Discussion Guide

ARIN
PUBLIC POLICY
CONSULTATION

@NANOG 61

WELCOME

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

The ARIN Board of Trustees adopts policies recommended to it 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 the policies are in compliance with law and ARIN's mission.

An ARIN PPC 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.

Meeting Courtesies and Expected Standards of Behavior

All participants are requested to:

1. Mute the audio output of their computers and other electronic devices.
2. Listen to the speakers and not engage in activities that are unrelated to the draft policy being discussed, such as processing email.

Those who take part in ARIN's PDP undertake to:

- Treat each other and all members of the ARIN community respectfully both in person and online, irrespective of the nationality, gender, racial or ethnic origin, religion or beliefs, disability, age, sexual orientation, occupation, line of business, or policy position they espouse.

- Work to build consensus with others in order to develop solutions to issues. The ARIN policy development process is a bottom-up, consensus driven approach. Those who take part in the process must take responsibility for its success by working to build consensus with other participants.

- Act fairly and in good faith with other participants in the ARIN process.

Rules of Discussion

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 their affiliation (organization, company, etc.).

    c. 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 (3) 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 the participants and will explain what affirmative and negative responses mean.

DISCUSSION GUIDE

For Discussion

This document contains the draft policies and proposals on the Public Policy Consultation agenda. The text in this document is up to date through 3 June 2014.

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Discussion Structure

Policy development is facilitated by the use of a structured process at the Public Policy Consultation. The steps in this process are:

1. Introduction: The history of the draft policy/proposal, including the date of introduction, the date of designation as a draft policy, and any previous considerations is presented. The presentation also identifies the ARIN Advisory Council members who are the shepherds. If applicable , ARIN staff and legal assessments are reviewed.

2. Presentation: A member of the ARIN Advisory Council normally presents the draft policy/proposal.

3. Discussion: Discussion is conducted using the Rules of Discussion.

https://www.arin.net/policy/proposals/2013_8.html

Advisory Council Shepherds: **Cathy Aronson, Owen DeLong, Robert Seastrom**

16 May 2014

AC's assessment of conformance with the Principles of Internet Number Resource Policy:

This proposal enables fair and impartial number resource administration by documenting how to get a new block for a new discrete network. Previous versions of the policy did have this information and over time it has been removed.

This proposal is technically sound. There is a need for discrete networks and an organization should have a policy that would allow it to create a new discrete network.

This proposal is supported by the community. There has been some concern about the criterial that will be used and this version has been updated with the current thinking on the criteria.

Policy Statement:

IPv4:
Add the following statement to section 4.5.4.
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 unless the organization can demonstrate additional need using the immediate need criteria (4.2.1.6).

IPv6:
Add an additional reference to section 6.11.5.b such that it references both the initial allocation and subsequent allocation sections of the IPv6 LIR policy.
"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..."

Comments:
a. Timetable for implementation: immediate

b. This policy is being proposed based upon the Policy Implementation & Experience Report from ARIN 32. https://www.arin.net/participate/meetings/reports/ARIN_32/PDF/thursday/nobile-policy.pdf

c. Older versions of the MDN policy did contain new network criteria. This criteria appears to have been dropped during subsequent rewrites of the MDN policy. "The organization must not allocate a CIDR block larger than the current minimum assignment size of the RIR (currently /20 for ARIN) to a new network." (https://www.arin.net/policy/archive/nrpm_20041015.pdf)

STAFF ASSESSMENT of earlier version of text

ARIN Staff and Legal Assessment

ARIN-prop-2013-8 – "Subsequent Allocations for Additional Discrete Network Sites"

Date of Assessment: 04 Mar 2014

1. Summary (Staff Understanding)

This proposal adds missing criteria to existing policy NRPM 4.5 Multiple Discrete Networks and NRPM 6.11 IPv6 Multiple Discrete Networks to assist staff and the community in determining allocation sizes for the new sites of existing MDN customers.

2. Comments

A. ARIN Staff Comments

The revised text removed the requirement to have obtained connectivity at the new site and replaced it with a requirement that "the organization has demonstrated need at its new discrete network site".

· If implemented, ARIN would continue to interpret "has demonstrated need" to mean "has obtained connectivity" at a new site. As stated, it seems to leave this open ended and up to staff to determine what "demonstrated need" is.
· If the author desires the policy to be implemented in some other way, the text should be revised with specific details as to exactly what an organization must show to qualify for space for a new discrete network.
· If an organization has only to tell staff that they need address space for a new site without any means of verification, this policy could enable them to obtain IPv4 address space without any actual need.

B. ARIN General Counsel - Legal Assessment

The policy does not create legal concerns.

3. Resource Impact

This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

· Updated guidelines and internal procedures

· Staff training

Draft Policy ARIN-2014-1
Out of Region Use

https://www.arin.net/policy/proposals/2014_1.html

Advisory Council Shepherds: **Milton Mueller, Bill Darte**

28 March 2014

Problem statement:
Current policy neither clearly forbids nor clearly permits out or region use of ARIN registered resources. This has created confusion and controversy within the ARIN community for some time. Earlier work on this issue has explored several options to restrict or otherwise limit out of region use. None of these options have gained consensus within the community. The next logical option is to discuss a proposal that clearly permits out of region use without limits, beyond those already existing in policy.

Permitting out of region use, however, poses issues that have to be addressed by policy and adjustments to operational practice. Out of region use needs a clear definition and any operational practices based on that definition must not be unnecessarily burdensome. It is significantly more difficult and costly for ARIN Staff to independently verify the justification and utilization of resources that are reassigned or otherwise used outside of the ARIN service region. There needs to be recognition of this difference in policy and associated operational practices, especially the cost differential when there is more than an incidental amount of out of region use.

 Policy statement:

 Create new Section X;

 X. Out of Region Use

ARIN registered resources may be used outside the ARIN service region and such use is valid justification for new or additional resources. Resources are considered to be used outside the region if the user or customer service address or the technical infrastructure address, such as the point of presence (POP), data center, or other similar location, are outside the ARIN service region.

 There is a general presumption that requesting resources from ARIN for use within another RIR's service region duplicates any resources held by the organization with that other RIR. Therefore, the organization should, not hold any resources with the other RIR, or demonstrate that all such resources held are utilized based on ARIN policy requirements, or provide an operational justification clarifying how the resources from ARIN will not duplicate any underutilized resources held with the other RIR.

Only the utilization rate of ARIN registered resources or immediate need may be use to determine a valid request size beyond the applicable minimum allocation size. The utilization rate of resources received from another RIR is not applicable in determining a valid request size.

X.1 Verification of Out of Region Use

 The utilization of all ARIN registered resources must be verified when evaluating a request for additional resources or during a resource review, including any resources used outside the ARIN service region. All ARIN registered resources used outside the region must be verified to no less than an equivalent standard as resources used within the ARIN region. To this end ARIN, in its sole discretion, may engage independent external entities to assist it in the verification of information related to any resources used outside the region.

 X.2 Reporting Resources Held with other RIRs

 Except to the extent that incidental use, multi-instance use, or the critical infrastructure criteria described below apply, when out of region need is used to justify a request for resources from ARIN; The requesting organization will also report to ARIN the utilization status, based on applicable ARIN policy, of all resources it holds with the RIRs who's service regions the need justifying a request to ARIN is within, and any additional supporting documentation requested by ARIN regarding these reported resource.

 X.3 Incidental Use

 Out of region use of ARIN registered resources by an organization that totals less than an equivalent of a /20 of IPv4, a /36 of IPv6, and two (2) ASNs within each of the other RIR's service regions are considered incidental use and as such are accounted for as if used within the ARIN service region.

 X.4 Multi-Instance Use

 Any resources used simultaneously in multiple locations, such as an anycast prefix or ASN, are considered as used within the ARIN service region, provided at least one instance is located within the region, regardless of how many other instances are located outside the region.

 X.5 Critical Infrastructure

 Resources justified through ARIN critical infrastructure policies are accounted for as if used within the ARIN service region, regardless of their actual location of use.

Comments:
a. Timetable for implementation: Immediate

b. Anything else:

 Current policy is ambiguous on the issue of out of region use of ARIN registered resources. The only guidance on the issue in current policy is in Section 2.2, that defines the term RIR; "... The primary role of RIRs is to manage and distribute public Internet address space within their respective regions." Some in the community believe this means out of region use should be at least limited or restricted while others believe this is only intended to focus efforts within the region and not define where resources may be used.

Several other policy proposals have explored restricting or otherwise limiting out of region use. None of these proposals gained consensus within the ARIN community. During the latest of these proposals, ARIN-2013-6, several standards were explored, a majority of use within region, a plurality of use within region, and some discussion of a minimum of 20 percent use within region. It was felt that each of these standards would interfered, to one extent or another, with the legitimate operations of multi- or trans-regional networks.

Section 2.2 tells us, the primary purpose of the RIRs are to manage and distribute resources within their regions. None the less, there have always been networks that don't neatly fit within the regions created by the RIR system. These legitimate trans-regional networks are operated by international businesses or global service providers, many of which are based within the ARIN region. Prior to IPv4 run-out, many of these trans-regional networks requested resources from ARIN for use both inside or outside the region, as long as the requests were justified by need.

As a result of IPv4 run-out, many in the community want to restrict out of region use to prevent ARIN resources from going to networks without a real technical presence in the ARIN region. However, any attempt to limit or restrict such out of region use inevitably will affect these legitimate trans-regional networks. Further, even the most restrictive regional use requirements will not significantly prolong the availability of IPv4 resources within the ARIN region. Therefore, attempting to restrict or limit out of region use of resources, even if it were for IPv4 only, is ineffective, inefficient, and overly burdensome to important elements of the global Internet.

