

Discussion Guide

<https://www.arin.net/ARIN40/>



SAN J°SE • 5-6 OCT 2017

WELCOME TO ARIN 40!



Policies in the ARIN region are developed by the Internet community using the open and transparent ARIN Policy Development Process (PDP).

The Internet community develops policies via discussion on the ARIN Public Policy Mailing List (PPML) and at ARIN Public Policy Consultations (PPCs) and ARIN Public Policy and Members Meetings. Anyone may participate in the process – ARIN membership is not required.

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

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

WHAT'S INSIDE

For Discussion

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

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

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

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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 Policy Development Process (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 than three minutes unless the Moderator gives consent.
8. Speakers should direct all remarks to the Moderator. They should not debate with other speakers or otherwise attack or question the motives of other speakers.
9. While the discussion is in progress, speakers may suggest amendments or other secondary proposals to the Moderator, who will see them acted on accordingly.
10. Only the Moderator may call for a poll to gain a sense of the participants regarding the policy under discussion, any part of that policy, any proposed amendment to that policy, or any secondary proposal. The Chair will state all questions before polling the participants and will explain what affirmative and negative responses mean.

Draft Policy Discussion Structure

Policy development is facilitated by the use of a structured process at the Public Policy Consultation and Public Policy Meeting.

The steps in this process are:

1. Introduction:

Recommended Draft Policies are introduced by staff. The history of the draft policy, 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 (AC) members who are shepherds of the draft policy. In addition, ARIN staff and legal assessments are reviewed. Draft Policies and Proposals are works in progress, and as such are not introduced by staff.

2. Presentation:

A member of the AC normally presents the draft policy.

3. Discussion:

Discussion of the draft policy is conducted using the Rules of Discussion.

Draft Policy ARIN-2017-3: Update to NPRM 3.6: Annual Whois POC Validation

https://www.arin.net/policy/proposals/2017_3.html

Advisory Council Shepherds: **Amy Potter, Alyssa Moore**

Latest Version: 06 September 2017

Problem Statement:

The ARIN public access WHOIS directory service is used by the general public and organizations charged with the protection of the public, for a wide variety of purposes, including:

- Assuring the security and reliability of the network by identifying points of contact for IP number resource for network operators, ISPs, and certified computer incident response teams;
- Assisting businesses, consumer groups, medical and healthcare organizations, and other organizations in combating abuse;
- Assisting organizations responsible for the safety of the general public in finding information about potential offenders using IP number resources so that the organizations are able to comply with national, civil and criminal due process laws and to provide justice for victims; and
- Ensuring IP number resource holders worldwide are properly registered, so individuals, consumers and the public are empowered to resolve abusive practices that impact safety and security.

Organizations charged with the protection of the public, including consumer protection, civil safety and law enforcement, utilize the ARIN public access WHOIS directory in their investigations. From a public safety perspective, the failure to have accurate ARIN public access WHOIS information can present the following challenges:

- Ability of public safety and law enforcement agencies to rapidly identify IP number resources used in on-going abusive activities;
- Wasted network operator resources spent on responding to potentially misdirected legal requests; and
- Domain name and IP number resources hijacking, resulting in the potential use of those domain names and IP number resources for criminal activity.

As the amount of criminal activity enabled by the Internet continues to grow globally, users whose IP number resources are abused (for example, by spamming, IP address spoofing, DDOS attacks, etc.) need to be able to obtain redress. For organizations tasked with protecting the general public, one of the most important registration records in the ARIN public access WHOIS directory is that of the last ISP in the chain of network operators providing connectivity. To ensure the accuracy of the WHOIS directory and to facilitate timely/effective response to abusive and criminal activity, the ARIN public access WHOIS directory must be up-to-date and map IP number resources to the correct network provider. Privacy, safety and security are all equally important outcomes, and depend, to a large extent, on the accuracy of the

ARIN public access WHOIS directory.

