.4. Micro-allocation

ARIN will make IPv4 micro-allocations to critical infrastructure providers of the Internet, including public exchange points, core DNS service providers (e.g. ICANN-sanctioned root and ccTLD operators) as well as the RIRs and IANA. These allocations will be no smaller than a /24. Multiple allocations may be granted in certain situations.

Exchange point allocations MUST be allocated from specific blocks reserved only for this purpose. All other micro-allocations WILL be allocated out of other blocks reserved for micro-allocation purposes. ARIN will make a list of these blocks publicly available.

Exchange point operators must provide justification for the allocation, including: connection policy, location, other participants (minimum of three total), ASN, and contact information. ISPs and other organizations receiving these micro-allocations will be charged under the ISP fee schedule, while end-users will be charged under the fee schedule for end-users. This policy does not preclude exchange point operators from requesting address space under other policies.

ARIN will place an equivalent of a /15 of IPv4 address space in a reserve for Critical Infrastructure, as defined in section 4.4.

ICANN-sanctioned gTLD operators may justify up to the equivalent of an IPv4 /23 block for each authorized new gTLD, allocated from the free pool or received via transfer, but not from the above reservation. This limit of a /23 equivalent per gTLD does not apply to gTLD allocations made under previous policy.

#### 4.5. Multiple Discrete Networks

Organizations with multiple discrete networks desiring to request new or additional address space under a single Organization ID must meet the following criteria:

1. The organization shall be a single entity and not a consortium of smaller independent entities.
2. The organization must have compelling criteria for creating discrete networks. Examples of a discrete network might include:
  1. Regulatory restrictions for data transmission,
  2. Geographic distance and diversity between networks,
  3. Autonomous multihomed discrete networks.
3. The organization must keep detailed records on how it has allocated space to each location, including the date of each allocation.
4. When applying for additional internet address registrations from ARIN, the organization must demonstrate utilization greater than 50% of both the last block allocated and the aggregate sum of all blocks allocated from ARIN to that organization. If an organization is unable to satisfy this 50% minimum utilization criteria, the organization may alternatively qualify for additional internet address registrations by having all unallocated blocks of addresses smaller than ARIN's current minimum allocation size.
5. The organization may not allocate additional address space to a location until each of that location's address blocks are 80% utilized.
6. The organization should notify ARIN at the time of the request their desire to apply this policy to their account.
7. Upon verification that the organization has shown evidence of deployment of the new discrete network site, the new network(s) shall be allocated the minimum allocation size under section 4.2.1.5.

#### **4.6., 4.7., 4.8., 4.9. [Retired]**

#### **4.10. Dedicated IPv4 block to Facilitate IPv6 Deployment**

When ARIN receives its last /8 IPv4 allocation from IANA, a contiguous /10 IPv4 block will be set aside and dedicated to facilitate IPv6 deployment. Allocations and assignments from this block must be justified by immediate IPv6 deployment requirements. Examples of such needs include: IPv4 addresses for key dual stack DNS servers, and NAT-PT or NAT464 translators. ARIN staff will use their discretion when evaluating justifications.

This block will be subject to a minimum size allocation of /28 and a maximum size allocation of /24. ARIN should use sparse allocation when possible within that /10 block.

In order to receive an allocation or assignment under this policy:

1. the applicant may not have received resources under this policy in the preceding six months;
2. previous allocations/assignments under this policy must continue to meet the justification requirements of this policy;
3. previous allocations/assignments under this policy must meet the utilization requirements of end user assignments;
4. the applicant must demonstrate that no other allocations or assignments will meet this need;
5. on subsequent allocation under this policy, ARIN staff may require applicants to renumber out of previously allocated / assigned space under this policy in order to minimize non-contiguous allocations.

#### **5. AS Numbers**

There are a limited number of available Autonomous System Numbers (AS Numbers), therefore, it is important to determine which sites require unique AS Numbers and which do not. Sites that do not require a unique AS Number should use one or more of the AS Numbers reserved for private use. Those numbers are: 64512 through 65534 and 4200000000 through 4294967294 inclusive.

In order to be assigned an AS Number, each requesting organization must provide ARIN with verification that it has one of the following:

1. A unique routing policy (its policy differs from its border gateway peers)
2. A multihomed site.

AS Numbers are issued based on current need. An organization should request an AS Number only when it is already multihomed or will immediately become multihomed.

#### **5.1. [Retired]**

### **6. IPv6**

#### **6.1. Introduction**

##### **6.1.1. Overview**

This document describes policies for the allocation and assignment of globally-unique Internet Protocol Version 6 (IPv6) address space. It updates and obsoletes the existing Provisional IPv6 Policies in effect since 1999. Policies described in this document are intended to be adopted by each registry. However, adoption of this document does not preclude local variations in each region or area.

RFC 2373, RFC 2373bis designate 2000::

## **6.2. [Retired]**

## **6.3. Goals of IPv6 Address Space Management**

### **6.3.1. Goals**

IPv6 address space is a public resource that must be managed in a prudent manner with regards to the long-term interests of the internet. Responsible address space management involves balancing a set of sometimes competing goals. The following are the goals relevant to IPv6 address policy.

### **6.3.2. Uniqueness**

Every assignment and/or allocation of address space must guarantee uniqueness worldwide. This is an absolute requirement for ensuring that every public host on the Internet can be uniquely identified.

### **6.3.3. Registration**

Internet address space must be registered in a registry database accessible to appropriate members of the Internet community. This is necessary to ensure the uniqueness of each Internet address and to provide reference information for Internet troubleshooting at all levels, ranging from all RIRs and IRs to end users.

The goal of registration should be applied within the context of reasonable privacy considerations and applicable laws.

### **6.3.4. Aggregation**

Wherever possible, address space should be distributed in a hierarchical manner, according to the topology of network infrastructure. This is necessary to permit the aggregation of routing information by ISPs, and to limit the expansion of Internet routing tables.

This goal is particularly important in IPv6 addressing, where the size of the total address pool creates significant implications for both internal and external routing.

IPv6 address policies should seek to avoid fragmentation of address ranges.