The major concept behind this proposal is to allow out of region use without any limits, other than those already in policy, but bring an economic and reporting factors to play on the issue. It requires ARIN to verify out of region use of ARIN registered resources to no less than an equivalent standard as in region use, and enables ARIN to engage external entities to assist in this verification. It is expected ARIN will have agreements with all such external entities to ensure the confidentiality of all supporting documentation is preserved.

ARIN engaging external entities to assist in verification of out of region use is mostly an ARIN business issue, and not primarily a policy issue. However, today there is a general assumption that such verification for in region use is done almost exclusively in house at ARIN. Making this issue clear in policy follows a principle of least surprise, as the use of such external entities is likely to be frequently necessary to verify out of region use, especially in parts of the world where English is not the primary language. Or put another way, use of an external entity when verifying out of region use is more likely to be the rule rather than an exception.

When resources are requested for out of region use an organization also needs to report the utilization status of all resources it holds with the RIRs for the regions that the requested need is within. This is to ensure there are not underutilized resources held with another RIR that would contradict the justified need for resources from ARIN.

There are additional expenses and complexity involved in verifying out of region use, as a result of language and logistical barriers that the regionality of the RIR system was originally conceived to mitigate.

In addition, evaluating the reported information about resources held with other RIRs, needed to ensure ARIN resources are not duplicating resources held with outer RIRs, increase staff's burden

related to out of region use. Furthermore, section 2.2 is clear that providing resources for out of region use is, at best, only a secondary role for ARIN. As a result, out of region use should not significantly burden the primary role of providing resources for use within the region. These factors justify a recommendation to the Board of Trustees to create a separate fee structure for out of region use, creating the aforementioned economic factor.

This economic factor and the recommendation for a separate fee structure, are again mostly ARIN business issues, and not part of policy in general. However, this is one of those instances where policies and fees are intertwined.

It seems reasonable that this economic factor should be applied only to those that make substantial use of ARIN registered resources outside the region, and not to those that primarily use resources within the region. This proposal defines incidental out of region use, to ensure that trivial, insignificant or otherwise incidental use are exempt from the discussed economic factor, the reporting of resources help with other RIRs as well, and are accounted for as if used within the region.

Some amount of out of region use should be considered normal even for a network primarily based within the ARIN region. For example, numbering a global backbone that provides global access necessary for in region customers. Also, the other RIRs have minimum requirements to justify an initial allocation or assignment, similar to ARIN. These and other examples and issues, justify allowing some minimal amount of out of region use to be accounted for as if it were in region use. The currently proposed policy statement, X.3, defines incidental use in terms of an absolute thresholds for each type of resource.

Another option would be a percentage based threshold, say 20%. However, a percentage based threshold has the disadvantage that even a minimal change in usage can cause the ratio between in region and out of region use to change, potentially causing an oscillation around this threshold. This creates significant uncertainty for organizations as to if the discussed economic factor will apply to them, or not. Where as once an absolute threshold has been crossed by a significant amount, it is highly unlikely that any additional changes in usage will cause an oscillation around the threshold, providing much more certainty for most organizations.

Additionally, the proposal deals with a couple special cases in X.4 and X.5. Due to the relatively small resource impact and high importance to overall Internet stability; resources for critical infrastructure are accounted for as if used within the region. Anycast prefixes, and other resources used simultaneously in multiple locations, are considered as used outside the region only when they are exclusively used outside the region. Or put another way, as long as at least one instance is located within the region, they are considered used within the region, regardless of how many other instances are located outside the region. Both of these special cases have an overall positive impact on the Internet and should not be discouraged in anyway by this policy, lumping them in with general out of region use could be a disservice to the Internet and unnecessarily burdensome.

The intent of allowing an operational justification to clarify how resources received from ARIN will not duplicate any underutilized resources held with another RIR is to account for situations like; It may be necessary to use resources from another RIR to meet legal or regulatory requirements, or prevailing operational expectations,

in some economies around the world. In such cases it is justified to also receive minimal resources from another RIR for use only in those economies. And using resources received from ARIN for the rest of a global network.

In summary, this proposal ensures that global organizations or global service providers base within the ARIN region may receive resources to operate their global network solely from ARIN, if they wish to do so. As long as the utilization of the out of region resources are verified to no less than an equivalent standard as in region resources and any additional reporting requirements are also meet. This is particularly important for IPv6; requiring organizations get IPv6 resources from multiple RIRs, or even making it appear that they should, will result in additional unique non-aggregatable prefixes within the IPv6 route table, rather than minimizing them, which one of the policy objectives for IPv6.

Finally, a separate but somewhat related issue; regardless of where ARIN registered resources are used, inside or outside of the ARIN service region, organizations must first qualify to receive resources from ARIN. ARIN's current operational practice is that an organization must be formed within the ARIN service region in order to qualify to receive any resources from ARIN. The issue of who should be eligible to receive resources was commingled with out of region use in ARIN-2013-6. It was felt these issues should be considered separately. Therefore, the issue of who should be eligible to receive resources is purposefully not dealt with by this proposal, and if any changes are necessary there should be separate policy proposals to deal with this issue independently.

Summary of Changes;

- Clarified out of region use is valid justification for both new or additional resources.

- Eliminated "user or customer billing address" from definition for out of region use, and change the items left to sentence from, instead of list form.

- Added that there is a general presumption that requesting resources from ARIN for use within another RIR's service region duplicates any resources held by the organization with that other RIR.

- Made it clear that only the utilization rate of ARIN resources or immediate need are used to determine the valid request size.

- New sections X.2 "Reporting Resources Held with other RIRs," this new section is intended to have organizations report the utilization of their resources, based on ARIN Policy, for the other RIRs where they are requesting ARIN resources for. Except to the extent incidental use, multi-instance use, or critical infrastructure clauses apply.

- Changed incidental use to be on a per other RIR region basis to simplify the determination of if the Reporting Resources Held with other RIRs applies.

- Changed multi-instance use to use "at least one instance is located within the region" language.

- Updated the comments section to account for the above changes.

Here is an annotated version of the policy text

Deleted Text

New Text

Retained Text

X. Out of Region Use

ARIN registered resources may be used outside the ARIN service region and such use is valid justification for new or additional resources. Resources are considered to be used outside the region if any of the following are located outside the region. A. The user or customer billing address B. the user or customer service address or C. the technical infrastructure address, such as the point of presence (POP), data center, or other similar location, are outside the ARIN service region.

There is a general presumption that requesting resources from ARIN for use within another RIR's service region duplicates any resources held by the organization with that other RIR. Therefore, the organization should, not hold any resources with the other RIR, or demonstrate that all such resources held are utilized based on ARIN policy requirements, or provide an operational justification clarifying how the resources from ARIN will not duplicate any underutilized resources held with the other RIR.

Only the utilization rate of ARIN registered resources or immediate need may be use to determine a valid request size beyond the applicable minimum allocation size. The utilization rate of resources received from another RIR is not applicable in determining a valid request size.

X.1 Verification of Out of Region Use

The utilization of all ARIN registered resources must be verified when evaluating a request for additional resources or during a resource review, including any resources used outside the ARIN service region. All ARIN registered resources used outside the region must be verified to no less than an equivalent standard as resources used within the ARIN region. To this end ARIN, in its sole discretion, may engage independent external entities to assist it in the verification of information related to any resources used outside the region.

X.2 Reporting Resources Held with other RIRs

Except to the extent that incidental use, multi-instance use, or the critical infrastructure criteria described below apply, when out of region need is used to justify a request for resources from ARIN; The requesting organization will also report to ARIN the utilization status, based on applicable ARIN policy, of all resources it holds with the RIRs who's service regions the need justifying a request to ARIN is within, and any additional supporting documentation requested by ARIN regarding these reported resource.

X.23 Incidental Use

Out of region use of ARIN registered resources by an organization that totals less than an equivalent of a /20 of IPv4, a /36 of IPv6, and two (2) 10 ASNs within each of the other RIR's service regions are considered incidental use and as such are accounted for as if used within the ARIN service region.

X.4 Multi-Instance Use

Any resources used simultaneously in multiple locations, such as an

anycast prefix or ASN, are accounted for as used outside the region, only if they are exclusively used outside the region.considered as used within the ARIN service region, provided at least one instance is located within the region, regardless of how many other instances are located outside the region.

 X.35 Critical Infrastructure

Resources justified through ARIN critical infrastructure policies are accounted for as if used within the ARIN service region, regardless of their actual location of use.

Draft Policy ARIN-2014-3
Remove 8.2 and 8.3 and 8.4 Minimum IPv4 Block Size Requirements

https://www.arin.net/policy/proposals/2014_3.html

Advisory Council Shepherds: **Owen DeLong, Bill Darte**

29 January 2014

Problem Statement:
All three transfer sections make the minimum block size allowed to be transferred a /24. In a post-exhaustion world, policy should allow and enable networks to move blocks around as they see fit, without arbitrary regulation of a minimum size.

Policy statement:
Remove all instances in 8.2, 8.3, and 8.4 which set a minimum transfer size of a /24.

Comments:
• Timetable for implementation: Immediate

• Anything else:

https://www.arin.net/policy/proposals/2014_5.html

Advisory Council Shepherds: **Robert Seastrom**

21 April 2014

AC's assessment of conformance with the Principles of Internet Number Resource Policy:

"ARIN-2014-5: Remove 7.2 Lame Delegations enables fair and impartial number resource administration by removing a no-longer-relevant section of the NRPM. All of the changes in this draft policy have proven uncontroversial thus far, with substantially more hands for the policy than against."

Problem Statement:

Section 7.2, asking ARIN to resolve Lame Delegations in in-addr. arpa, was established almost 10 years ago. While there may be real lameness problems in the in-addr.arpa tree, this should no longer be part of ARIN policy for two reasons:

1) NRPM should primarily be used to determine when requestors do, and do not, qualify for number resources because that's what ARIN's purpose is relevant to. ARIN is not an operational technical body, and its policy should only regulate activities ARIN is designed to participate in.

