



**ARIN 44**

31 October - 1 November 2019 • Austin, Texas

# **Adopted IPv4 Waitlist Policy Recommendation**

***John Curran, ARIN President and CEO***

# Timeline



- Board Suspends Waitlist Issuance - 7 February 2019
- AC Recommendation to Waitlist Policy (first draft) - 29 April 2019
  - Draft issued – ARIN-2019-16: Advisory Council Recommendation Regarding NRPM 4.1.8. Unmet Requests
- Staff and Legal Review: 1 May 2019
- Revised and published to PPML - 24 May 2019
- Reviewed and adopted by ARIN Board – 20 June 2019
- Implemented – 10 July 2019

# Board Suspends Waitlist Issuance



*“The ARIN Board of Trustees, in light of the potential misuse of number resources under NRPM section 4.1.8 (Unmet Requests), suspends issuance of number resources per NRPM section 4.1.8.2. (Fulfilling unmet needs), and refers NRPM section 4.1.8 to the ARIN Advisory Council for their recommendation.”*

[https://www.arin.net/about/welcome/board/meetings/2019\\_0116/](https://www.arin.net/about/welcome/board/meetings/2019_0116/)

# AC Recommendation (1/4)



This is an updated version which incorporates feedback from the ARIN staff and was approved for further community consultation at the ARIN AC meeting on May 16, 2019.

In accordance with section 10.2 of the ARIN Policy Development Process, the ARIN Advisory Council recommends the following actions to the Board of Trustees in response to the Board's suspension of part of the operation of sections 4.1.8, 4.1.8.1 and 4.1.8.2 of the Numbering Resource Policy Manual:

# AC Recommendation (2/4)



Replace section 4.1.8 et. seq. as follows, then reinstate the full operation of sections 4.1.8, 4.1.8.1 and 4.1.8.2 immediately.

## 4.1.8 ARIN Waitlist

ARIN will only issue future IPv4 assignments/allocations (excluding 4.4 and 4.10 space) from the ARIN Waitlist. The maximum size aggregate that an organization may qualify for at any one time is a /22.

Organizations will be able to elect a smaller block size than they qualify for down to a /24. Only organizations holding a /20 or less of IPv4 address space may apply and be approved. Address space distributed from the waitlist will not be eligible for transfer for a period of 60 months. This policy will be applied to all future distributions from the waitlist to include those currently listed.

# AC Recommendation (3/4)



Repeated requests, in a manner that would circumvent 4.1.6, are not allowed: an organization currently on the waitlist must wait 90 days after receiving a distribution from the waitlist before applying for additional space.

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 will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

# AC Recommendation (4/4)



## 4.1.8.1 Sequencing

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 Fulfillment

ARIN will fulfill requests on a first-approved basis, subject to the size of each available address block as address blocks become available for distribution. A timely review of the original request may be conducted by ARIN staff. Requests will not be partially filled. Any requests met through a transfer will be considered fulfilled and removed from the waiting list.

# Staff and Legal Review



## Staff Comments:

The AC recommendation places a restriction of /22 on the maximum size IPv4 address block that can be obtained through distribution from the ARIN waitlist.

RSD interprets this to mean that the maximum block size an organization can receive from the ARIN waitlist is a /22 even if they qualify for a larger block.

Organizations qualifying for a /22 or larger will still have the option to select a minimum size block of /23 or /24. Organizations qualifying for a /23 will be allowed to select a /23 as their maximum and a /24 as their minimum and if an organization qualifies for a /24 maximum a /24 will also be their minimum.



# Staff and Legal Review



## Staff Comments (continued):

In addition if an organization holds greater than a /20 in IPv4 address space they are not eligible to receive additional space from ARIN's waitlist. Further any address space received from the ARIN waitlist will not be transferrable for a period of 60 months. If implemented as written ARIN staff would interpret these policies to apply to all waitlist distributions going forward including requests already on the waitlist.

ARIN staff would immediately perform an audit of the current waitlist and remove and inform any organization that holds more than a /20 in IPv4 space excluding 4.4 and 4.10. ARIN staff would reach out to each organization currently on the waitlist to verify their justifications for a maximum of /22, /23 and /24 and to confirm their minimum acceptable block size. ARIN staff would inform all current and future requests of the new policy guidelines prior to approval.

# Staff and Legal Review



## Legal Comments:

The proposal requires legal analysis. Counsel strongly supports the revised policy's central feature of a limit on the size of the block that can be issued from the waiting list.

The new AC proposal will help reduce fraudulent applications, such as those that were being made under the pre-suspension policy, which allowed for allocation of larger number resource blocks. However, the proposal as drafted has language that is potentially confusing (as does policy proposal 2019-2).

The excess language could create the mistaken impression that larger blocks must still be issued. Policy language that simply states that no applicant can obtain a direct distribution from ARIN larger than a set prefix size chosen by the AC [/22] is strongly preferred.

# Staff and Legal Review



## Legal Comments (continued):

It is also clear the AC draft intends to have a the effect of reducing the size of the block to those who were on the list before suspension occurred. The clearest possible language should be used to provide notice that ARIN may interpret the proposed policy will limit the previously approved requests for size. It would be best to have the AC clearly articulate its intention in this regard.

***The AC recommendation was revised to incorporate the feedback from the Staff and Legal Review, and the revised version published to arin-ppml on 24 May 2019 for a period of 14 days***

# ARIN Board Adoption – 20 June 2019



*“The ARIN Board of Trustees accepts the ARIN Advisory Council’s recommendation to replace the Number Resource Policy Manual Section 4.1.8, as amended; and, reinstate the full operation of the Number Resource Policy Manual Sections 4.1.8, 4.1.8.1, and 4.1.8.2 immediately.”*

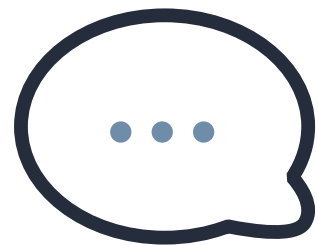
[https://www.arin.net/about/welcome/board/meetings/2019\\_0620/](https://www.arin.net/about/welcome/board/meetings/2019_0620/)

***The AC Recommendation was implemented 10 July 2019***

# Questions for the Community



- Do you agree with the revised policy as implemented?
- Are there other changes you feel are now needed as a result of this policy change?



# Discussion