Further, RIRs should apply practices that maximize the potential for subsequent allocations to be made contiguous with past allocations currently held. However, there can be no guarantee of contiguous allocation.



### **6.3.5. Conservation**

Although IPv6 provides an extremely large pool of address space, address policies should avoid unnecessarily wasteful practices. Requests for address space should be supported by appropriate documentation and stockpiling of unused addresses should be avoided.

### **6.3.6. Fairness**

All policies and practices relating to the use of public address space should apply fairly and equitably to all existing and potential members of the Internet community, regardless of their location, nationality, size or any other factor.

### **6.3.7. Minimized Overhead**

It is desirable to minimize the overhead associated with obtaining address space. Overhead includes the need to go back to RIRs for additional space too frequently, the overhead associated with managing address space that grows through a number of small successive incremental expansions rather than through fewer, but larger, expansions.

### **6.3.8. Conflict of Goals**

The goals described above will often conflict with each other, or with the needs of individual IRs or end users. All IRs evaluating requests for allocations and assignments must make judgments, seeking to balance the needs of the applicant with the needs of the Internet community as a whole.

In IPv6 address policy, the goal of aggregation is considered to be the most important.

## **6.4. IPv6 Policy Principles**

To address the goals described in the previous section, the policies in this document discuss and follow the basic principles described below.

### **6.4.1. Address Space Not to be Considered Property**

It is contrary to the goals of this document and is not in the interests of the Internet community as a whole for address space to be considered freehold property.

The policies in this document are based upon the understanding that globally-unique IPv6 unicast address space is allocated/assigned for use rather than owned.

### **6.4.2. Routability Not Guaranteed**

There is no guarantee that any address allocation or assignment will be globally routable.

However, RIRs must apply procedures that reduce the possibility of fragmented address space which may lead to a loss of routability.

### **6.4.3. [Retired]**

#### 6.4.4. Consideration of IPv4 Infrastructure

Where an existing IPv4 service provider requests IPv6 space for eventual transition of existing services to IPv6, the number of present IPv4 customers may be used to justify a larger request than would be justified if based solely on the IPv6 infrastructure.

### 6.5. Policies for Allocations and Assignments

#### 6.5.1. Terminology

- a. The terms ISP and LIR are used interchangeably in this document and any use of either term shall be construed to include both meanings.
- b. The term nibble boundary shall mean a network mask which aligns on a 4-bit boundary (in slash notation, /n, where n is evenly divisible by 4, allowing unit quantities of X such that  $2^n=X$  where n is evenly divisible by 4, such as 16, 256, 4096, etc.)

#### 6.5.2. Initial allocation to LIRs

##### 6.5.2.1. Size

- a. All allocations shall be made on nibble boundaries.
- b. In no case shall an LIR receive smaller than a /32 unless they specifically request a /36. In no case shall an ISP receive more than a /16 initial allocation.
- c. The maximum allowable allocation shall be the smallest nibble-boundary aligned block that can provide an equally sized nibble-boundary aligned block to each of the requesters serving sites large enough to satisfy the needs of the requesters largest single serving site using no more than 75% of the available addresses.

This calculation can be summarized as  $N = P - (X + Y)$  where N is the number of nibble boundaries, P is the organization's Provider Allocation Unit, X is a multiple of 4 greater than  $\frac{4}{3} \times \text{number of serving sites}$  and Y is a multiple of 4 greater than  $\frac{4}{3} \times \text{number of end sites served by largest serving site}$ .

- d. For purposes of the calculation in (c), an end site which can justify more than a /48 under the end-user assignment criteria in 6.5.8 shall count as the appropriate number of /48s that would be assigned under that policy.
- e. For purposes of the calculation in (c), an LIR which has subordinate LIRs shall make such reallocations according to the same policies and criteria as ARIN. In such a case, the prefixes necessary for such a reallocation should be treated as fully utilized in determining the block sizing for the parent LIR. LIRs which do not receive resources directly from ARIN will not be able to make such reallocations to subordinate LIRs and subordinate LIRs which need more than a /32 shall apply directly to ARIN.
- f. An LIR is not required to design or deploy their network according to this structure. It is strictly a mechanism to determine the largest IP address block to which the LIR is entitled.

##### 6.5.2.2. Qualifications

An organization qualifies for an allocation under this policy if they meet any of the following criteria:

- a. Have a previously justified IPv4 ISP allocation from ARIN or one of its predecessor registries or can qualify for an IPv4 ISP allocation under current criteria.
- b. Are currently multihomed for IPv6 or will immediately become multihomed for IPv6 using a valid assigned global AS number.

In either case, they will be making reassignments or reallocations from allocation(s) under this policy to other organizations.

- c. Provide ARIN a reasonable technical justification indicating why an allocation is necessary. Justification must include the intended purposes for the allocation and describe the network infrastructure the allocation will be used to support. Justification must also include a plan detailing anticipated reassignments and reallocations to other organizations or customers for one, two and five year periods, with a minimum of 50 assignments within 5 years.

### **6.5.3. Subsequent Allocations to LIRs**

- a. Where possible ARIN will make subsequent allocations by expanding the existing allocation.
- b. An LIR qualifies for a subsequent allocation if they meet any of the following criteria:
  - o Shows utilization of 75% or more of their total address space
  - o Shows utilization of more than 90% of any serving site
  - o Has allocated more than 90% of their total address space to serving sites, with the block size allocated to each serving site being justified based on the criteria specified in section 6.5.2
- c. If ARIN can not expand one or more existing allocations, ARIN shall make a new allocation based on the initial allocation criteria above. The LIR is encouraged, but not required to renumber into the new allocation over time and return any allocations no longer in use.
- d. If an LIR has already reached a /12 or more, ARIN will allocate a single additional /12 rather than continue expanding nibble boundaries.

#### **6.5.3.1. Subsequent Allocations for Transition**

Subsequent allocations will also be considered for deployments that cannot be accommodated by, nor were accounted for, under the initial allocation. Justification for the subsequent subnet size will be based on the plan and technology provided with a /24 being the maximum allowed for a transition technology. Justification for transitional allocations will be reviewed every 3 years and reclaimed if they are no longer in use for transitional purposes. All such allocations for transitional technology will be made from a block designated for this purpose.