1a) We don't put text about how to operate Whois or RWhois or IRR in NRPM, so we should not put in text about how to operate DNS.

2) ARIN has never effectively implemented this. If there's still a need, it should be addressed directly with ARIN management and staff for prioritization.

Policy statement:

Remove section 7.2

Comments:
a. Timetable for implementation: Immediate
b. Anything else:

7.2. Lame Delegations in IN-ADDR.ARPA

ARIN will actively identify lame DNS name server(s) for reverse address delegations associated with address blocks allocated, assigned or administered by ARIN. Upon identification of a lame delegation, ARIN shall attempt to contact the POC for that resource and resolve the issue. If, following due diligence, ARIN is unable to resolve the lame delegation, ARIN will update the Whois database records resulting in the removal of lame servers.

##########

ARIN Staff and Legal Assessment

ARIN-prop-2014-5 – "Remove 7.2 Lame Delegations"

Date of Assessment: 04 Mar 2014

1. Summary (Staff Understanding)

This proposal would remove NRPM section 7.2 because it is out of scope for ARIN and because ARIN has never effectively implemented this policy.

2. Comments

A. ARIN Staff Comments

· This proposal would not change current operational practice. When ARIN switched over to per-zone DNS management, we ran into some significant issues with lame detection and remediation and as a result, lame delegation testing was suspended.

· Issues included the lack of a clear definition of what a lame DNS server was, and the potential risk of removing misconfigured, but working reverse DNS servers.

· This proposal could be implemented as written.

B. ARIN General Counsel - Legal Assessment

The policy does not create legal concerns.

3. Resource Impact

This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

· Updated guidelines

4. Proposal Text

Problem Statement:

Section 7.2, asking ARIN to resolve Lame Delegations in in-addr. arpa, was established almost 10 years ago. While there may be real

lameness problems in the in-addr.arpa tree, this should no longer be part of ARIN policy for two reasons:

1) NRPM should primarily be used to determine when requestors do, and do not, qualify for number resources because that's what ARIN's purpose is relevant to. ARIN is not an operational technical body, and its policy should only regulate activities ARIN is designed to participate in.

1a) We don't put text about how to operate Whois or RWhois or IRR in NRPM, so we should not put in text about how to operate DNS.

2) ARIN has never effectively implemented this. If there's still a need, it should be addressed directly with ARIN management and staff for prioritization.

Policy statement:

Remove section 7.2

Comments:
• Timetable for implementation: Immediate

• Anything else:

Draft Policy ARIN-2014-6
Remove 7.1 [Maintaining IN-ADDRs]

https://www.arin.net/policy/proposals/2014_6.html

Advisory Council Shepherds: **Robert Seastrom**

29 January 2014

Problem Statement:

7.1 attempts to assert rules on rDNS management at ARIN. It fails to do so because it only addresses in-addr.arpa (missing equally important rules in ip6.arpa). It's also not based on any RFC; it's an arbitrary decision made by ARIN technical staff. We should remove this text from policy, as it represents operational practice rather than ARIN number policy.

Policy statement:

Remove 7.1

Comments:
a. Timetable for implementation: Immediate
b. Anything else:

7.1. Maintaining IN-ADDRs

All ISPs receiving one or more distinct /16 CIDR blocks of IP addresses from ARIN will be responsible for maintaining all IN-ADDR.ARPA domain records for their respective customers. For blocks smaller than /16, and for the segment of larger blocks smaller than /16, ARIN can maintain IN-ADDRs.

##########

ARIN Staff and Legal Assessment

ARIN-prop-2014-6 – "Remove 7.1"

Date of Assessment: 04 Mar 2014

1. Summary (Staff Understanding)

This proposal would remove NRPM section 7.1 on the grounds that it is missing rules on ip6.arpa and that it is not based on any RFC, but rather on operational practice.

2. Comments

A. ARIN Staff Comments
· Staff believes that the removal of section 7.1 would have no operational impact.
· This proposal could be implemented as written.

B. ARIN General Counsel - Legal Assessment
The policy does not create legal concerns.

3. Resource Impact

This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees.

4. Proposal Text

Problem Statement:
7.1 attempts to assert rules on rDNS management at ARIN. It fails to do so because it only addresses in-addr.arpa (missing equally important rules in ip6.arpa). It's also not based on any RFC; it's an arbitrary decision made by ARIN technical staff. We should remove this text from policy, as it represents operational practice rather than ARIN number policy.

Policy statement:

Remove 7.1

Comments:
• Timetable for implementation: Immediate

• Anything else:

Draft Policy ARIN-2014-8

Alignment of 8.3 Needs Requirements to Reality of Business

https://www.arin.net/policy/proposals/2014_8.html

Advisory Council Shepherds: **Kevin Blumberg, Milton Mueller**

4 March 2014

Problem Statement:

8.3 Transfer Policy states: "The recipient must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA." This is problematic post-exhaustion for two reasons:

1) Existing IPv4 policy for end-users requires that the organization demonstrate they will use TWENTY-FIVE PERCENT of the space immediately.

ARIN staff interpret "immediately" to mean "within 30 days of obtaining new numbers." NRPM 8.3, however, allows networks to obtain a 2-year supply of addresses. It is, therefore, not rational to expect businesses to use 25% of the space obtained for a 2-year need within 30 days. Such a requirement has, consistently, prompted requestors to bend the truth in their dealings with ARIN in order to qualify for the space they need to operate their network.

2) IPv4 policy for ISPs requires existing utilization of some number of IPv4 addresses. There is a barrier to entry for new ISPs, designed in 1996 to ensure that DFZ slots were utilized by bona fide networks. This requirement freezes out new ISP entrants from the 8.3 transfer market. This formally disallows new ISPs to obtain properly-sized blocks for their future needs from the market.

This proposal aims to easily fix the math problem in 1), and the blocker to business in 2).

Policy statement:

Replace in 8.3:

"The recipient must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA."

with

"The recipient must demonstrate their 24 month needs for number resources. The transferred block(s) plus the amount of free addresses currently registered to the organization, must together not be larger than the demonstrated need. The recipient must sign an RSA."

Comments:
a. Timetable for implementation: Immediate

b. Anything else: Request that ARIN STAFF analyze whether the third sentence of the proposed text ("The recipient must sign an RSA.") needs to be in ARIN policy. If not, let's work together to modify this proposal to remove it.

Draft Policy ARIN-2014-9
Resolve Conflict Between RSA and 8.2 Utilization Requirements

https://www.arin.net/policy/proposals/2014_9.html

Advisory Council Shepherds: **Heather Schiller, Scott Leibrand**

16 May 2014

Problem Statement:

8.2 transfer policy has utilization requirements at the time of the review of the transfer request.

The RSA section 6 expressly forbids ARIN from de-registering blocks (in whole or in part) due to under-utilization or no-justification during transfer requests.

This is a direct conflict.

Policy statement:

Remove the words "aggregate" and "reclaim" from 8.2, so it reads:

"In the event that number resources of the combined organizations are no longer justified under ARIN policy at the time ARIN becomes aware of the transaction, through a transfer request or otherwise, ARIN will work with the resource holder(s) to return or transfer resources as needed to restore compliance via the processes outlined in current ARIN policy."

Comments:

a.Timetable for implementation: Immediate

b.Anything else:

The RSA section 6 expressly forbids ARIN from de-registering blocks (in whole or in part) due to under-utilization or no-justification during transfer requests.

This is a direct conflict.

Return and aggregate are not done in collaboration; they are coerced by policy without the willing consent of the transfer parties.

We should remove all utilization references from 8.2 language to ensure the policy is compliant with the RSA.

Policy statement:

Remove from 8.2:
"In the event that number resources of the combined organizations are no longer justified under ARIN policy at the time ARIN becomes aware of the transaction, through a transfer request or otherwise, ARIN will work with the resource holder(s) to return, aggregate, transfer, or reclaim resources as needed to restore compliance via the processes outlined in current ARIN policy."

Comments:
a. Timetable for implementation: Immediate

b. Anything else:

#####

Older version

Draft Policy ARIN-2014-9
Resolve Conflict Between RSA and 8.2 Utilization Requirements

Date: 4 March 2014

Problem Statement:

8.2 transfer policy has utilization requirements at the time of the review of the transfer request.

https://www.arin.net/policy/proposals/2014_11.html

Advisory Council Shepherds: **Kevin Blumberg, Bill Darte**

20 May 2014

Problem Statement

The importance of maintaining accurate records in the ARIN database is recognized as one of the Registries main tasks. Currently, ARIN policy does not clearly state the registry services to be provided to non-contracted legacy resource holders and the policy for use of such services.

Policy Changes

Section 2, Adds to "Definitions"

Legacy Resource Holder

An entity who has been previously issued Number Resources prior to ARIN's inception on December 22, 1997 in its service area.

Legacy Resources

A Number Resource including Autonomous system numbers and IP address space issued to a Legacy Resource Holder.

Non Contracted Legacy Holder

A Legacy Resource Holder that has Legacy Resources not specifically covered under a Resource Agreement.

Section 13 Legacy Resources

Services
ARIN has historically provided a number of services to Legacy Resource Holders under contract as well as Non Contracted Legacy Resource Holders. ARIN as part of its stewardship role in Internet Number resources will provide the following services:

1. Legacy Resource Holders
a. Registry Update Services including:
i. Address
ii. Point of Contact(s)
iii. Reverse DNS delegation
iv. Reassignment through SWIP or RWhois
v. Resource Public Key Infrastructure (RPKI)
vi. Corporate Name Changes

2. Non Contracted Legacy Holders
a. Registry Update Services including:
i. Address
ii. Point of Contacts(s)
iii. Reverse DNS delegation
#####

Older version

Date: 4 March 2014

Problem Statement

The importance of maintaining accurate records in the ARIN database is recognized as the Registries principal task and is not being debated. The Registry is unable to responsibly fulfill this task. Many resource holders are not incented through mutual benefits to participate in the registry, the process or the community and instead operate successfully outside of its bounds further hampering the mission of accuracy.