The problem of potentially inaccurate information is most acute with registrations that were given out prior to the formation of ARIN. These registrations, often termed "legacy" are held by thousands of entities that do not have updated and verified points of contact that are able to be found in the public access WHOIS directory. Many of the original points of contact were removed, and replaced with placeholder records that do not provide any value. This inaccurate information leaves victims and responders without the means of proper redress.

Policy statement:

Current text:

3.6 Annual Whois POC Validation

3.6.1 Method of Annual Verification

During ARIN's 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.

Proposed revised text:

3.6 Annual Validation of ARIN's Public Access WHOIS Point of Contact Data

3.6.1 Annual POC Verification

ARIN will perform an annual verification of point of contact data each year on the date the POC was registered, beginning on January 1 each year using the procedure provided in 3.6.4.

3.6.2 Specified Public WHOIS Points of Contact for Verification

Each of the following Points of Contact are to be verified annually and will be referred to as Points of Contact throughout this policy:

- Admin
- Tech
- NOC
- Abuse

3.6.3 Organizations Covered by this Policy

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

3.6.4 ARIN Staff Procedure for Verification

Email notification will be sent to each of the Points of Contact in section 3.6.2 on an annual basis. Each Point of Contact will have up to sixty (60) days from the date of the notification in which to respond with confirmation as to the public WHOIS contact data or to submit data to correct and complete it. Validation can occur via the ARIN Online account, or, alternatively, by clicking the validation link in the email notification. After the sixty (60) day period, non-responsive Point of Contact records will be marked as "non-responsive" in the public WHOIS directory.

3.6.5 Non-Responsive Point of Contact Records

After an additional ninety (90) days after the Point of Contact record has been marked as "non-responsive", ARIN's staff after through research and analysis, will mark those non validated, abandoned or otherwise illegitimate POC records "invalid". Organizations lacking a valid Tech or Admin POC will lose access to their ARIN Online account until a Tech or Admin POC has been validated.

Comments:

a. Timetable for implementation: to be based upon discussions with ARIN's staff.

b. Anything else

Earlier Version
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Version Date: 21 March 2017

Problem Statement:

The ARIN public access WHOIS directory service is used by the general public and organizations charged with the protection of the public, for a wide variety of purposes, including:

- Assuring the security and reliability of the network by identifying points of contact for IP number resource for network operators, ISPs, and certified computer incident response teams;
- Assisting businesses, consumer groups, medical and health-care organizations, and other organizations in combating abuse;
- Assisting organizations responsible for the safety of the general public in finding information about potential offenders using IP number resources so that the organizations are able to comply with national, civil and criminal due process laws and to provide justice for victims; and
- Ensuring IP number resource holders worldwide are properly registered, so individuals, consumers and the public are empowered to resolve abusive practices that impact safety

and security.

Organizations charged with the protection of the public, including consumer protection, civil safety and law enforcement, utilize the ARIN public access WHOIS directory in their investigations. From a public safety perspective, the failure to have accurate ARIN public access WHOIS information can present the following challenges:

- Ability of public safety and law enforcement agencies to rapidly identify IP number resources used in on-going abusive activities;
- Wasted network operator resources spent on responding to potentially misdirected legal requests; and
- Domain name and IP number resources hijacking, resulting in the potential use of those domain names and IP number resources for criminal activity.

As the amount of criminal activity enabled by the Internet continues to grow globally, users whose IP number resources are abused (for example, by spamming, IP address spoofing, DDOS attacks, etc.) need to be able to obtain redress. For organizations tasked with protecting the general public, one of the most important registration records in the ARIN public access WHOIS directory is that of the last ISP in the chain of network operators providing connectivity. To ensure the accuracy of the WHOIS directory and to facilitate timely/effective response to abusive and criminal activity, the ARIN public access WHOIS directory must be up-to-date and map IP number resources to the correct network provider. Privacy, safety and security are all equally important outcomes, and depend, to a large extent, on the accuracy of the ARIN public access WHOIS directory.

The problem of potentially inaccurate information is most acute with registrations that were given out prior to the formation of ARIN. These registrations, often termed "legacy" are held by thousands of entities that do not have updated and verified points of contact that are able to be found in the public access WHOIS directory. Many of the original points of contact were removed, and replaced with placeholder records that do not provide any value. This inaccurate information leaves victims and responders without the means of proper redress.