### **6.5.4. Reassignments from LIRs/ISPs**

Reassignments to end users shall be governed by the same practices adopted by the community in section 6.5.8 except that the requirements in 6.5.8.1 do not apply.

#### **6.5.4.1. Reassignment to Operator's Infrastructure**

An LIR may reassign up to a /48 per PoP as well as up to an additional /48 globally for its own infrastructure.

### **6.5.5. Registration**

ISPs are required to demonstrate efficient use of IP address space allocations by providing appropriate documentation, including but not limited to reassignment and reallocation histories, showing their efficient use.

#### **6.5.5.1. Reassignment Information**

Each static IPv6 reassignment or reallocation containing a /47 or more addresses, or subdelegation of any size that will be individually announced, shall be registered in the WHOIS directory via SWIP or a distributed service which meets the

standards set forth in section 3.2. Reassignment registrations shall include each client's organizational information, except where specifically exempted by this policy.

#### **6.5.5.2. Reassignments and Reallocations Visible Within Seven Days**

All reassignments and reallocations shall be made visible as required in section 6.5.5.1 within seven calendar days of reassignment or reallocation.

#### **6.5.5.3. Residential Subscribers**

##### **6.5.5.3.1. Residential Customer Privacy**

To maintain the privacy of their residential customers, an organization with downstream residential customers may substitute that organization's name for the customer's name, e.g. 'Private Customer - XYZ Network', and the customer's street address may read 'Private Residence'. Each private downstream residential reassignment must have accurate upstream Abuse and Technical POCs visible on the WHOIS or Distributed Information Service record for that block.

#### **6.5.5.4. Registration Requested by Recipient**

If the downstream recipient of a static assignment of /64 or more addresses requests publishing of that assignment in ARIN's registration database, the ISP shall register that assignment as described in section 6.5.5.1.

#### **6.5.6. [Retired]**

#### **6.5.7. Existing IPv6 Address Space Holders**

LIRs which received an allocation under previous policies which is smaller than what they are entitled to under this policy may receive a new initial allocation under this policy. If possible, ARIN will expand their existing allocation.

#### **6.5.8. Direct Assignments from ARIN to End-user Organizations**

##### **6.5.8.1. Initial Assignment Criteria**

Organizations may justify an initial assignment for addressing devices directly attached to their own network infrastructure, with an intent for the addresses to begin operational use within 12 months, by meeting one of the following criteria:

- a. Having a previously justified IPv4 end-user assignment from ARIN or one of its predecessor registries, or;
- b. Currently being IPv6 Multihomed or immediately becoming IPv6 Multihomed and using an assigned valid global AS number, or;
- c. By having a network that makes active use of a minimum of 2000 IPv6 addresses within 12 months, or;
- d. By having a network that makes active use of a minimum of 200 /64 subnets within 12 months, or;
- e. By having a contiguous network that has a minimum of 13 active sites within 12 months, or;
- f. By providing a reasonable technical justification indicating why IPv6 addresses from an ISP or other LIR are unsuitable.

Examples of justifications for why addresses from an ISP or other LIR may be unsuitable include, but are not limited to:

- An organization that operates infrastructure critical to life safety or the functioning of society can justify the need for an assignment based on the fact that renumbering would have a broader than expected impact than simply the number of hosts directly involved. These would include: hospitals, fire fighting, police, emergency response, power or energy distribution, water or waste treatment, traffic management and control, etc.
- Regardless of the number of hosts directly involved, an organization can justify the need for an assignment if renumbering would affect 2000 or more individuals either internal or external to the organization.
- An organization with a network not connected to the Internet can justify the need for an assignment by documenting a need for guaranteed uniqueness, beyond the statistical uniqueness provided by ULA (see RFC 4193).
- An organization with a network not connected to the Internet, such as a VPN overlay network, can justify the need for an assignment if they require authoritative delegation of reverse DNS.

### 6.5.8.2. Initial Assignment Size

Organizations that meet at least one of the initial assignment criteria above are eligible to receive an initial assignment of /48. Requests for larger initial assignments, reasonably justified with supporting documentation, will be evaluated based on the number of sites in an organization's network and the number of subnets needed to support any extra-large sites defined below.

The initial assignment size will be determined by the number of sites justified below. An organization qualifies for an assignment on the next larger nibble boundary when their sites exceed 75% of the /48s available in a prefix. For example:

- More than 1 but less than or equal to 12 sites justified, receives a /44 assignment;
- More than 12 but less than or equal to 192 sites justified, receives a /40 assignment;
- More than 192 but less than or equal to 3,072 sites justified, receives a /36 assignment;
- More than 3,072 but less than or equal to 49,152 sites justified, receives a /32 assignment; etc...

#### 6.5.8.2.1. Standard Sites

A site is a discrete location that is part of an organization's network. A campus with multiple buildings may be considered as one or multiple sites, based on the implementation of its network infrastructure. For a campus to be considered as multiple sites, reasonable technical documentation must be submitted describing how the network infrastructure is implemented in a manner equivalent to multiple sites.

An organization may request up to a /48 for each site in its network, and any sites that will be operational within 12 months.

#### 6.5.8.2.2. Extra-large Sites

In rare cases, an organization may request more than a /48 for an extra-large site which requires more than 16,384 /64 subnets. In such a case, a detailed subnet plan must be submitted for each extra-large site in an organization's network. An extra-large site qualifies for the next larger prefix when the total subnet utilization exceeds 25%. Each extra-large site will be counted as an equivalent number of /48 standard sites.

#### 6.5.8.3. Subsequent Assignments

Requests for subsequent assignments with supporting documentation will be evaluated based on the same criteria as an initial assignment under 6.5.8.2 with the following modifications:

- a. A subsequent assignment is justified when the total utilization based on the number of sites justified exceeds 75% across all of an organization's assignments. If the organization received an assignment per section 6.11 IPv6 Multiple Discrete Networks, such assignments will be evaluated as if they were to a separate organization.
- b. When possible subsequent assignments will result in the expansion of an existing assignment by one or more nibble boundaries as justified.
- c. If it is not possible to expand an existing assignment, or to expand it adequately to meet the justified need, then a separate new assignment will be made of the size justified.

