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VIRTUAL MEETING

**Recommended Draft Policy
ARIN-2019-1: Clarify Section 4
IPv4 Request Requirements**

History



- Advisory Council Shepherds:
 - Kat Hunter, Amy Potter
- Proposal - ARIN-prop-260 – 30 January 2019
- Draft Policy – 26 February 2019
- Recommended – 23 July 2019
- Reverted to Draft – 25 February 2020
- Recommended – 27 May 2020
- Presented at:
 - ARIN 43, ARIN 44
- Latest Version:
 - 18 May 2020

Staff and Legal Review



- Summary (Staff Understanding)
 - ARIN-2019-1 would restrict organizations that are involved in 8.2, 8.3, and 8.4 transfers from applying for IP addresses from the ARIN Waitlist for specific time periods.
 - Specifically it adds a 36-month restriction for source organizations, and 90-day restrictions for 8.3 and 8.4 recipient organizations.
 - Additionally, it specifies that 8.3/8.4 recipient organizations and 8.2/8.3/8.3 source organizations will have any current ARIN Waitlist requests removed.

Staff and Legal Review



- Staff Comments
 - The text is clear and understandable, and can be implemented as written.
 - All previous staff suggestions have been accounted for.

Staff and Legal Review



- Legal Assessment
 - The policy as written creates no material legal issues.
- Resource Impact
 - Minimal - could be implemented within three months.
 - The following would be needed in order to implement:
 - Staff training
 - Updated guidelines and internal procedures
 - Standard documentation updates

AC Shepherd Presentation...

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VIRTUAL MEETING

**Recommended Draft Policy 2019-1: Clarify Section
4 IPv4 Request Requirements**

Shepherds: Kat Hunter and Amy Potter

ARIN-2019-1 Policy Goals



- Clarify 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 36 months from applying for additional IPv4 space under NRPM Section 4.

ARIN-2019-1 Current Policy



- Current Language

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

ARIN-2019-1 Proposed Policy



- Proposed New Language – Section 4

Multiple requests are not allowed: an organization currently on the waitlist must wait 90 days after receiving a distribution from the waitlist or IPv4 number resources as a recipient of any transfer 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 will also be advised of the availability of the transfer mechanism in section 8.3 as an alternative mechanism to obtain IPv4 addresses.

Restrictions apply for entities who have conducted recent resource transfers. These restrictions are specified in Section 8 for each relevant transfer category.

ARIN-2019-1 Proposed Policy



- Proposed New Language – Section 8.2 & 8.3
- Add the following under 8.2. Mergers, Acquisitions, and Reorganizations:
 - An organization which serves as the source of an 8.2 IPv4 transfer will not be allowed to apply for IPv4 address space under section 4.1.8 ARIN Waitlist for a period of 36 months following said transfer unless the recipient organization remains a subsidiary, parent company, or under common ownership with the source organization.
- Add the following under 8.3. Transfers Between Specified Recipients Within the ARIN Region and under the Conditions on the source of the transfer:
 - The source entity will not be allowed to apply for IPv4 address space under Section 4.1.8. ARIN Waitlist for a period of 36 months following the transfer of IPv4 address resources to another party.
- Under conditions on the recipient:
 - If applicable the recipient will be removed from the ARIN Waitlist and will not be allowed to reapply under section 4.1.8. ARIN Waitlist for a period of 90 days.

ARIN-2019-1 Proposed Policy



- Proposed New Language – Section 8.4 & 8.6
- Add the following under 8.4. Transfers Between Specified Recipients Within the ARIN Region and under the Conditions on the source of the transfer:

The source entity will not be allowed to apply for IPv4 address space under Section 4.1.8. ARIN Waitlist for a period of 36 months following the transfer of IPv4 address resources to another party.

- Under conditions on the recipient:

If applicable the recipient will be removed from the ARIN Waitlist and will not be allowed to reapply under section 4.1.8. ARIN Waitlist for a period of 90 days.

- Add: 8.6 Wait List Restrictions section

Any organization which is on the wait list and submits a request to be the source of a transfer under any provision in section 8 will be removed from the wait list.

ARIN-2019-1 Points of Interest

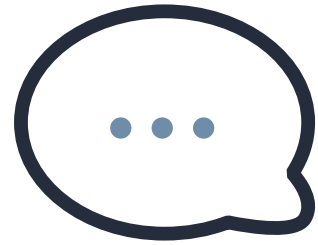


- This proposal incorporates two related policy goals
- There have been updates to section 4 since the beginning of the work on this policy. Text has been updated to reflect current NRPM.
- There was significant community support to change the word “repeated” as it was vague. Additionally, there was concerned that a company may perform an M&A transfer to itself/parent company and the original proposed language would exclude those companies from being able to apply to the waitlist.
- Before the last staff and legal review the draft policy did not include the removal of pending ARIN Waitlist requests for organizations that act as source organizations for 8.2, 8.3, or 8.4 transfers. This has been remedied with section 8.6
- Reception on PPML

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Thank you.

Any Questions?



Discussion