Lastly, current ARIN practices do not allow organizations that have been merged or acquired to update their point of contact records without having to enter into a contractual relationship with ARIN. This causes many organizations to not go through the process of updating even their point of contact records.

Policy statement:

Current text:

3.6 Annual Whois POC Validation

3.6.1 Method of Annual Verification

During ARIN's 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.

a. Timetable for implementation: to be based upon discussions with ARIN's staff.

Proposed revised text:

3.6 Annual Validation of ARIN's Public Access WHOIS Point of Contact Data

3.6.1 Annual POC Verification

ARIN will perform an annual verification of point of contact data each year on the date the POC was registered, beginning on January 1 each year using the procedure provided in 3.6.4.

3.6.2 Specified Public WHOIS Points of Contact for Verification

Each of the following Points of Contact are to be verified annually and will be referred to as Points of Contact throughout this policy:

- Admin
- Tech
- NOC
- Abuse

3.6.3 Organizations Covered by this Policy

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

3.6.4 Procedure to Increase Valid Legacy Point of Contact Participation

To encourage Organizations that are deemed to be "legacy" (ones that predated the existence of ARIN and do not have a contractual relationship with ARIN), legacy resource holders shall be able to update the points of contact for the Organization without entering into a contractual relationship with ARIN.

3.6.5 ARIN Staff Procedure for Verification

Email notification will be sent to each of the Points of Contact in section 3.6.2 on an annual basis. Each Point of Contact will have up to sixty (60) days from the date of the notification in which to respond with confirmation as to the public WHOIS contact data or to submit data to correct and complete it. Validation can occur via the ARIN Online account, or, alternatively, by clicking the validation link in the email notification. After the sixty (60) day period, non-responsive Point of Contact records will be marked as "non-responsive" in the public WHOIS directory.

3.6.7 Non-Responsive Point of Contact Records

After an additional ninety (90) days after the Point of Contact record has been marked as "non-responsive", ARIN's staff after through research and analysis, will mark those non validated, abandoned or otherwise illegitimate POC records "invalid". Records marked "invalid" will be taken out of the reverse DNS and their associated resources will be removed from the public WHOIS, thereby disabling reverse DNS. ARIN will make available the necessary resources to ensure enforcement of this policy.

Comments:

Draft Policy ARIN-2017-4: Remove Reciprocity Requirement for Inter-RIR Transfers

https://www.arin.net/policy/proposals/2017_4.html

Advisory Council Shepherds: **Rob Seastrom, Joe Provo**

Latest Version: 06 September 2017

Problem Statement:

AFRINIC and LACNIC are currently considering one-way inter-RIR transfer proposals. Those RIR communities feel a one-way policy that allows network operators in their regions to obtain space from another region and transfer it into AFRINIC and LACNIC may best meet the needs of the operators in that region.

ARIN staff, in reply to an inquiry from AFRINIC, have formally indicated that ARIN's 8.4 policy language will not allow ARIN to participate in such one-way transfers. The staff formally indicate to AFRINIC that the word reciprocal in 8.4 prohibits ARIN from allowing ARIN-registered space to transfer directly to AFRINIC (in this context).

ARIN as a community should recognize that other RIR operator communities have different needs than we do. We should recognize that:

- network operators in AFRINIC in LACNIC have need to obtain space in the market;
- have reasons they think are important to not allow two-way transfers; and
- we should understand that the history of the RIR system has led to LACNIC and AFRINIC having multiple orders of magnitude less IPv4 address space than ARIN does.

Policy statement:

Add the following sentence after the first sentence of NRPM 8.4:

Inter-RIR transfers may take place to an RIR with a non-reciprocal inter-RIR transfer policy only when the recipient RIR has an IPv4 total inventory less than the average (mean) of the IPv4 total inventory among all of the RIRs.

Timetable for implementation: Upon the ratification of any inter-RIR transfer policy at another RIR that is one-way as described in the problem statement.