#### **6.5.8.4. Consolidation and Return of Separate Assignments**

Organizations with multiple separate assignments should consolidate into a single aggregate, if feasible. If an organization stops using one or more of its separate assignments, any unused assignments must be returned to ARIN.

#### **6.5.9. Community Network Allocations**

While community networks would normally be considered to be ISP type organizations under existing ARIN criteria, they tend to operate on much tighter budgets and often depend on volunteer labor. As a result, they tend to be much smaller and more communal in their organization rather than provider/customer relationships of commercial ISPs. This section seeks to provide a policy that is more friendly to those environments by allowing community network to receive a smaller allocation than other LIRs or commercial ISPs.

Community networks may also qualify under section 6.5.2 as a regular LIR.

##### **6.5.9.1. Qualification Criteria**

To qualify under this section, a community network must demonstrate to ARIN's satisfaction that it meets the definition of a community network under section 2.11 of the NRPM.

##### **6.5.9.2. Allocation Size**

Community networks are eligible only to receive an allocation of /40 of IPv6 resources under this section. Community networks that wish to receive a larger initial allocation or any subsequent allocations must qualify as a regular LIR, see sections 6.5.2 or 6.5.3 respectively.

##### **6.5.9.3. Reassignments by Community Networks**

Similar to other LIRs, Community networks shall make reassignments to end-users in accordance with applicable policies, in particular, but not limited to sections 6.5.4 and 6.5.5. However, they shall not reallocate resources under this section.

#### **6.6., 6.7., 6.8., 6.9. [Retired]**

#### **6.10. Micro-allocations**

##### **6.10.1. Micro-allocations for Critical Infrastructure**

ARIN will make micro-allocations to critical infrastructure providers of the Internet, including public exchange points, core DNS service providers (e.g. ICANN-sanctioned root, gTLD, and ccTLD operators) as well as the RIRs and IANA. These

allocations will be no smaller than a /24 using IPv4 or a /48 using IPv6. Multiple allocations may be granted in certain situations. - Exchange point allocations MUST be allocated from specific blocks reserved only for this purpose. All other micro-allocations WILL be allocated out of other blocks reserved for micro-allocation purposes. ARIN will make a list of these blocks publicly available. - Exchange point operators must provide justification for the allocation, including: connection policy, location, other participants (minimum of two total), ASN, and contact information. ISPs and other organizations receiving these micro-allocations will be charged under the ISP fee schedule, while end-users will be charged under the fee schedule for end-users. This policy does not preclude exchange point operators from requesting address space under other policies.

### **6.10.2. Micro-allocations for Internal Infrastructure**

Organizations that currently hold IPv6 allocations may apply for a micro-allocation for internal infrastructure. Applicant must provide technical justification indicating why a separate non-routed block is required. Justification must include why a sub-allocation of currently held IP space cannot be utilized. Internal infrastructure allocations must be allocated from specific blocks reserved only for this purpose.

### **6.11. IPv6 Multiple Discrete Networks**

Organizations with multiple discrete IPv6 networks desiring to request new or additional address space under a single Organization ID must meet the following criteria:

1. The organization shall be a single entity and not a consortium of smaller independent entities.
2. The organization must have compelling criteria for creating discrete networks. Examples of a discrete network might include:
  - o Regulatory restrictions for data transmission,
  - o Geographic distance and diversity between networks,
  - o Autonomous multihomed discrete networks.
3. The organization must keep detailed records on how it has allocated space to each location, including the date of each allocation.
4. The organization should notify ARIN at the time of the request their desire to apply this policy to their account.
5. Requests for additional space:
  1. Organization must specify on the application which discrete network(s) the request applies to
  2. Each network will be judged against the existing utilization criteria specified in 6.5.2 and 6.5.3 as if it were a separate organization, rather than collectively as would be done for requests outside of this policy.

## **7. [Retired]**

## **8. Transfers**

### **8.1. Principles**

Number resources are nontransferable and are not assignable to any other organization unless ARIN has expressly and in writing approved a request for transfer. ARIN is tasked with making prudent decisions on whether to approve the transfer of number resources.

It should be understood that number resources are not 'sold' under ARIN administration. Rather, number resources are assigned to an organization for its exclusive use for the purpose stated in the request, provided the terms of the Registration Services Agreement continue to be met and the stated purpose for the number resources remains the same. Number resources are administered and assigned according to ARIN's published policies.

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.

## **8.2. Mergers, Acquisitions, and Reorganizations**

ARIN will consider requests for the transfer of number resources in the case of mergers, acquisitions, and reorganizations under the following conditions:

- 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.
- The minimum transfer size is the smaller of the original allocation size or the applicable minimum allocation size in current policy.
- The Internet number resources being transferred as part of an 8.2 transfer will not be subject to a needs-based assessment during the process of the 8.2 transfer.

AND one or more of the following:

- The recipient must provide evidence that they have acquired the assets that use the resources to be transferred from the current registrant.

OR

- The recipient must show that they have acquired the entire entity which is the current registrant.

## **8.3. Transfers Between Specified Recipients Within the ARIN Region**

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 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 8.2 transfers.
- Address resources from a reserved pool (including those designated in Section 4.4 and 4.10) are not eligible for transfer.

Conditions on recipient of the transfer:

- The recipients must meet the transfer requirements as defined in section 8.5.
- The resources transferred will be subject to current ARIN policies.



## 8.4. Inter-RIR Transfers to Specified Recipients

Inter-regional transfers of IPv4 number resources and ASNs 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 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, unless either the source or recipient entity owns or controls the other, or both are under common ownership or control. This restriction does not include 8.2 transfers.
- Address resources from a reserved pool (including those designated in Section 4.4 and 4.10) are not eligible for transfer.

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 must meet the transfer requirements as defined in section 8.5.
- Recipients within the ARIN region will be subject to current ARIN policies.