Intent

To create a sustainable RIPE 605-like environment in the ARIN region that provides mutual benefits to legacy holders and ARIN and in support of vastly improved and accurate registry service.

Policy Changes

Section 1, Adds to "Principles"

Accuracy

The principle of Accuracy guarantees stakeholders that all reasonable and mutually beneficial steps will be take to insure that the Registry is as accurate as possible.

Fairness

The principle of Fairness guarantees stakeholders that they will be treated fairly with respect to whatever class of resources they hold, whether they are pre or post RIR assigned addresses.

Value Add

The principle of Value Add guarantees that the Registry, in its effort to insure that all of the principles are applied equitably, will seek to add value to all resource holders regardless of class by insuring such thing as rapid update functionalities and reasonably easy transfer administration.

Mutual Benefit

The principle of Mutual Benefit guarantees that ARIN will enter into or dissolve contracts related to legacy resource holders in like fashion of comparable Registries. Section 2, Adds to "Definitions"

Legacy Internet Resource

Any Internet Resource obtained prior to or otherwise outside the current system of hierarchical distribution (by allocation or assignment) through the Regional Internet Registries.

Legacy Internet Resource Holder

The holder of a Legacy Internet Resource. Either by receiving these resources directly or by receiving (part of) Legacy Internet Resources from a Legacy Internet Resource Holder.

Registry Service Element

In practice, any Legacy Resource Holder actually avails of a subset of the Registry Services mentioned above. Where it is necessary to distinguish between the entire class of Registry Services and the specific Registry Services actually provided in a particular case, the latter are described as Registry Service Elements.

https://www.arin.net/policy/proposals/2014_12.html

Advisory Council Shepherds: **David Farmer, Cathy Aronson**

19 May 2014

AC's assessment of conformance with the Principles of Internet Number Resource Policy:

ARIN-2014-12: Anti-hijack Policy enables fair, impartial, and technically sound number resource administration by updating the guidelines for the allocation of experimental resources to ensure all such allocation are documented in Whois, noting their experimental status, and provides these allocations may not overlap any other allocations. This policy appears strongly supported and non-controversial.

Problem Statement:

ARIN should not give research organizations permission to hijack prefixes that have already been allocated. Research organizations announcing lit aggregates may receive sensitive production traffic belonging to live networks during periods of instability.

Section 11.7 describes more than allocation size therefore updating the section heading to something more accurate is appropriate.

Policy statement:

Modify the section 11.7 heading to be more accurate. Modify the first sentence to prohibit overlapping assignments. Add text at the end to define how research allocations should be designated.

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 should be consistent with the existing ARIN minimum allocation sizes, unless small allocations are intended to be explicitly part of the experiment. If an organization requires more resource than stipulated by the minimum allocation sizes in force at the time of their request, their experimental documentation should have clearly described and justified why this 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.

Comments:

a. Timetable for implementation: Immediate

b. Anything else:

#####

ARIN STAFF ASSESSMENT

Assessment of: Draft Policy ARIN-2014-12: Anti-hijack Policy

Date of Assessment:

1. Summary (Staff Understanding)

This policy would clarify expectations for experimental allocations by requiring that all experimental allocations come from ARIN's Internet Resource space, do not overlap any existing registrations, not be private or otherwise un-routable space, and be registered in Whois with a designation indicating that the registration is experimental with a comment indicating the end date of the experiment.

2. Comments

A. ARIN Staff Comments

This policy could be implemented as written.

B. ARIN General Counsel - Legal Assessment

The policy poses no significant legal issues.

3. Resource Impact

This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

· Updated guidelines and internal procedures

· Staff training

4. Proposal/Draft Policy Text Assessed
Draft Policy ARIN-2014-12: Anti-hijack Policy

Date: 18 April 2014

Problem Statement:

ARIN should not give research organizations permission to hijack prefixes that have already been allocated. Research organizations announcing lit aggregates may receive sensitive production traffic belonging to live networks during periods of instability.
Section 11.7 describes more than allocation size therefore updating the section heading to something more accurate is appropriate.

Policy statement:

Modify the section 11.7 heading to be more accurate. Modify the first sentence to prohibit overlapping assignments. Add text at the end todefine how research allocations should be designated.

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 should be consistent with the existing ARIN minimum allocation sizes, unless small allocations are intended to be explicitly part of the experiment. If an organization requires more resource than stipulated by the minimum allocation sizes in force at the time of their request, their experimental documentation should have clearly described and justified why this 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.

Comments:
a. Timetable for implementation: Immediate

b. Anything else:

https://www.arin.net/policy/proposals/2014_13.html

Advisory Council Shepherds: **Kevin Blumberg, Bill Darte**

20 May 2014

AC's assessment of conformance with the Principles of Internet Number Resource Policy:

Draft Policy ARIN-2014-13: Reduce All Minimum Allocation/ Assignment Units to /24 - This proposal will lower all allocation(s) and assignment(s) of IPv4 address in section 4.2 and 4.3 to a /24 minimum. The policy would also remove section 4.9 as the allocation and assignment sizes were now larger than 4.2 and 4.3. As noted in the staff report it will also remove the maximum initial allocation that was used with the examples in 4.2.2.2. The changes to the NRPM are fair in that they would treat all resource applicants equally. They are technically sound and have received support from the community.

Problem Statement:

As we approach runout, more and more end users and smaller ISPs will be unable to obtain space from their upstreams and will be seeking space from ARIN. In order to meet these needs to the extent possible and to make policy more fair to a broader range of the ARIN constituency, we should reduce the minimum assignment and allocation units for IPv4 to /24 across the board.

Policy statement:

Remove all references to minimum allocations /20 and /22 replacing them with the term allocation or with /24 when referencing minimum size blocks.

Change the title of 4.2.2.1 to "ISP Requirements" with revised text stating:

All ISP organizations must satisfy the following requirements...thus eliminating the entire Multi-homed section and subsections along with other superfluous example text.

Delete the special case allocations/assignments for the Caribbean as the new /24 minimums are an improvement.

Comments:
a. Timetable for implementation: Immediate b. A red line version has been included

Full text version of changes for easy reference:

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.

4.2.2.1 ISP Requirements
All ISP organizations must satisfy the following requirements:

4.2.2.1.1 Use of /24
The efficient utilization of an entire previously allocated /24 from their upstream ISP. This allocation may have been provided by an ISP s upstream provider(s), and does not have to be contiguous address space.

4.2.2.1.3. Three months
Provide detailed information showing specifically how the requested allocation will be utilized within three months.

4.2.2.1.4. Renumber and return
ISPs receiving a new allocation may wish to renumber out of their previously allocated space. In this case, an ISP must use the new allocation to renumber out of that previously allocated block of address space and must return the space to its upstream provider.

4.2.2.2. [section number retired]

4.3.2 Minimum assignment

4.3.2.1. [section moved to 4.3.2]
The minimum block of IP address space assigned by ARIN to end-users is a /24. If assignments smaller than /24 are needed, end-users should contact their upstream provider.

4.3.2.2 [section number retired]

4.9 [section number retired]

##########

ARIN STAFF ASSESSMENT
Assessment of: ARIN-prop-208 Reduce All Minimum Allocation/ Assignment Units to /24
Date of Assessment: 11 May 2014

1. Summary (Staff Understanding)

This policy would reduce the minimum allocation/assignment size to /24 for all networks, whether end user or ISP and whether single or multi-homed. Additionally, it would eliminate the existing multi-homed policies.

2. Comments

A. ARIN Staff Comments

1. It is not clear in this proposal what criteria would be used to determine any allocation size other than a /24. Current policy provides clear criteria for how to qualify for a /22, /21, and a /20. Would the same criteria still apply for organizations that request more than an initial allocation of a/24?

2. Staff uses current criteria defined in 4.2.2.1.1 in conjunction with section 4.2.1.4 (slow start) to establish a de facto /20 maximum initial allocation size for ISPs new to ARIN. Staff would recommend that a maximum initial allocation size of a /20 be noted in section 4.2.1.5 to codify existing practice and provide clarity, and that it be renamed to Minimum and Maximum Allocation.

3. This proposal would benefit smaller ISPs who are unable to qualify currently under ARIN IPv4 policies, and particularly would be unable to qualify for 8.3 and 8.4 transfers in a post-depletion world. *Note, this was a point raised in the policy experience report in Chicago.

4. ARIN will likely have many discontiguous /24s as we near depletion and fewer and fewer larger prefixes. This policy would actually allow more organizations to use these smallest prefixes, thus ensuring the efficient run-out of ARIN's IPv4 address pool.

B. ARIN General Counsel - Legal Assessment

This proposal does not appear to pose any legal risk.

3. Resource Impact
This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees.

The following would be needed in order to implement:
Updated guidelines and internal procedures
Staff training

4. Proposal/Draft Policy Text Assessed
ARIN-prop-208 Reduce All Minimum Allocation/Assignment Units to /24

Problem Statement:
As we approach runout, more and more end users and smaller ISPs will be unable to obtain space from their upstreams and will be seeking space from ARIN. In order to meet these needs to the extent possible and to make policy more fair to a broader range of the ARIN constituency, we should reduce the minimum assignment and allocation units for IPv4 to /24 across the board.

Policy statement:
Remove all references to minimum allocations /20 and /22 replacing

them with the term allocation or with /24 when referencing minimum size blocks.

Change the title of 4.2.2.1 to "ISP Requirements" with revised text stating:
All ISP organizations must satisfy the following requirements...thus eliminating the entire Multi-homed section and subsections along with other superfluous example text.