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ARIN STAFF & LEGAL ASSESSMENT

Draft Policy ARIN-2017-04

Remove Reciprocity Requirements for Inter-RIR Transfers

https://arin.net/policy/proposals/2017_4.html

Date of Assessment: 7 September 2017

1. Summary (Staff Understanding)

Draft Policy 2017-04 will allow ARIN to approve inter-regional source transfers to any RIR whose IPv4 address space inventory is below that of the global average of all RIR IPv4 address inventories when that RIR has an inter-regional transfer policy which is not bidirectional in nature. A snapshot of the current existing

“total” RIR IPv4 inventories computed based on the extended stats file are:

ARIN has 1,686,159,104 billion IPv4 addresses in its inventory.

APNIC has 881,734,912 million IPv4 addresses in its inventory.

RIPE has 822,316,800 million IPv4 addresses in its inventory.

LACNIC has 190,775,552 million IPv4 addresses in its inventory.

AFRINIC has 121,242,624 million IPv4 addresses in its inventory.

Global average: 740,445,798 million IPv4 addresses.

Based on the computations above Draft Policy 2017-04 will specifically allow ARIN to approve source transfers out to both LACNIC and AFRINIC even if they do not have a bidirectional inter-RIR transfer policy that would allow for IPv4 addresses to be transferred in to ARIN. Each RIR would need to have an actual “transfer policy” in place in order to be considered under this policy. Further, it is staff’s understanding that this policy does not change the requirement for a compatible, needs-based Inter-RIR transfer policy.

2. Comments

A. ARIN Staff Comments

* Consider changing “Remove” in the title to a more appropriate verb such as modify, particularly since the requirement remains in place under some circumstances.

* Quarterly, ARIN will compute the average of the total inventory and assess each RIR’s total inventory against that average. The resulting assessment will be posted online.

* This policy would be implemented to work only with RIRs that have a unidirectional, compatible, needs-based Inter-RIR transfer policy in place and meet the address pool criteria of this policy.

* To eliminate any possible confusion of the meaning of ‘reciprocity’ it is recommended that ‘with a non-reciprocal Inter-RIR transfer policy’ would be better phrased as ‘with a unidirectional, compatible, needs-based Inter-RIR transfer policy.’

* A corollary recommendation is to change section 8.4 of the NRPM so that the word “reciprocal” is changed to “bidirectional” in the first sentence. Similarly, the word “reciprocal” in the title of the draft policy could be changed to “bidirectional”.

* This proposed policy may be more complex than necessary, since there is a modest number of transfers of number resources coming into the ARIN region via NRPM 8.4, which suggests a very small potential impact if the policy change were to remove the bidirectional policy requirement in its entirety.

* This policy could be implemented as written with the recommended changes.

B. ARIN General Counsel – Legal Assessment

* The staff’s interpretation spelled out above, that removing “recip-

rocal” does not remove “compatible” and “needs based” is a legally critical aspect of how this policy would be implemented. Absent such an understanding counsel would recommend against an unlimited transfer policy.

3. Resource Impact

Implementation of this policy would have minimal resource impact. 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
- * Minimal engineering work

4. Proposal / Draft Policy Text Assessed

Draft Policy ARIN-2017-4: Remove Reciprocity Requirement for Inter-RIR Transfers

Version Date: 6 September 2017

Problem Statement:

AFRINIC and LACNIC are currently considering one-way inter-RIR transfer proposals. Those RIR communities feel a one-way policy a policy that allows network operators in their regions to obtain space from another region and transfer it into AFRINIC and LACNIC may best meet the needs of the operators in that region.

ARIN staff, in reply to an inquiry from AFRINIC, have formally indicated that ARINs 8.4 policy language will not allow ARIN to participate in such one-way transfers. The staff formally indicate to AFRINIC that the word reciprocal in 8.4 prohibits ARIN from allowing ARIN-registered space to transfer directly to AFRINIC (in this context).

ARIN as a community should recognize that other RIR operator communities have different needs than we do.