## 8.5. Specified Transfer Recipient Requirements

### 8.5.1. Registration Services Agreement

The receiving entity must sign an RSA covering all resources to be transferred unless that entity has a current (within the last two versions) RSA on file.

### 8.5.2. Operational Use

ARIN allocates or assigns number resources to organizations via transfer solely for the purpose of use on an operational network.

### 8.5.3. Minimum Transfer Size

ARIN's minimum IPv4 transfer size is a /24.

### 8.5.4. Initial Block

Organizations without direct assignments or allocations from ARIN qualify for transfer of an initial IPv4 block of ARIN's minimum transfer size.

### 8.5.5. Block Size

Organizations may qualify for the transfer of a larger initial block, or an additional block, by providing documentation to ARIN which details the use of at least 50% of the requested IPv4 block size within 24 months. An officer of the organization shall attest to the documentation provided to ARIN.

#### **8.5.6. Efficient Utilization of Previous Blocks**

Organizations with direct assignments or allocations from ARIN must have efficiently utilized at least 50% of their cumulative IPv4 address blocks in order to receive additional space. This includes all space reassigned to their customers.

#### **8.5.7. Alternative Additional IPv4 Address Block Criteria**

In lieu of 8.5.5 and 8.5.6, organizations may qualify for additional IPv4 address blocks by demonstrating 80% utilization of their currently allocated space. If they do so, they qualify to receive one or more transfers up to the total size of their current ARIN IPv4 address holdings, with a maximum size of /16.

An organization may qualify via 8.5.7 for a total of a /16 equivalent in any 6 month period.

### **9. Out of Region Use**

ARIN registered resources may be used outside the ARIN service region. Out of region use of ARIN registered resources are valid justification for additional number resources, provided that the applicant has a real and substantial connection with the ARIN region which applicant must prove (as described below) and is using the same type of resources (with a delegation lineage back to an ARIN allocation or assignment) within the ARIN service region as follows:

- IPv4: At least a /22 used in region
- IPv6: At least a /44 used in region
- ASN: At least one ASN present on one or more peering sessions and/or routers within the region.

A real and substantial connection shall be defined as carrying on business in the ARIN region in a meaningful manner. The determination as to whether an entity is carrying on business in the ARIN region in a meaningful manner shall be made by ARIN. Simply being incorporated in the ARIN region shall not be sufficient, on its own, to prove that an entity is carrying on business in the ARIN region in a meaningful manner. Methods that entities may consider using, including cumulatively, to prove that they are carrying on business in the ARIN region in a meaningful manner include:

- Demonstrating a physical presence in the ARIN region through a bricks and mortar location that is actually used for the purposes of conducting business in the ARIN region in a meaningful manner. That is to say, the location is not merely a registered office that serves no other business purpose.
- Demonstrating that the entity has staff in the ARIN region. The greater the number of staff, the stronger this connecting factor is.
- Demonstrating that the entity holds assets in the ARIN region. The greater the asset value, the stronger this connecting factor is.
- Demonstrating that the entity provides services to and solicits sales from residents of the ARIN region.
- Demonstrating that the entity holds periodic meetings in the ARIN region.
- Demonstrating that the entity raises investment capital from investors in the ARIN region.
- Demonstrating that the entity has a registered corporation in the ARIN region, although this factor on its own shall not be sufficient.
- Other fact based criterion that the entity considers appropriate and submits for ARIN's review.

The weight accorded to any of the above-noted factors, if any, shall be determined solely by ARIN.

The services and facilities used to justify the need for ARIN resources that will be used out of region cannot also be used to justify resource requests from another RIR. When a request for resources from ARIN is justified by need located within another RIR's service region, an officer of the application must attest that the same services and facilities have not been used as the basis for a resource request in the other region(s). ARIN reserves the right to obtain from the applicant a listing of all the applicant's number holdings in the region(s) of proposed use, when there are factual reasons to support the request.

## 10. Global Number Resource Policy

### 10.1. IANA to RIR Allocation of IPv4 Address Space

This document describes the policies governing the allocation of IPv4 address space from the IANA to the Regional Internet Registries (RIRs). This document does not stipulate performance requirements in the provision of services by IANA to an RIR in accordance with these policies. Such requirements should be specified by appropriate agreements among the RIRs and ICANN.

#### 1. Allocation Principles

- The IANA will allocate IPv4 address space to the RIRs in /8 units.
- The IANA will allocate sufficient IPv4 address space to the RIRs to support their registration needs for at least an 18 month period.
- The IANA will allow for the RIRs to apply their own respective chosen allocation and reservation strategies in order to ensure the efficiency and efficacy of their work.

#### 2. Initial Allocations

Each new RIR shall, at the moment of recognition, be allocated a new /8 by the IANA. This allocation will be made regardless of the newly formed RIR's projected utilization figures and shall be independent of the IPv4 address space that may have been transferred to the new RIR by the already existing RIRs as part of the formal transition process.

#### 3. Additional Allocations

A RIR is eligible to receive additional IPv4 address space from the IANA when either of the following conditions are met.

- The RIR's AVAILABLE SPACE of IPv4 addresses is less than 50% of a /8 block.
- The RIR's AVAILABLE SPACE of IPv4 addresses is less than its established NECESSARY SPACE for the following 9 months.

In either case, IANA shall make a single allocation of a whole number of /8 blocks, sufficient to satisfy the established NECESSARY SPACE of the RIR for an 18 month period.

##### 3.1 Calculation of AVAILABLE SPACE

The AVAILABLE SPACE of IPv4 addresses of a RIR shall be determined as follows:

AVAILABLE SPACE = CURRENTLY FREE ADDRESSES + RESERVATIONS EXPIRING DURING THE FOLLOWING 3 MONTHS - FRAGMENTED SPACE

FRAGMENTED SPACE is determined as the total amount of available blocks smaller than the RIR's minimum allocation size within the RIR's currently available stock.