Delete the special case allocations/assignments for the Caribbean as the new /24 minimums are an improvement.

Text assessed:

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.

4.2.2.1 ISP Requirements
All ISP organizations must satisfy the following requirements:

4.2.2.1.1 Use of /24
The efficient utilization of an entire previously allocated /24 from their upstream ISP. This allocation may have been provided by an ISPs upstream provider(s), and does not have to be contiguous address space.

4.2.2.1.4. Renumber and return
ISPs receiving a new allocation may wish to renumber out of their previously allocated space. In this case, an ISP must use the new allocation to renumber out of that previously allocated block of address space and must return the space to its upstream provider.

4.2.2.2. [section number retired]

4.3.2 Minimum assignment

4.3.2.1. [section moved to 4.3.2]
The minimum block of IP address space assigned by ARIN to end-users is a /24. If assignments smaller than /24 are needed, end-users should contact their upstream provider.

4.3.2.2 [section number retired]

Draft Policy ARIN-2014-14
Removing Needs Test from Small IPv4 Transfers

https://www.arin.net/policy/proposals/2014_14.html

Advisory Council Shepherds: **John Springer, Andrew Dul**

16 May 2014

Problem Statement:

ARIN staff, faced with a surge in near-exhaust allocations and subsequent transfer requests and a requirement for team review of these, is spending scarce staff time on needs testing of small transfers. This proposal seeks to decrease overall ARIN processing time through elimination of that needs test.

Policy statement:

Change the language in NRPM 8.3 after Conditions on the recipient of the transfer: from "The recipient must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA." to "For transfers larger than a /16 equivalent or for recipients who have completed a needs-free transfer in the prior year, the recipient must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA."

Change the language in the third bullet point in NRPM 8.4 after Conditions on the recipient of the transfer: from "Recipients within the ARIN region must demonstrate the need for up to a 24-month supply of IPv4 address space." to "For transfers larger than a /16 equivalent or for recipients who have completed a needs-free transfer in the prior year, recipients in the ARIN region must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA."

Comments:

Needs testing has been maintained for transfers largely because the community wishes to ensure protection against hoarding and speculation in the IPv4 market. This proposal seeks a middle ground between the elimination of needs tests for transfers altogether, and the continuance of needs tests for every transfer. This should help ARIN staff to reduce transfer processing time, since most transfers have been smaller than /16.

Timetable for implementation: Immediate

Draft Policy ARIN-2014-15
Allow Inter-RIR ASN Transfers

https://www.arin.net/policy/proposals/2014_15.html

Advisory Council Shepherds: **Scott Leibrand, David Farmer**

16 May 2014

Problem Statement:

We already allow transfer of ASNs within the ARIN region. Recently APNIC implemented a policy allowing for Inter-regional ASN transfers to RIRs with reciprocal policies. This change in language would allow for ASN transfers to and from the APNIC region.

Policy Statement:

Add "or ASNs to be transferred, as" to the first bullet point under Conditions on source of the transfer, so that it reads: "The source entity must be the current rights holder of the IPv4 address resources or ASNs to be transferred, as recognized by the RIR responsible for the resources, and not be involved in any dispute as to the status of those resources."

Change "IPv4 number resources" to "IPv4 number resources or ASNs", so that the fourth bullet point reads: "Source entities within the ARIN region must not have received a transfer, allocation, or assignment of IPv4 number resources or ASNs from ARIN for the 12 months prior to the approval of a transfer request. This restriction does not include M&A transfers."

Timetable for implementation: Immediate

Draft Policy ARIN-2014-16
Section 4.10 Austerity Policy Update

https://www.arin.net/policy/proposals/2014_16.html

Advisory Council Shepherds: **Dan Alexander, Cathy Aronson**

16 May 2014

Problem Statement:

NRPM section 4.10 defines an IPv4 to IPv6 transition pool which was intended to be used by new entrants after the IPv4 free pool has been exhausted. This policy was written prior to exhaustion in the APNIC and RIPE region and has largely not been used to date. It is believed that the current policy may be too restrictive to be useful to many organizations within the ARIN region. Furthermore the during the ARIN 33 public policy meeting experience report (1), ARIN staff noted issues with the current IPv4 policy after the IPv4 free pool is exhausted.

RIPE & APNIC adopted an "austerity" policy which allows organizations to obtain a small single block directly from the registry. These policies appear to have been quite effective at getting IPv4 resources to organizations without address space after IPv4 exhaustion. Learning from other regions, we have crafted a policy to update section 4.10 to adopt some of the policy text from the RIPE & APNIC region while looking at the unique aspects of the ARIN region's number resource needs.

Policy statement:

Replace Section 4.10 with the following policy.

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 and continued transition from IPv4 to IPv6.

Address space received from IANA under the "Global Policy for Post Exhaustion IPv4 Allocation Mechanisms by the IANA (NRPM 10.5)" by ARIN shall be allocated or assigned under this section.

Allocations and assignments from this block must be justified by immediate IPv6 deployment requirements. Organizations must obtain an IPv6 block to receive a block under section 4.10 and show documentation on how the IPv6 and IPv4 block will be used to facilitate an organization's operational needs.

This block will be subject to a minimum size allocation of /28 and a maximum size allocation of /22. ARIN shall use sparse allocation within these blocks.

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

1. the organization, nor it parent(s) or subsidiary organizations, may not have received IPv4 resources greater than or equal to a /22 from ARIN or any other RIR;

2. the organization must show immediate use (within 30 days) of 25% of the allocation;

3. the organization is eligible to receive only one contiguous IPv4 block under this section;

4. the organization may apply to ARIN for an increase in their allocation up to a /22, if the previous allocation under this section shows a utilization of at least 80%, increases will only be granted if adjacent bit-boundary aligned space is available at the time of request.

Comments:
a. Timetable for implementation: immediately

b. Anything else: (1) https://www.arin.net/participate/meetings/reports/ARIN_33/PDF/monday/nobile_policy.pdf

https://www.arin.net/policy/proposals/2014_15.html

Advisory Council Shepherds: **Andrew Dul, Owen DeLong**

16 May 2014

Problem Statement:

Utilization requirements for new requests is being calculated on a per allocation basis rather than in aggregate. For example, if an organization has 4 x /22 and 3 of them are utilized 100% and the fourth utilized at 75%, that request would be denied. This is a bit out of balance as an organization with a single /20 utilized at 80% would have less efficient utilization but would be eligible to request additional space.

Policy statement:

Section 4.2.4.1- Change text to read: "ISPs must have efficiently utilized all previous allocations, in aggregate, to at least 80% in order to receive additional space. This includes all space reassigned to their customers. Please note that until your prior utilization is verified to meet the 80% requirement, ARIN can neither process nor approve a request for additional addresses."

Section 4.3.6.1- Change text to read: "End-users must have efficiently utilized all previous assignments, in aggregate, to at least 80% in order to receive additional space, and must provide ARIN with utilization details. The prefix size for an additional assignment is determined by applying the policies found in Section 4.3 of the NRPM."

Comments:
a. Timetable for implementation: Immediate, possibly through board action.

b. Per originator, This does not currently extend into MDN (aka 4.5.4), and I'm not really sure how to reconcile it against 4.5.5, but OP expressed some concern that there may be undue restrictions there. It might be better served by a separate proposal.

c. There should probably also be an attempt to clean up the language between 4.2.4.1 and 4.3.6.1, as they're both currently very clunky.

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. 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.
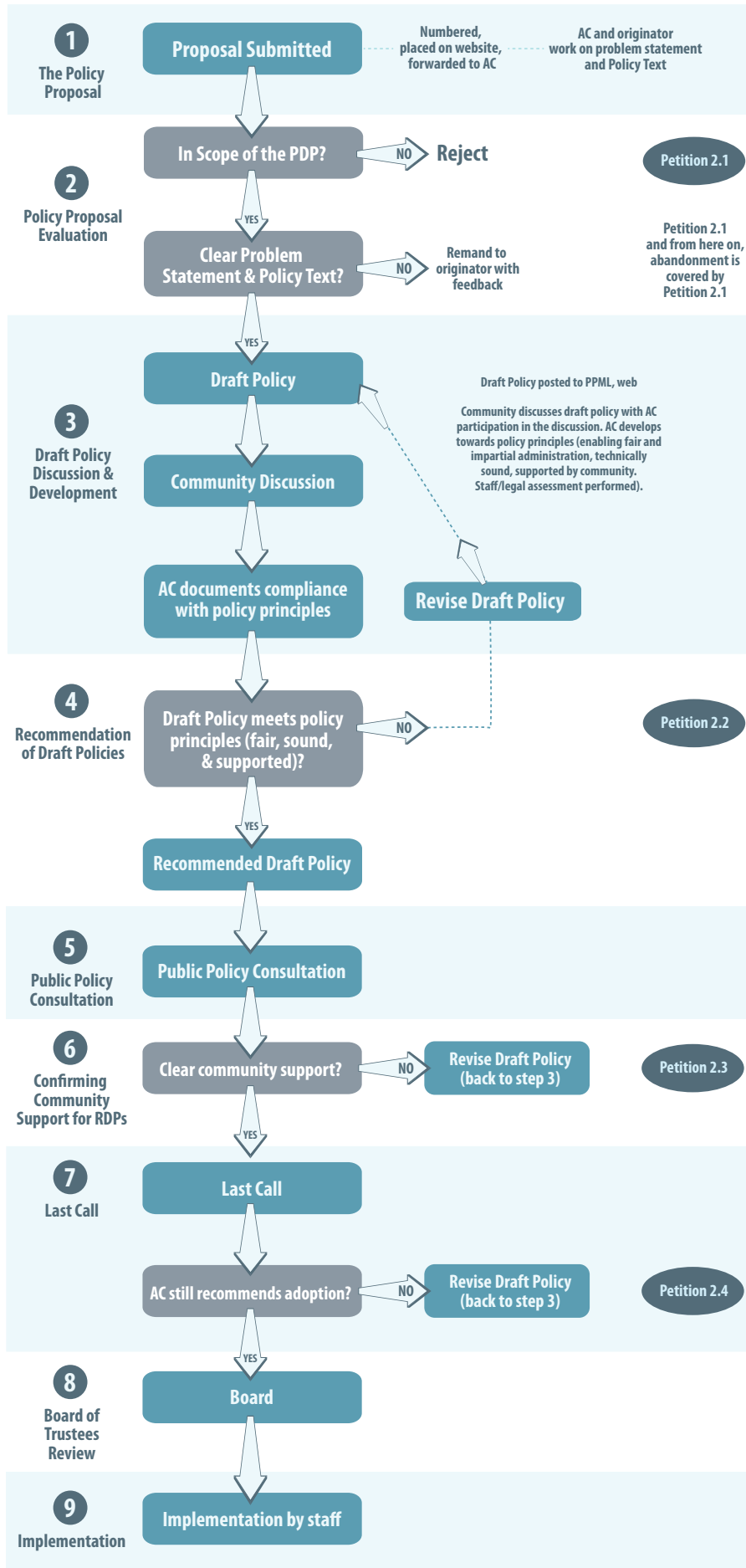
2.3. Petition for Last Call

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.