We should recognize that:

- network operators in AFRINIC in LACNIC have need to obtain space in the market;
- have reasons they think are important to not allow two-way transfers; and
- we should understand that the history of the RIR system has led to LACNIC and AFRINIC having multiple orders of magnitude less IPv4 address space than ARIN does.

Policy statement:

Add the following sentence after the first sentence of NRPM 8.4:

Inter-RIR transfers may take place to an RIR with a non-reciprocal inter-RIR transfer policy only when the recipient RIR has an IPv4 total inventory less than the average (mean) of the IPv4 total inventory among all of the RIRs.

Timetable for implementation: Upon the ratification of any inter-RIR transfer policy at another RIR that is one-way as described in the problem statement.

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Earlier Version

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Version Date: 10 April 2017

Problem Statement:

AFRINIC and LACNIC are currently considering one-way inter-RIR transfer proposals. Those RIR communities feel a one-way policy a policy that allows network operators in their regions to obtain space from another region and transfer it into AFRINIC and LACNIC may best meet the needs of the operators in that region.

ARIN staff, in reply to an inquiry from AFRINIC, have formally indicated that ARINs 8.4 policy language will not allow ARIN to participate in such one-way transfers. The staff formally indicate to AFRINIC that the word reciprocal in 8.4 prohibits ARIN from allowing ARIN-registered space to transfer directly to AFRINIC (in this context).

ARIN as a community should recognize that other RIR operator communities have different needs than we do. We should recognize that:

- network operators in AFRINIC in LACNIC have need to obtain space in the market;
- have reasons they think are important to not allow two-way transfers; and
- we should understand that the history of the RIR system has led to LACNIC and AFRINIC having multiple orders of magnitude less IPv4 address space than ARIN does.

Policy statement:

Add the following sentence after the first sentence of NRPM 8.4:

Inter-regional transfers may take place to an RIR without a reciprocal inter-regional transfer policy only when the recipient RIR has less IPv4 address space in its inventory than the global average of RIR IPv4 address inventories.

Timetable for implementation: Upon the ratification of any inter-RIR transfer policy at another RIR that is one-way as described in the problem statement.

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ARIN STAFF & LEGAL ASSESSMENT

Draft Policy ARIN-2017-04

Remove Reciprocity Requirements for Inter-RIR Transfers

https://arin.net/policy/proposals/2017_4.html

Date of Assessment: 22 May 2017

1. Summary (Staff Understanding)

Draft Policy 2017-04 will allow ARIN to approve inter-regional source transfers to any RIR whose IPv4 address space inventory is below that of the global average of all RIR IPv4 address inventories without that RIR having a reciprocal inter-regional transfer policy. A snapshot of the current existing “total” RIR IPv4 inventories computed based on the extended stats file are:

ARIN has 1.687 billion IPv4 addresses in its inventory.

APNIC has 881 million IPv4 addresses in its inventory.

RIPE has 822 million IPv4 addresses in its inventory.

LACNIC has 191 million IPv4 addresses in its inventory.

AFRINIC has 121 million IPv4 addresses in its inventory.

Global average: 740 million IPv4 addresses.

Based on the computations above Draft Policy 2017-04 will specifically allow ARIN to approve source transfers out to both LACNIC and AFRINIC even if they do not have a reciprocal inter-RIR transfer policy that would allow for IPv4 addresses to be transferred in to ARIN. Each RIR would need to have an actual "transfer policy" in place in order to be considered under this policy.

If the intent is that the ability to transfer is based on "available" inventory then the outcome would be as below:

AFRINIC has 16.9 million IPv4 addresses available/reserved.

RIPE has 13.0 million IPv4 addresses available/reserved.

APNIC has 10.6 million IPv4 addresses available/reserved.

ARIN has 6.2 million IPv4 addresses available/reserved.

LACNIC has 4.7 million IPv4 addresses available/reserved.

Global average: 10.3 million IPv4 addresses available/reserved.