### 3.2 Calculation of NECESSARY SPACE

If the applying Regional Internet Registry does not establish any special needs for the period concerned, NECESSARY SPACE shall be determined as follows:

NECESSARY SPACE = AVERAGE NUMBER OF ADDRESSES ALLOCATED MONTHLY DURING THE PAST 6 MONTHS \* LENGTH OF PERIOD IN MONTHS

If the applying RIR anticipates that due to certain special needs the rate of allocation for the period concerned will be greater than the previous 6 months, it may determine its NECESSARY SPACE as follows:

A) Calculate NECESSARY SPACE as its total needs for that period according to its projection and based on the special facts that justify these needs.

B) Submit a clear and detailed justification of the above mentioned projection (Item A).

If the justification is based on the allocation tendency prepared by the Regional Internet Registry, data explaining said tendency must be enclosed.

If the justification is based on the application of one or more of the Regional Internet Registry's new allocation policies, an impact analysis of the new policy/policies must be enclosed.

If the justification is based on external factors such as new infrastructure, new services within the region, technological advances or legal issues, the corresponding analysis must be enclosed together with references to information sources that will allow verification of the data.

If IANA does not have elements that clearly question the Regional Internet Registry's projection, the special needs projected for the following 18 months, indicated in Item A above, shall be considered valid.

### 4. Announcement of IANA Allocations

When address space is allocated to a RIR, the IANA will send a detailed announcement to the receiving RIR. The IANA will also make announcements to all other RIRs, informing them of the recent allocation. The RIRs will coordinate announcements to their respective membership lists and any other lists they deem necessary.

The IANA will make appropriate modifications to the "Internet Protocol V4 Address Space" page of the IANA website and may make announcements to its own appropriate announcement lists. The IANA announcements will be limited to which address ranges, the time of allocation and to which Registry they have been allocated.

## 10.2. Allocation of IPv6 Address Space by the Internet Assigned Numbers Authority (IANA) Policy to Regional Internet Registries

This document describes the policy governing the allocation of IPv6 address space from the IANA to the Regional Internet Registries (RIRs). This document does not stipulate performance requirements in the provision of services by IANA to an RIR in accordance with this policy. Such requirements will be specified by appropriate agreements between ICANN and the NRO.

### 1. Allocation Principles

- The unit of IPv6 allocation (and therefore the minimum IPv6 allocation) from IANA to an RIR is a /12
- The IANA will allocate sufficient IPv6 address space to the RIRs to support their registration needs for at least an 18 month period.
- The IANA will allow for the RIRs to apply their own respective chosen allocation and reservation strategies in order to ensure the efficiency and efficacy of their work.

### 2. Initial Allocations

- On inception of this policy, each current RIR with less than a /12 unallocated address space, shall receive an IPv6 allocation from IANA
- Any new RIR shall, on recognition by ICANN receive an IPv6 allocation from the IANA

### 3. Additional Allocations

A RIR is eligible to receive additional IPv6 address space from the IANA when either of the following conditions are met.

- The RIR's AVAILABLE SPACE of IPv6 addresses is less than 50% of a /12.
- The RIR's AVAILABLE SPACE of IPv6 addresses is less than its established NECESSARY SPACE for the following 9 months.

In either case, IANA shall make a single IPv6 allocation, sufficient to satisfy the established NECESSARY SPACE of the RIR for an 18 month period.

#### 3.1 Calculation of AVAILABLE SPACE

The AVAILABLE SPACE of IPv6 addresses of a RIR shall be determined as follows:

AVAILABLE SPACE = CURRENTLY FREE ADDRESSES + RESERVATIONS EXPIRING DURING THE FOLLOWING 3 MONTHS - FRAGMENTED SPACE

FRAGMENTED SPACE is determined as the total amount of available blocks smaller than the RIR's minimum allocation size within the RIR's currently available stock.

#### 3.2 Calculation of NECESSARY SPACE

If the applying Regional Internet Registry does not establish any special needs for the period concerned, NECESSARY SPACE shall be determined as follows:

NECESSARY SPACE = AVERAGE NUMBER OF ADDRESSES ALLOCATED MONTHLY DURING THE PAST 6 MONTHS \* LENGTH OF PERIOD IN MONTHS

If the applying RIR anticipates that due to certain special needs the rate of allocation for the period concerned will be different from the previous 6 months, it may determine its NECESSARY SPACE as follows:

Calculate NECESSARY SPACE as its total needs for that period according to its projection and based on the special facts that justify these needs.

Submit a clear and detailed justification of the above mentioned projection (Item A).

If the justification is based on the allocation tendency prepared by the Regional Internet Registry, data explaining said tendency must be enclosed.

If the justification is based on the application of one or more of the Regional Internet Registry's new allocation policies, an impact analysis of the new policy/policies must be enclosed.

If the justification is based on external factors such as new infrastructure, new services within the region, technological advances or legal issues, the corresponding analysis must be enclosed together with references to information sources that will allow verification of the data.

If IANA does not have elements that clearly question the Regional Internet Registry's projection, the special needs projected for the following 18 months, indicated in Item A above, shall be considered valid.

#### 4. Announcement of IANA Allocations

The IANA, the NRO, and the RIRs will make announcements and update their respective web sites regarding an allocation made by the IANA to an RIR. ICANN and the NRO will establish administrative procedures to manage this process.

### **10.3. IANA Policy for Allocation of ASN Blocks to RIRs**

#### Abstract

This document describes the policy governing the allocation of Autonomous System Numbers (ASNs) from the IANA to the Regional Internet Registries (RIRs).

This policy document does not stipulate performance requirements in the provision of services by the IANA to an RIR. Such requirements will be specified by appropriate agreements between ICANN and the Number Resource Organization (NRO).

#### 1. Allocation Principles

IANA allocates ASNs to RIRs in blocks of 1024 ASNs. In this document the term "ASN block" refers to a set of 1024 ASNs. Until 31 December 2010, allocations of 2-byte only and 4-byte only ASN blocks will be made separately and independent of each other.

This means until 31 December 2010, RIRs can receive two separate ASN blocks, one for 2-byte only ASNs and one for 4-byte only ASNs from the IANA under this policy. After this date, IANA and the RIRs will cease to make any distinction between 2-byte only and 4-byte only ASNs, and will operate ASN allocations from an undifferentiated 4-byte ASN allocation pool.