PDP Flowchart

1 Proposal Submitted — Numbered, placed on website, forwarded to AC — AC and originator work on problem statement and Policy Text

The Policy Proposal

2 In Scope of the PDP? — NO → Reject — Petition 2.1

Policy Proposal Evaluation

YES

Clear Problem Statement & Policy Text? — NO → Remand to originator with feedback — Petition 2.1 and from here on, abandonment is covered by Petition 2.1

YES

3 Draft Policy — Draft Policy posted to PPML, web

Draft Policy Discussion & Development

Community discusses draft policy with AC participation in the discussion. AC develops towards policy principles (enabling fair and impartial administration, technically sound, supported by community. Staff/legal assessment performed).

Community Discussion

AC documents compliance with policy principles ← Revise Draft Policy

4 Draft Policy meets policy principles (fair, sound, & supported)? — NO — Petition 2.2

Recommendation of Draft Policies

YES

Recommended Draft Policy

5 Public Policy Consultation

Public Policy Consultation

6 Clear community support? — NO → Revise Draft Policy (back to step 3) — Petition 2.3

Confirming Community Support for RDPs

YES

7 Last Call

Last Call

AC still recommends adoption? — NO → Revise Draft Policy (back to step 3) — Petition 2.4

YES

8 Board

Board of Trustees Review

9 Implementation by staff

Implementation

30

Appendix B: PROPOSAL TEMPLATE

Guidelines for Completing the ARIN Policy Proposal Template are available at: **https://www.arin.net/policy/pdp_appendix_b.html**

TEMPLATE: ARIN-POLICY-PROPOSAL-TEMPLATE-3.0

1. Policy Proposal Name:

2. Proposal Originator

    a. name:

    b. email:

    c. telephone:

    d. organization:

3. Date:

4. Problem Statement:

5. Policy statement:

6. Comments:

    a. Timetable for implementation:
    b. Anything else

END OF TEMPLATE

ARIN
American Registry for Internet Numbers

Number Resource Policy Manual

Version 2014.2 - 21 January 2014

Abstract

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.

Contents

For more information, visit us at www.arin.net.

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 space is distributed globally in accordance with the hierarchical structure shown below.
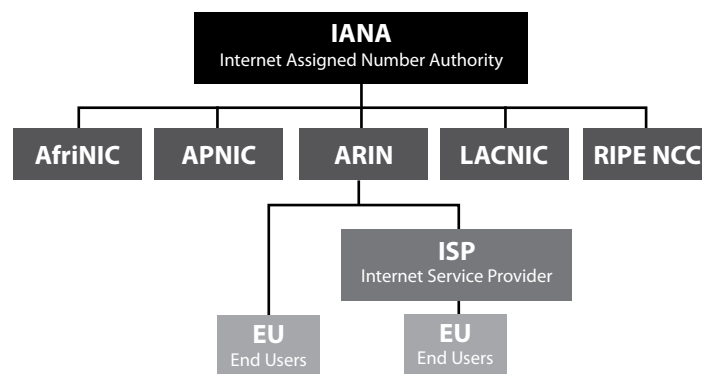
2.1. Internet Registry (IR)

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. [section number 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. Allocate and Assign

A distinction is made between address allocation and address assignment, i.e., ISPs are "allocated" address space as described herein, while end-users are "assigned" address space.

Allocate - To allocate means to distribute address space to IRs for the purpose of subsequent distribution by them.

Assign - To assign means to delegate address space to an ISP or end-user, for specific use within the Internet infrastructure they operate. Assignments must only be made for specific purposes documented by specific organizations and are not to be sub-assigned to other parties.

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. Utilization (IPv6)

In IPv6, "utilization" is only measured in terms of the bits to the left of the /56 boundary. In other words, utilization refers to the assignment of /56s to end sites, and not the number of addresses assigned within individual /56s at those end sites.

2.9. HD-Ratio

The HD-Ratio is a way of measuring the efficiency of address assignment (RFC 3194). It is an adaptation of the H-Ratio originally defined in (RFC1715) and is expressed as follows:

$$HD = \frac{\text{Log (number of allocated objects)}}{\text{Log (maximum number of allocatable objects)}}$$

where (in the case of this document) the objects are IPv6 site addresses (/56s) assigned from an IPv6 prefix of a given size.

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 any network organized and operated by a volunteer group operating as or under the fiscal support of a nonprofit organization or university for the purpose of providing free or low-cost connectivity to the residents of their local service area. To be treated as a community network under ARIN policy, the applicant must certify to ARIN that the community network staff is 100% 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*100, for a /36 3072/4096 * 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 Server Use Requirements

The minimal requirements for an organization to setup a distributed information service to advertise reassignment 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 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 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, 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 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 it 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 Whois POC Validation

3.6.1 Method of Annual Verification

During ARINs annual Whois POC validation, an email will be sent to every POC in the Whois database. Each POC will have a maximum of 60 days to respond with an affirmative that their Whois contact information is correct and complete. Unresponsive POC email addresses shall be marked as such in the database. If ARIN staff deems a POC to be completely and permanently abandoned or otherwise illegitimate, the POC record shall be marked invalid. ARIN will maintain, and make readily available to the community, a current list of number resources with no valid POC; this data will be subject to the current bulk Whois policy.

4. IPv4

4.1. General Principles

4.1.1. Routability

Provider independent (portable) addresses issued directly from ARIN or other Regional Registries are not guaranteed to be globally routable. Therefore, ISPs should consider the following order of priority when requesting IP address space:

- Request IP address space from upstream provider
- Request IP address space from provider's provider
- Request IP address space from ARIN (not guaranteed to be globally routable)

4.1.2., 4.1.3., 4.1.4. [section number retired]

4.1.5. Determination of IP address allocation size

Determination of IP address allocation size 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. RFC 2050

ARIN takes guidance from allocation and assignment policies and procedures set forth in RFC 2050. These guidelines were developed to meet the needs of the larger Internet community in conserving scarce IPv4 address space and allowing continued use of existing Internet routing technologies.

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. Returned IPv4 Addresses

Until a global policy which clearly defines a mechanism for the re-allocation of IPv4 addresses returned to the IANA is adopted by all five regions and implemented at the IANA; all IPv4 addresses returned to, recovered, or revoked by ARIN will be made available for allocation or assignment in the ARIN region as quickly as practicable.

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 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 /20 and larger IP address prefixes to ISPs. If allocations smaller than /20 are needed, ISPs should request address space from their upstream provider. For multihomed ISPs, ARIN allocates /22 and larger IP address prefixes. If allocations smaller than /22 are needed, multihomed ISPs should request address space from their upstream provider.

4.2.1.6. Immediate need

If an ISP has an immediate need for address space, and can provide justification to show that the address space will be utilized within 30 days of the request, ARIN may issue a block of address space, not larger than a /16 nor smaller than ARIN's customary minimum allocation, to that organization. These cases are exceptional.

4.2.2. Initial allocation to ISPs

4.2.2.1. Standard or non-multihomed

Organizations that do not meet the requirements described in the multihomed section below (Section 4.2.2.2) must satisfy the following requirements:

4.2.2.1.1. Use of /20

The efficient utilization of an entire previously allocated /20 from their upstream ISP. This /20 allocation may have been provided by an ISP's upstream provider(s), and does not have to be contiguous address space. The organization must meet the requirement of efficient use of 16 /24s. For example, if an organization holds a smaller allocation, such as 12 /24s, from its upstream provider, the organization would not meet the minimum utilization requirements of a /20.

4.2.2.1.2. Efficient utilization

Demonstrate efficient use of IP address space allocations by providing appropriate documentation, including assignment histories, showing their efficient use. ISPs must provide reassignment information on the entire previously allocated block(s) via SWIP or RWhois server for /29 or larger blocks. For blocks smaller than /29 and for internal space, ISPs should provide utilization data either via SWIP or RWhois server or by providing detailed utilization information.

4.2.2.1.3. Three months

Provide detailed information showing specifically how a /20 will be utilized within three months.

4.2.2.1.4. Renumber and return

ISPs receiving a new /20 may wish to renumber out of their previously allocated space. In this case, an ISP must use the new /20 to renumber out of that previously allocated block of address space and must return the space to its upstream provider.

4.2.2.2. Multihomed

When prefixes are allocated which are smaller than /20, they will be from a block reserved for that purpose. In order to receive an initial allocation from ARIN, organizations applying under the multihomed policy must:

- When requesting a /22, demonstrate the efficient utilization of a minimum contiguous or noncontiguous /23 (two /24s) from an upstream.
- When requesting a /21, demonstrate the efficient utilization of a minimum contiguous or noncontiguous /22 (four /24s) from an upstream.
- When requesting a /20, demonstrate the efficient utilization of a minimum contiguous or noncontiguous /21 (eight /24s) from an upstream.