Based on the computations above Draft Policy 2017-04 will specifically allow ARIN to approve source transfers out to only LACNIC even if they do not have a reciprocal inter-RIR transfer policy that would allow for IPv4 addresses to be transferred in to ARIN. They would need to have an actual "transfer policy" in place in order to be considered under this policy.

2. Comments

A. ARIN Staff Comments

* Recommend that the term "total inventory" be used if the intent is to count all of the RIR's IPv4 holdings (assigned, allocated, available and reserved) toward eligibility of this policy or "available inventory" if that is the intent of this policy.

* Consider changing "Remove" in the title to a more appropriate verb such as modify.

* ARIN will compute the average of either "total" or "available" inventory monthly and post it online in order to ensure compliance with the policy.

* This policy would be implemented to work only with RIRs that have a non-reciprocal Inter-RIR transfer policy in place and meet the address pool criteria of this policy. While the intent is to permit the possibility of transfers from the ARIN region to LACNIC and AFRINIC region, nothing would preclude other RIRs from changing their existing reciprocal transfer policies should their "total" or "available" inventories fall below the average of the five RIRs. NOTE: If using "available" inventory then only LACNIC would qualify today while using "total" inventory AFRINIC and LACNIC would both qualify.

* Using "total" inventory adds stability to the policy as the "total" inventories will not change very often while the "available" inventory will change almost daily.

* The phrase 'without a reciprocal inter-regional transfer policy' would be better phrased as 'with a non-reciprocal Inter-RIR transfer policy'.

* This policy could be implemented as written once the intent of the policy with regard to address pool is clarified.

B. ARIN General Counsel – Legal Assessment

* Counsel sees no material legal issues in this policy.

3. Resource Impact

Implementation of this policy would have minimal resource impact. 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
- * Minimal engineering work

4. Proposal / Draft Policy Text Assessed

Draft Policy 2017-04: Remove Reciprocity Requirements for Inter-RIR Transfers

Problem Statement:

AFRINIC and LACNIC are currently considering one-way inter-RIR transfer proposals. Those RIR communities feel a one-way policy a policy that allows network operators in their regions to obtain space from another region and transfer it into AFRINIC and LACNIC may best meet the needs of the operators in that region.

ARIN staff, in reply to an inquiry from AFRINIC, have formally indicated that ARINs 8.4 policy language will not allow ARIN to participate in such one-way transfers. The staff formally indicate to AFRINIC that the word reciprocal in 8.4 prohibits ARIN from allowing ARIN-registered space to transfer directly to AFRINIC (in this context).

ARIN as a community should recognize that other RIR operator communities have different needs than we do.

We should recognize that:

- network operators in AFRINIC in LACNIC have need to obtain space in the market;
- have reasons they think are important to not allow two-way transfers; and
- we should understand that the history of the RIR system has led to LACNIC and AFRINIC having multiple orders of magnitude less IPv4 address space than ARIN does.

Policy statement:

Add the following sentence after the first sentence of NRPM 8.4:

Inter-regional transfers may take place to an RIR without a reciprocal inter-regional transfer policy only when the recipient RIR has less IPv4 address space in its inventory than the global average of RIR IPv4 address inventories.

Timetable for implementation: Upon the ratification of any inter-RIR transfer policy at another RIR that is one-way as described in the problem statement.

Recommended Draft Policy ARIN-2017-5: Improved IPv6 Registration Requirements

https://www.arin.net/policy/proposals/2017_5.html

Advisory Council Shepherds: **Leif Sawyer, Chris Tacit**

Latest Version: 18 September 2017

AC's Statement of Conformance with ARIN's Principles of Internet Number Resource Policy:

This proposal is technically sound and enables fair and impartial number policy for easier IPv6 Registrations. The staff and legal review noted a single clarification issue which has been addressed. There is ample support for the proposal on PPML and no concerns have been raised by the community regarding the proposal.