## 2. Initial Allocations

Each new RIR will be allocated a new ASN block.

## 3. Additional Allocations

An RIR is eligible to receive (an) additional ASN block(s) from the IANA if one of the following conditions is met:

1. The RIR has assigned/allocated 80% of the previously received ASN block, or
2. The number of free ASNs currently held by the RIR is less than two months need. This projection is based on the monthly average number of ASNs assigned/allocated by the RIR over the previous six months.

An RIR will be allocated as many ASN blocks as are needed to support their registration needs for the next 12 months, based on their average assignment/allocation rate over the previous six months, unless the RIR specifically requests fewer blocks than it qualifies for.

## 4. Announcement of IANA Allocations

The IANA, the NRO and the RIRs will make announcements and update their respective websites/databases when an allocation is made by the IANA to an RIR. ICANN and the NRO will establish administrative procedures to manage this process.

### **10.4. Global Policy for the Allocation of the Remaining IPv4 Address Space**

This policy describes the process for the allocation of the remaining IPv4 space from IANA to the RIRs. When a minimum amount of available space is reached, one /8 will be allocated from IANA to each RIR, replacing the current IPv4 allocation policy.

In order to fulfill the requirements of this policy, at the time it is adopted, one /8 will be reserved by IANA for each RIR. The reserved allocation units will no longer be part of the available space at the IANA pool. IANA will also reserve one /8 to any new RIR at the time it is recognized.

The process for the allocation of the remaining IPv4 space is divided in two consecutive phases:

#### **10.4.1. Existing Policy Phase**

During this phase IANA will continue allocating IPv4 addresses to the RIRs using the existing allocation policy. This phase will continue until a request for IPv4 address space from any RIR to IANA either cannot be fulfilled with the remaining IPv4 space available at the IANA pool or can be fulfilled but leaving the IANA remaining IPv4 pool empty.

This will be the last IPv4 address space request that IANA will accept from any RIR. At this point the next phase of the process (Exhaustion Phase) will be initiated.

## 10.4.2. Exhaustion Phase

During this phase IANA will automatically allocate the reserved IPv4 allocation units to each RIR (one /8 to each one) and respond to the last request with the remaining available allocation units at the IANA pool (M units).

### 10.4.2.1. Size of the Final IPv4 Allocations

In this phase IANA will automatically allocate one /8 to each RIR from the reserved space as defined in this policy. IANA will also allocate M allocation units to the RIR that submitted the last request for IPv4 addresses.

### 10.4.2.2. Allocation of the Remaining IPv4 Address Space

After the completion of the evaluation of the final request for IPv4 addresses, IANA MUST:

- a. Immediately notify the NRO about the activation of the second phase (Exhaustion Phase) of this policy.
- b. Proceed to allocate M allocation units to the RIR that submitted the last request for IPv4 address space.
- c. Proceed to allocate one /8 to each RIR from the reserved space.

## 10.5. Global Policy for Post Exhaustion IPv4 Allocation Mechanisms by the IANA

The IANA shall establish a Recovered IPv4 Pool to be utilized post RIR IPv4 exhaustion. The Recovered IPv4 Pool will initially contain any fragments that may be left over in the IANA. It will also hold any space returned to the IANA by any other means.

The Recovered IPv4 Pool will be administered by the IANA. It will contain:

- a. Any fragments left over in the IANA inventory after the last /8s of IPv4 space are delegated to the RIRs
  - The IANA inventory excludes "Special use IPv4 addresses" as defined in BCP 153 and any addresses allocated by the IANA for experimental use.
- b. Any IPv4 space returned to the IANA by any means.

The Recovered IPv4 Pool will stay inactive until the first RIR has less than a total of a /9 in its inventory of IPv4 address space. When one of the RIRs declares it has less than a total of a /9 in its inventory, the Recovered IPv4 pool will be declared active, and IP addresses from the Recovered IPv4 Pool will be allocated as follows:

- a. Allocations from the IANA may begin once the pool is declared active.
- b. In each "IPv4 allocation period", each RIR will receive a single "IPv4 allocation unit" from the IANA.
- c. An "IPv4 allocation period" is defined as a 6-month period following 1 March or 1 September in each year.
- d. The IANA will calculate the size of the "IPv4 allocation unit" at the following times:
  - When the Recovered IPv4 Pool is first activated
  - At the beginning of each IPv4 allocation period



To calculate the "IPv4 allocation unit" at these times, the IANA will use the following formula:

IPv4 allocation unit = 1/5 of Recovered IPv4 pool, rounded down to the next CIDR (power-of-2) boundary.

No RIR may get more than this calculation used to determine the IPv4 allocation unit even when they can justify a need for it.

The minimum "IPv4 allocation unit" size will be a /24. If the calculation used to determine the IPv4 allocation unit results in a block smaller than a /24, the IANA will not distribute any addresses in that IPv4 allocation period.

The IANA may make public announcements of IPv4 address transactions that occur under this policy. The IANA will make appropriate modifications to the "Internet Protocol V4 Address Space" page of the IANA website and may make announcements to its own appropriate announcement lists. The IANA announcements will be limited to which address ranges, the time of allocation, and to which Registry they have been allocated.

## **11. Experimental Internet Resource Allocations**

ARIN will allocate Numbering Resources to entities requiring temporary Numbering Resources for a fixed period of time under the terms of recognized experimental activity.

"Numbering Resources" refers to unicast IPv4 or IPv6 address space and Autonomous System numbers.

The following are the criteria for this policy:

### **11.1. Documentation of Recognized Experimental Activity**

A Recognized Experimental Activity is one where the experiment's objectives and practices are described in a publicly accessible document. It is a normal requirement that a Recognized Experimental Activity also includes the undertaking that the experiment's outcomes be published in a publicly accessible document at the end of the experiment. The conditions for determining the end of the experiment are to be included in the document. Applicants for an experimental allocation are expected to demonstrate an understanding that when the experiment ends, the allocation will be returned; a successful experiment may need a new allocation under normal policies in order to continue in production or commercial use, but will not retain the experimental allocation.