4.2.2.2.1. Efficient utilization

Provide reassignment information for /29 and larger blocks using the Shared Whois Project (SWIP) or by providing the same information fields in an RWhois server. If additional address space is later requested, this information must be available at the time of the request. Utilization for blocks smaller than /29 can be documented via SWIP or RWhois server or by providing detailed utilization information.

4.2.2.2.2. Three months

Provide information showing that the requested IP address space will be utilized within three months and demonstrating an intent to announce the requested space in a multihomed fashion.

4.2.2.2.3. Renumber and return

Agree that the newly requested IP address space will be used to renumber out of the current addresses which will be returned to their upstream provider(s).

4.2.2.2.4. Additional requests following the initial allocation

To receive additional address space following the initial allocation, multihomed organizations must have returned the original IP address space to its provider in its entirety and must provide justification for a new allocation as described above in the section titled Requirements for Requesting Initial Address Space.

4.2.3. Reassigning 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. 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 information for prior allocations must show that each customer meets the 80% utilization criteria and must be available via SWIP/RWhois 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. ARIN approval of reassignments/reallocations

4.2.3.5.1. /18

All extra-large ISPs making reassignments of a /18 or larger to a customer must first have these reassignments reviewed and approved by ARIN.

4.2.3.5.2. /19

Small to large ISPs making customer reassignments of a /19 or larger must first seek ARIN's approval.

4.2.3.5.3. Required documentation for pre-approval requests

- Network engineering plans - Network engineering plans including subnets, host counts, and hosts per subnet, with projected utilization rates and associated confidence levels of those projections for one and two years,
- Deployment schedule - Deployment schedule for the network, including major milestones for each subnet,
- Network topology diagrams.

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 Information

Each IPv4 assignment 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 registrations shall include each client's organizational information, except where specifically exempted by this policy.

4.2.3.7.2. Assignments visible within 7 days

All assignments shall be made visible as required in section 4.2.3.7.1 within seven calendar days of assignment.

4.2.3.7.3. Residential Subscribers

4.2.3.7.3.1. Residential Market Area

In most cases, ISPs that have residential subscribers assign address space to their access infrastructure to which their customers connect rather than to individual subscribers. This assignment information regarding each market area holding an address block should be entered via SWIP (or by using RWhois) with the network name used to identify each market area. Initial allocations are based on total number of homes that could purchase the service in a given market area.

Using SWIP or RWhois, residential access ISPs must show that they have reassigned at least 80% of their current address space, with a 50 to 80% utilization rate, in order to request additional addresses.

Each assignment to a specific end-user (if holding /29 and larger blocks) requires the submission of a SWIP or use of an RWhois server. Requesters will also be asked to provide detailed plans for use of the newly requested space.

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 directory 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 three 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 previous allocations and at least 80% of their most recent allocation in order to receive additional space. This includes all space reassigned to their customers. Please note that until your prior utilization is verified to meet the 80% requirement, ARIN can neither process nor approve a request for additional addresses.

4.2.4.2. Return address space as agreed

Return prior address space designated for return as agreed.

4.2.4.3. Subscriber Members Less Than One Year

Provide detailed information showing specifically that the address space will be utilized within three months.

4.2.4.4. Subscriber Members After One Year

After an organization has been a subscriber member of ARIN for one year, they may choose to request up to a 12-month supply of IP addresses.

When ARIN receives its last /8, by IANA implementing section 10.4.2.2, the length of supply that an organization may request will be reduced. An organization may choose to request up to a 3-month supply of IP addresses.

4.2.5. Web Hosting Policy

When an ISP submits a request for IP address space to be used for IP-based web hosting, it will supply (for informational purposes only) its technical justification for this practice. ARIN will analyze this data continuously, evaluating the need for future policy change.

4.2.6. [Section Number 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

4.3.2.1. Single Connection

The minimum block of IP address space assigned by ARIN to end-users is a /20. If assignments smaller than /20 are needed, end-users should contact their upstream provider.

4.3.2.2. Multihomed Connection

For multihomed end-users who demonstrate an intent to announce the requested space in a multihomed fashion to two or more distinct ASNs not owned or controlled by the end-user, the minimum block of IP address space assigned is a /24. If assignments smaller than a /24 are needed, multihomed end-users should contact their upstream providers. When prefixes are assigned which are smaller than /20, they will be from a block reserved for that purpose so long as that is feasible.

4.3.3. Utilization rate

Utilization rate of address space is a key factor in justifying a new assignment of IP address space. Requesters must show exactly how previous address assignments have been utilized and must provide appropriate details to verify their one-year growth projection. The basic criteria that must be met are:

- A 25% immediate utilization rate, and
- A 50% utilization rate within one year.

A greater utilization rate may be required based on individual network requirements. Please refer to RFC 2050 for more information on utilization guidelines.

4.3.4. Additional considerations

End-users may qualify for address space under other policies such as Immediate need [4.2.1.6] or 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

In order to justify an additional assignment, end-users must have efficiently utilized at least 80% of all previous assignments, and must provide ARIN with utilization details. The prefix size for an additional assignment is determined by applying the policies found in Section 4.3 of the NRPM.

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 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.

ARIN will place an equivalent of a /16 of IPv4 address space in a reserve for Critical Infrastructure, as defined in section 4.4. If at the end of the policy term there is unused address space remaining in this pool, ARIN staff is authorized to utilize this space in a manner consistent with community expectations.

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:

   a. Regulatory restrictions for data transmission,

   b. Geographic distance and diversity between networks,

   c. 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.

4.6. Amnesty and Aggregation Requests

[NRPM sections 4.6 and 4.7 have been suspended by the ARIN Board of Trustees. See item 20 in the Board's minutes from their meeting on 6 January 2014.]

4.6.1 Intent of this policy

This policy is intended to allow the community and ARIN staff to work together with holders of address resources in the best interests of the community by facilitating the return of unused

address space and the aggregation of existing space in a manner which is in the best interests of both parties.

All transactions under this policy must either create greater aggregation (a reduction in the number of prefixes) or the return of address space. Transactions should only be accepted under this policy if they are in the interests of the community (e.g. they improve aggregation or result in a net reclamation of space).

4.6.2 No penalty for returning or aggregating

ARIN shall seek to make the return of address space as convenient and risk-free to the returning organization as possible. An organization with several non-contiguous blocks seeking to aggregate and return space at the same time should be accommodated if possible. If it is possible to expand one block, for example, to facilitate the return of other blocks, ARIN should do that.

4.6.3 Return should not force renumbering

An organization shall be allowed to return a partial block of any size to ARIN. For any return larger than a /24, ARIN shall not require that the non-returned portion of the block be renumbered unless the returning organization wishes to do so.

4.6.4 Timeframe for return

Any organization which is returning addresses under this policy shall negotiate with ARIN an appropriate timeframe in which to return the addresses after any new resources are received under this policy. In the case of a simple return, the timeframe shall be immediate. In the case where renumbering into new addresses out of existing addresses to be returned is required, the returning organization shall sign a contract with ARIN which stipulates a final return date not less than 6 months nor more than 18 months after the receipt of new addresses. If an organization misses this return date, but, ARIN believes the organization is working in good faith to complete the renumbering, ARIN may grant a single extension of 6-12 months as staff deems appropriate to the situation. Such an extension must be requested in writing (email to hostmaster@ arin.net) by the organization at least 15 days prior to the original expiration date.

4.6.5 RSA Required if new addresses received

Any organization which receives any additional addresses under this policy shall be required to sign an ARIN RSA which will apply to all new addresses issued and to any retained blocks which are expanded under this policy.

4.6.6 Annual contact required

Any organization which participates in this policy shall be required to sign an agreement stipulating that ARIN will attempt contact at least once per year via the contact mechanisms registered for the organization in Whois. Should ARIN fail to make contact, after reasonable effort the organization shall be flagged as "unreachable" in Whois. After six months in "unreachable" status, the organization agrees that ARIN may consider all resources held by the organization to be abandoned and reclaim such resources. Should the organization make contact with ARIN prior to the end of the aforementioned six month period and update their contact information appropriately, ARIN shall remove the "unreachable" status and the annual contact cycle shall continue as normal. If the organization pays annual fees to ARIN, the payment of annual fees shall be considered sufficient contact.

4.7. Aggregation Requests

[NRPM sections 4.6 and 4.7 have been suspended by the ARIN Board of Trustees. See item 20 in the Board's minutes from their meeting on 6 January 2014.]

If an organization, whether a member or non-member, ISP or end-user, relinquishes a group of portable, non-aggregatable address blocks to ARIN, they shall be allowed to receive a block in exchange, /24 or shorter, but no more than the shortest block that could contain all of the returned blocks. Exchanged space shall be returned within 12 months. If the gain in the number of addresses is greater than 4096, the aggregation request must be evaluated by the ARIN in accordance with the current IPv4 allocation policy. If all of the previous address blocks were maintained in the ARIN database without maintenance fees, the replacement space shall be as well, but if any one of the returned blocks had associated maintenance fees, then the replacement block shall also be subject to maintenance fees.

4.8. [section number retired]

4.9 Minimum Allocation for the Caribbean and North Atlantic Islands

The minimum IPv4 allocation size for ISPs from the Caribbean and North Atlantic Islands sector of the ARIN region is /22.

4.9.1. Allocation Criteria

- The requesting organization must show the efficient utilization of an entire previously allocated /22 from their upstream ISP. This allocation (/22) may have been provided by an ISP's upstream provider(s), and does not have to be contiguous address space. The organization must meet the requirement of efficient use of 4 /24s.
- Utilization Reporting and Justification. All other ARIN policies regarding the reporting of justification information for the allocation of IPv4 and IPv6 address space will remain in effect.