Problem Statement:

Current ARIN policy has different WHOIS directory registration requirements for IPv4 vs IPv6 address assignments. IPv4 registration is triggered for an assignment of any address block equal to or greater than a /29 (i.e., eight IPv4 addresses). In the case of IPv6, registration occurs for an assignment of any block equal to or greater than a /64, which constitutes one entire IPv6 subnet and is the minimum block size for an allocation. Accordingly, there is a significant disparity between IPv4 and IPv6 WHOIS registration thresholds in the case of assignments, resulting in more work in the case of IPv6 than is the case for IPv4. There is no technical or policy rationale for the disparity, which could serve as a deterrent to more rapid IPv6 adoption. The purpose of this proposal is to eliminate the disparity and corresponding adverse consequences.

Policy statement:

1) Alter section 6.5.5.1 "Reassignment information" of the NRPM to strike "assignment containing a /64 or more addresses" and change to "re-allocation, reassignment containing a /47 or more addresses, or subdelegation of any size that will be individually announced,"

and

2) Alter section 6.5.5.2. "Assignments visible within 7 days" of the NRPM to strike the text "4.2.3.7.1" and change to "6.5.5.1"

and

3) Alter section 6.5.5.3.1. "Residential Customer Privacy" of the NRPM by deleting the phrase "holding /64 and larger blocks"

and

4) Add new section 6.5.5.4 "Registration Requested by Recipient" of the NRPM, to read: "If the downstream recipient of a static assignment of /64 or more addresses requests publishing of that assignment in ARIN's registration database, the ISP should register that assignment as described in section 6.5.5.1."

Comments:

a. Timetable for implementation:

Policy should be adopted as soon as possible.

b. Anything else:

Author Comments:

IPv6 should not be more burdensome than the equivalent IPv4 network size. Currently, assignments of /29 or more of IPv4 space (8 addresses) require registration. The greatest majority of ISP customers who have assignments of IPv4 space are of a single IPv4 address which do not trigger any ARIN registration requirement when using IPv4. This is NOT true when these same exact customers use IPv6, as assignments of /64 or more of IPv6 space require registration. Beginning with RFC 3177, it has been standard practice to assign a minimum assignment of /64 to every customer end user site, and less is never used. This means that ALL IPv6 assignments, including those customers that only use a single IPv4 address must be registered with ARIN if they are given the minimum assignment of /64 of IPv6 space. This additional effort may prevent ISP's from giving IPv6 addresses because of the additional expense of registering those addresses with ARIN, which is not required for IPv4. The administrative burden of 100% customer registration of IPv6 customers is unreasonable, when such is not required for those customers receiving only IPv4 connections.

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Earlier Version

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Version Date: 22 August 2017

Problem Statement:

Current ARIN policy has different WHOIS directory registration requirements for IPv4 vs IPv6 address assignments. IPv4 registration is triggered for an assignment of any address block equal to or greater than a /29 (i.e., eight IPv4 addresses). In the case of IPv6, registration occurs for an assignment of any block equal to or greater than a /64, which constitutes one entire IPv6 subnet and is the minimum block size for an allocation. Accordingly, there is a significant disparity between IPv4 and IPv6 WHOIS registration thresholds in the case of assignments, resulting in more work in the case of IPv6 than is the case for IPv4. There is no technical or policy rationale for the disparity, which could serve as a deterrent to more rapid IPv6 adoption. The purpose of this proposal is to eliminate the disparity and corresponding adverse consequences.

Policy statement:

1) Alter section 6.5.5.1 "Reassignment information" of the NRPM to strike "/64 or more addresses" and change to "/47 or more addresses, or subdelegation of any size that will be individually announced,"

and

2) Alter section 6.5.5.2. "Assignments visible within 7 days" of the NRPM to strike the text "4.2.3.7.1" and change to "6.5.5.1"

and

3) Alter section 6.5.5.3.1. "Residential Customer Privacy" of the NRPM by deleting the phrase "holding /64 and larger blocks"

and

4) Add new section 6.5.5.4 "Registration Requested by Recipient" of the NRPM, to read: "If the downstream recipient of a static assignment of /64 or more addresses requests publishing of that assignment in ARIN's registration database, the ISP must register that assignment as described in section 6.5.5.1."