A "publicly accessible document" is a document that is publicly and openly available free of charges and free of any constraints of disclosure.

ARIN will not recognize an experimental activity under this policy if the entire research experiment cannot be publicly disclosed.

ARIN has a strong preference for the recognition of experimental activity documentation in the form of a document which has been approved for publication by the IESG or by a similar mechanism as implemented by the IETF.

### **11.2. Technical Coordination**

ARIN requires that a recognized experimental activity is able to demonstrate that the activity is technically coordinated.

Technical coordination specifically includes consideration of any potential negative impact of the proposed experiment on the operation of the Internet and its deployed services, and consideration of any related experimental activity.

ARIN will review planned experimental activities to ensure that they are technically coordinated. This review will be conducted with ARIN and/or third-party expertise and will include liaison with the IETF.

### **11.3. Coordination over Resource Use**

When the IETF's standards development process proposes a change in the use of Numbering Resources on an experimental basis the IETF should use a liaison mechanism with the Regional Internet Registries (RIRs) of this proposal. The RIRs will jointly or severally respond to the IETF using the same liaison mechanism.

### **11.4. Resource Allocation Term and Renewal**

The Numbering Resources are allocated for a period of one year. The allocation can be renewed on application to ARIN providing information as per Detail One. The identity and details of the applicant and the allocated Numbering Resources will be published under the conditions of ARIN's normal publication policy. At the end of the experiment, resources allocated under this policy will be returned to the available pool.

### **11.5. Single Resource Allocation per Experiment**

ARIN will make one-off allocations only, on an annual basis to any applicant. Additional allocations to an organization already holding experimental activity resources relating to the specified activity outside the annual cycle will not be made unless justified by a subsequent complete application.

It's important for the requesting organization to ensure they have sufficient resources requested as part of their initial application for the proposed experimental use.

### **11.6. Resource Allocation Fees**

ARIN may charge an administration fee to cover each allocation made of these experimental resources. This fee simply covers registration and maintenance, rather than the full allocation process for standard ARIN members. This administration fee should be as low as possible as these requests do not have to undergo the same evaluation process as those requested in the normal policy environment.

### **11.7. Resource Allocation Guidelines**

The Numbering Resources requested come from the global Internet Resource space, do not overlap currently assigned space, and are not from private or other non-routable Internet Resource space. The allocation size shall be consistent with the existing ARIN minimum allocation sizes, unless smaller allocations are intended to be explicitly part of the experiment. If an organization requires more resources than stipulated by the minimum allocation size in force at the time of its request, the request must clearly describe and justify why a larger allocation is required. All research allocations must be registered publicly in whois. Each research allocation will be designated as a research allocation with a comment indicating when the allocation will end.

### **11.8. Commercial Use Prohibited**

If there is any evidence that the temporary resource is being used for commercial purposes, or is being used for any activities not documented in the original experiment description provided to ARIN, ARIN reserves the right to immediately withdraw the resource and reassign it to the free pool.

### 11.9. Resource Request Appeal or Arbitration

ARIN reserves the ability to assess and comment on the objectives of the experiment with regard to the requested amount of Numbering Resources and its technical coordination. ARIN reserves the ability to modify the requested allocation as appropriate, and in agreement with the proposer. In the event that the proposed modifications are not acceptable, the requesting organization may request an appeal or arbitration using the normal ARIN procedures. In this case, the original proposer of the experimental activity may be requested to provide additional information regarding the experiment, its objectives and the manner of technical coordination, to assist in the resolution of the appeal.

### 12. Resource Review

1. ARIN may review the current usage of any resources maintained in the ARIN database. The organization shall cooperate with any request from ARIN for reasonable related documentation.
2. ARIN may conduct such reviews:
  - a) when any new resource is requested,
  - b) whenever ARIN has reason to believe that the resources were originally obtained fraudulently or in contravention of existing policy, or
  - c) whenever ARIN has reason to believe that an organization is not complying with reassignment or reallocation policies, or
  - d) at any other time without having to establish cause unless a full review has been completed in the preceding 24 months.
3. At the conclusion of a review in which ARIN has solicited information from the resource holder, ARIN shall communicate to the resource holder that the review has been concluded and what, if any, further actions are required.
4. Organizations found by ARIN to be materially out of compliance with current ARIN policy shall be requested or required to return resources as needed to bring them into (or reasonably close to) compliance.
  - a) The degree to which an organization may remain out of compliance shall be based on the reasonable judgment of the ARIN staff and shall balance all facts known, including the organization's utilization rate, available address pool, and other factors as appropriate so as to avoid forcing returns which will result in near-term additional requests or unnecessary route de-aggregation.
  - b) To the extent possible, entire blocks should be returned. Partial address blocks shall be returned in such a way that the portion retained will comprise a single aggregate block.
5. If the organization does not voluntarily return resources as requested, ARIN may revoke any resources issued by ARIN as required to bring the organization into overall compliance. ARIN shall follow the same guidelines for revocation that are required for voluntary return in the previous paragraph.
6. Except in cases of fraud, or violations of policy, an organization shall be given a minimum of six months to effect a return. ARIN shall negotiate a longer term with the organization if ARIN believes the organization is working in good faith to substantially restore compliance and has a valid need for additional time to renumber out of the affected blocks.
7. In case of a return under paragraphs 12.4 through 12.6, ARIN shall continue to provide services for the resource(s) while their return or revocation is pending, except any maintenance fees assessed during that period shall be calculated as if the return or revocation was complete.
8. This policy does not create any additional authority for ARIN to revoke legacy address space. However, the utilization of legacy resources shall be considered during a review to assess overall compliance.
9. In considering compliance with policies which allow a timeframe (such as a requirement to assign some number of prefixes within 5 years), failure to comply cannot be measured until after the timeframe specified in the applicable

policy has elapsed. Blocks subject to such a policy shall be assumed in compliance with that policy until such time as the specified time since issuance has elapsed.

## **Appendix A - Change Log**

The Change Log can be found at:

[https://www.arin.net/policy/nrpm\\_changelog.html](https://www.arin.net/policy/nrpm_changelog.html)