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 65535.

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. [section number 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::/3 to be global unicast address space that IANA may allocate to the RIRs. In accordance with RFC 2928, RFC 2373bis, IAB-Request, IANA has allocated initial ranges of global unicast IPv6 address space from the 2001::/16 address block to the existing RIRs. This document concerns the initial and subsequent allocations of the 2000::/3 unicast address space, for which RIRs formulate allocation and assignment policies.

6.2. [section number 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. [Section Number 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 Allocations 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 where N = P-(X+Y) and P is the organization's Provider Allocation Unit X is a multiple of 4 greater than 4/3*serving sites and Y is a multiple of 4 greater than 4/3*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 allocations according to the same policies and criteria as ARIN. In such a case, the prefixes necessary for such an allocation 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 allocations 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 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 assignments 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:

   • Shows utilization of 75% or more of their total address space

   • Shows utilization of more than 90% of any serving site

   • 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. Assignments from LIRs/ISPs

Assignments 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. Assignment to operator's infrastructure

An LIR may assign 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 assignment histories, showing their efficient use.

6.5.5.1. Reassignment information

Each static IPv6 assignment containing a /64 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 registrations shall include each client's organizational information, except where specifically exempted by this policy.

6.5.5.2. Assignments visible within 7 days

All assignments shall be made visible as required in section 4.2.3.7.1 within seven calendar days of assignment.

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 holding /64 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 record for that block.

6.5.6. Reverse lookup

When an RIR delegates IPv6 address space to an organization, it also delegates the responsibility to manage the reverse lookup zone that corresponds to the allocated IPv6 address space. Each organization should properly manage its reverse lookup zone. When making an address assignment, the organization must delegate to an assignee organization, upon request, the responsibility to manage the reverse lookup zone that corresponds to the assigned address.

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 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 it 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 Assignments

6.5.9.1. Qualification Criteria

To qualify for a direct assignment, a community network must demonstrate it will immediately provide sustained service to at least 100 simultaneous users and must demonstrate a plan to provide sustained service to at least 200 simultaneous users within one year. For community networks located in rural regions (population less than 2,500) or in the Caribbean and North Atlantic Islands Sector, the numbers in these qualification criteria may be relaxed at ARIN's discretion.

6.5.9.2. Initial Assignment Size

The minimum size of the assignment is /48. Organizations requesting a larger assignment must provide documentation of the characteristics of the Community Network's size and architecture that require the use of additional subnets. An HD-Ratio of .94 with respect to subnet utilization within the network must be met for all assignments larger than a /48. These assignments shall be made from a distinctly identified prefix and shall be made with a reservation for growth of at least a /44. This reservation may be assigned to other organizations later, at ARIN's discretion.

6.5.9.3. Subsequent Assignment Size

Additional assignments may be made when the need for additional subnets is justified. Justification will be determined based on a detailed plan of the network's architecture and the .94 HD-Ratio metric. When possible, assignments will be made from an aggregatable adjacent address block.

6.6. [section number retired]

6.7. Appendix A: HD-Ratio

The HD-Ratio is not intended to replace the traditional utilization measurement that ISPs perform with IPv4 today. Indeed, the HD-Ratio still requires counting the number of assigned objects. The primary value of the HD-Ratio is its usefulness at determining reasonable target utilization threshold values for an address space of a given size. This document uses the HD-Ratio to determine the thresholds at which a given allocation has achieved an acceptable level of utilization and the assignment of additional address space becomes justified.

The utilization threshold T, expressed as a number of individual /56 prefixes to be allocated from IPv6 prefix P,

can be calculated as:

$$T = 2^{((56-P)*HD)}$$

Thus, the utilization threshold for an organization requesting subsequent allocation of IPv6 address block is specified as a function of the prefix size and target HD ratio. This utilization refers to the allocation of /56s to end sites, and not the utilization of those /56s within those end sites. It is an address allocation utilization ratio and not an address assignment utilization ratio.

The following table provides equivalent absolute and percentage address utilization figures for IPv6 prefixes, corresponding to an HD-Ratio of 0.94.

P	56-P	Total /56s	Threshold	Util %
56	0	1	1	100.00%
55	1	2	2	95.90%
54	2	4	4	92.00%
53	3	8	7	88.30%
52	4	16	14	84.70%

P	56-P	Total /56s	Threshold	Util %
51	5	32	26	81.20%
50	6	64	50	77.90%
49	7	128	96	74.70%
48	8	256	184	71.70%
47	9	512	352	68.80%
46	10	1,024	676	66.00%
45	11	2,048	1,296	63.30%
44	12	4,096	2,487	60.70%
43	13	8,192	4,771	58.20%
42	14	16,384	9,153	55.90%
41	15	32,768	17,560	53.60%
40	16	65,536	33,689	51.40%
39	17	131,072	64,634	49.30%
38	18	262,144	124,002	47.30%
37	19	524,288	237,901	45.40%
36	20	1,048,576	456,419	43.50%
35	21	2,097,152	875,653	41.80%
34	22	4,194,304	1,679,965	40.10%
33	23	8,388,608	3,223,061	38.40%
32	24	16,777,216	6,183,533	36.90%
31	25	33,554,432	11,863,283	35.40%
30	26	67,108,864	22,760,044	33.90%
29	27	134,217,728	43,665,787	32.50%
28	28	268,435,456	83,774,045	31.20%
27	29	536,870,912	160,722,871	29.90%
26	30	1,073,741,824	308,351,367	28.70%
25	31	2,147,483,648	591,580,804	27.50%
24	32	4,294,967,296	1,134,964,479	26.40%
23	33	8,589,934,592	2,177,461,403	25.30%
22	34	17,179,869,184	4,177,521,189	24.30%
21	35	34,359,738,368	8,014,692,369	23.30%
20	36	68,719,476,736	15,376,413,635	22.40%
19	37	137,438,953,472	29,500,083,768	21.50%
18	38	274,877,906,944	56,596,743,751	20.60%
17	39	549,755,813,888	108,582,451,102	19.80%
16	40	1,099,511,627,776	208,318,498,661	18.90%
15	41	2,199,023,255,552	399,664,922,315	18.20%
14	42	4,398,046,511,104	766,768,439,460	17.40%
13	43	8,796,093,022,208	1,471,066,903,609	16.70%
12	44	17,592,186,044,416	2,822,283,395,519	16.00%
11	45	35,184,372,088,832	5,414,630,391,777	15.40%
10	46	70,368,744,177,664	10,388,121,308,479	14.80%
9	47	140,737,488,355,328	19,929,904,076,845	14.20%
8	48	281,474,976,710,656	38,236,083,765,023	13.60%
7	49	562,949,953,421,312	73,357,006,438,603	13.00%
6	50	1,125,899,906,842,620	140,737,488,355,328	12.50%
5	51	2,251,799,813,685,250	270,008,845,646,446	12.00%
4	52	4,503,599,627,370,500	518,019,595,058,136	11.50%

6.8. [section number retired]

6.9. [section number 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:

    - Regulatory restrictions for data transmission,

    - Geographic distance and diversity between networks,

    - 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:

    a. Organization must specify on the application which discrete network(s) the request applies to

    b. Each network will be judged against the existing utilization criteria specified in 6.5.2 as if it were a separate organization, rather than collectively as would be done for requests outside of this policy.

7. Reverse Mapping

7.1. Maintaining IN-ADDRs

All ISPs receiving one or more distinct /16 CIDR blocks of IP addresses from ARIN will be responsible for maintaining all IN-ADDR.ARPA domain records for their respective customers. For blocks smaller than /16, and for the segment of larger blocks smaller than /16, ARIN can maintain IN-ADDRs.

7.2. Lame Delegations in IN-ADDR.ARPA

ARIN will actively identify lame DNS name server(s) for reverse address delegations associated with address blocks allocated, assigned or administered by ARIN. Upon identification of a lame delegation, ARIN shall attempt to contact the POC for that resource and resolve the issue. If, following due diligence, ARIN is unable to resolve the lame delegation, ARIN will update the Whois database records resulting in the removal of lame servers.

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 and Acquisitions

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

- The new entity must provide evidence that they have acquired assets that use the resources to be transferred from the current registrant. ARIN will maintain an up-to-date list of acceptable types of documentation.
- 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.

In the event that number resources of the combined organizations are no longer justified under ARIN policy at the time ARIN becomes aware of the transaction, through a transfer request or otherwise, ARIN will work with the resource holder(s) to return, aggregate, transfer, or reclaim resources as needed to restore compliance via the processes outlined in current ARIN policy.

8.3. Transfers to Specified Recipients

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 will be ineligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.
- 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 M&A transfers.
- The minimum transfer size is a /24

Conditions on recipient of the transfer:

- The recipient must demonstrate the need for up to a 24-month supply of IP address resources under current ARIN policies and sign an RSA.
- The resources transferred will be subject to current ARIN policies.

8.4 Inter-RIR Transfers to Specified Recipients

Inter-regional transfers 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 will not be eligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.
- 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. This restriction does not include M&A transfers.
- The minimum transfer size is a /24.

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 will be subject to current ARIN policies and sign an RSA for the resources being received.
- Recipients within the ARIN region must demonstrate the need for up to a 24-month supply of IPv4 address space.
- The minimum transfer size is a /24

9. [reserved]

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 Size

The Numbering Resources requested come from the global Internet Resource space, and are not from private or other nonroutable Internet Resource space. The allocation size should be consistent with the existing ARIN minimum allocation sizes, unless small allocations are intended to be explicitly part of the experiment. If an organization requires more resource than stipulated by the minimum allocation sizes in force at the time of their request, their experimental documentation should have clearly described and justified why this is required.

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 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