

Draft Policy 2022-12: Direct Assignment Language Update

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Problem Statement

Current Text

29 September
2023

As a result of ARIN's fee harmonization direct assignments are no longer being utilized within ARIN databases, therefore language around that has been deprecated and should be modernized and aligned with current ARIN practices.

Policy Statement

Current Text (29 September 2023)



Section 2.5 - Update definition of Allocation and Assignment to reflect current practice.

FROM:

“Allocation - IP addresses delegated to an organization directly by ARIN for the purpose of subsequent distribution by the recipient organization to other parties.

Assignment - IP addresses delegated to an organization directly by ARIN for the exclusive use of the recipient organization.”

TO:

“Allocation - IP addresses issued directly from ARIN to an organization.

Assignment - Allocation. [Note: The use of assignment as a differentiating term has been deprecated. Assignment should instead be read as Allocation.]

Policy Statement

Current Text (29 September 2023)



Section 2.6 - Change "receiving assignments of" to "issued."

FROM:

"2.6 End User

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

TO:

"2.6 End User

An end-user is an organization issued IP addresses exclusively for use in its operational networks."

Policy Statement

Current Text (29 September 2023)



Section 2.8 - Change “allocated or assigned” to “issued.”

FROM:

“2.8. Registration Services Agreement (RSA)

Number resources allocated or assigned by ARIN under these policies are subject to a contractual agreement between ARIN and the resource holder. Throughout this document, any and all forms of this agreement, past or future, are simply referred to as the Registration Services Agreement (RSA).”

TO:

“2.8. Registration Services Agreement (RSA)

Internet number resources issued by ARIN under these policies are subject to a contractual agreement between ARIN and the resource holder. Throughout this document, any and all forms of this agreement, past or future, are simply referred to as the Registration Services Agreement (RSA).”

Policy Statement

Current Text (29 September 2023)



Section 3.6.3 - Change paragraph 1 text

FROM: "This policy applies to every Organization that has a direct assignment, direct allocation, or AS number from ARIN"

TO: "This policy applies to every Organization that has Internet number resources issued by ARIN"

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

Policy Statement

Current Text (29 September 2023)



Section 4.2.2 - Replace text as follows

FROM: "All ISP organizations without direct assignments or allocations from ARIN qualify for an initial allocation of up to a /22, subject to ARIN's minimum allocation size.

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

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



Section 4.2.2 - Replace text as follows (CONTINUED)

TO: "All ISP organizations without any IPv4 addresses qualify for an initial allocation of a /24. ISPs providing a 24-month utilization plan for the request size specified, may receive up to a /22. ISPs holding re-allocations and/or reassignments must show the efficient utilization of their resources consistent with the requirements in sections 4.2.3 and 4.2.4. "



Section 4.3.2 - Change paragraph 1 text

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

TO: "End-user organizations without an IPv4 allocation qualify for an initial allocation of ARIN's minimum allocation size."

Policy Statement

Current Text (29 September 2023)



Section 6.5.8 - Change section title

FROM: "Direct Assignments from ARIN to End-user Organizations"

TO: "End-user Allocations"



Section 8.5.4 - Change section text

FROM: “Organizations without direct assignments or allocations from ARIN qualify for transfer of an initial IPv4 block of ARIN’s minimum transfer size.”

TO: “Organizations without an IPv4 allocation qualify for transfer of an initial IPv4 allocation of ARIN’s minimum transfer size.”



Section 8.5.6 - Change section text

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

TO: "Organizations with an IPv4 allocation must have efficiently utilized at least 50% of their cumulative IPv4 address blocks in order to receive additional IPv4 addresses. This includes all IPv4 space reassigned to their customers."

History



| Action | Date |
|--------------|-------------------|
| Proposal | 25 July 2022 |
| Draft Policy | 23 August 2022 |
| Revised | 3 November 2022 |
| Revised | 20 March 2023 |
| Revised | 18 July 2023 |
| Revised | 2 August 2023 |
| Revised | 14 August 2023 |
| Revised | 5 September 2023 |
| Revised | 29 September 2023 |

Staff and Legal Review (21 September 2023)



Staff Understanding

This Draft Policy takes steps towards deprecating language around “Assignments” from the NRPM by updating text for clarity and alignment with current ARIN practices. In furtherance of those goals, we recommend terminology and descriptions be consistent and concise to avoid confusion and misinterpretations. Therefore, the following recommendations are made with those purposes in mind:

Staff and Legal Review (21 September 2023)



1. **Section 2.5 Allocation** – Generally, in context “Allocation” is a block of IP addresses throughout the NRPM. So, we recommend defining “Allocation” in that context instead of as a method. In addition, we recommend replacing the phrase “IP address resources” with “IP addresses.”

For example: “IP addresses issued directly from ARIN to an organization.”

2. **Section 2.5 Assignment**– We recommend a minor restructuring that limits the description of Assignment to its new definition, Allocation, followed by a bracketed explanation.

For example: Assignment – Allocation. [Note - The use of Assignment as a differentiating term has been deprecated. Assignment should instead be read as Allocation]

Staff and Legal Review (21 September 2023)



3. **Section 2.8** – “Internet number resources” was recently defined in the NRPM, so we recommend using that term for “number resources.”
4. **Section 4.2.2** – The new section now contains duplicative language, and we recommend a closer look to ensure alignment with current practice. There also appears to be a typo, “initiation” should be “initial.”
5. **Sections 4.3.2, 8.5.4, and 8.5.6** –The phrase “IPv4 resources directly issued by ARIN” can be replaced with “an IPv4 Allocation(s).”
6. **Section 4.3.2** - We recommend replacing all instances of “assignment” with “Allocation.”
7. **Section 8.5.4** – “block” can be “Allocation.”

Staff and Legal Review (21 September 2023)



Implementable as Written? Yes

Impact on ARIN Registry Operations and Services: None

Legal Review : No material legal issue, however legal agrees with staff's comment recommending further clarity.

Staff and Legal Review (21 September 2023)



Implementation Timeframe Estimate: Three months

Implementation Requirements:

- Staff training
- Updates to public documentation

Proposal/Draft Policy Text Assessed: 5 September 2023

Community Feedback



Community feedback overall has been supportive of the need for these changes.

Since ARIN51:

Additional community feedback received resulted in

- Rewording of sections to use "Internet number resources" instead of "allocation or AS number"
- Revisions of sentence structure in several sections for clarity from PPML feedback
- Added revised definitions of "Allocation" and "Assignment" to align with current practice and ensure consistency.

Revisions based on staff and legal feedback

- Updated Allocation and Assignment definitions
- Clarified section 4.2.2 and reworded based on revised understanding of current ARIN practices
- Adjustments for clarity as suggested

Community Feedback



Public Policy Mailing List (PPML) Feedback from 29 September 2023 Revision:

- Feedback that "Allocation" and "Assignment" are well-known terms of art and should not be revised. Suggested to add new definition instead, such as "Direct Issuance" or "Direct Registration"
- Multiple individuals provided feedback supporting not changing definition of "Allocation" or "Assignment."
- Multiparty discussion occurred, including additional clarification of current practices and input from ARIN staff



QUESTION(S) FOR THE COMMUNITY

Are there additional revisions necessary before moving this to recommended draft status?

Thank You



Questions or Comments?