Comments:

a. Timetable for implementation: Policy should be adopted as soon as possible.

b. Anything else:

Author Comments: IPv6 should not be more burdensome than the equivalent IPv4 network size. Currently, assignments of /29 or more of IPv4 space (8 addresses) require registration. The greatest majority of ISP customers who have assignments of IPv4 space are of a single IPv4 address which do not trigger any ARIN registration requirement when using IPv4. This is NOT true when these same exact customers use IPv6, as assignments of /64 or more of IPv6 space require registration. Beginning with RFC 3177, it has been standard practice to assign a minimum assignment of /64 to every customer end user site, and less is never used. This means that ALL IPv6 assignments, including those customers that only use a single IPv4 address must be registered with ARIN if they are given the minimum assignment of /64 of IPv6 space. This additional effort may prevent ISP's from giving IPv6 addresses because of the additional expense of registering those addresses with ARIN, which is not required for IPv4. The administrative burden of 100% customer registration of IPv6 customers is unreasonable, when such is not required for those customers receiving only IPv4 connections.

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ARIN STAFF & LEGAL ASSESSMENT

Draft Policy ARIN-2017-05

Improved IPv6 Registration Requirements

https://www.arin.net/policy/proposals/2017_5.html

Date of Assessment: 30 August 2017

1. Summary (Staff Understanding)

Draft Policy 2017-05 will change the requirement for IPv6 registration from /64 or more addresses to a /47 or more addresses, or sub-delegation of any size that will be individually announced. It corrects the pointer in 6.5.5.2 to point to 6.5.5.1 instead of 4.2.3.7.1 and adds a new requirement stating that a downstream

recipient of a /64 or more addresses may request the publishing of their reassignment information by their upstream provider. The upstream provider must publish the information upon request of their customer.

2. Comments

A. ARIN Staff Comments:

* The change from a "/64 or more addresses" to a "/47 or more addresses, or sub-delegation of any size," is a straightforward change that could be implemented immediately as written.

* The change to the pointer is an easy fix to the NRPM

* If the wording in 6.5.5.4 is meant as a requirement for the ISP to register the reassignment as requested by the downstream then this may be out of scope for the NRPM as ARIN has no way to enforce it. Suggest changing the "...must publish..." to "...should publish..." or other wording that would indicate it is a desirable action on the part of the ISP. If it is meant only that if the ISP agrees to register it, that it must register it in accordance with the guidelines in 6.5.5.1 then it could be implemented if the wording is clarified. As written it is unclear what the intent is.

B. ARIN General Counsel – Legal Assessment

* There are no material legal issues regarding this proposal.

3. Resource Impact

Implementation of this policy would have minimal resource impact. 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-2017-5: Improved IPv6 Registration Requirements

Version Date: 22 August 2017

Problem Statement:

Current ARIN policy has different WHOIS directory registration requirements for IPv4 vs IPv6 address assignments. IPv4 registration is triggered for an assignment of any address block equal to or greater than a /29 (i.e., eight IPv4 addresses). In the case of IPv6, registration occurs for an assignment of any block equal to or greater than a /64, which constitutes one entire IPv6 subnet and is the minimum block size for an allocation. Accordingly, there is a significant disparity between IPv4 and IPv6 WHOIS registration thresholds in the case of assignments, resulting in more work in the case of IPv6 than is the case for IPv4. There is no technical or policy rationale for the disparity, which could serve as a deterrent to more rapid IPv6 adoption. The purpose of this proposal is to eliminate the disparity and corresponding adverse consequences.

Policy statement:

1) Alter section 6.5.5.1 "Reassignment information" of the NRPM to strike "/64 or more addresses" and change to "/47 or more addresses, or subdelegation of any size that will be individually announced,"

and

2) Alter section 6.5.5.2. "Assignments visible within 7 days" of the NRPM to strike the text "4.2.3.7.1" and change to "6.5.5.1"

and

3) Alter section 6.5.5.3.1. "Residential Customer Privacy" of the NRPM by deleting the phrase "holding /64 and larger blocks"

and

4) Add new section 6.5.5.4 "Registration Requested by Recipient" of the NRPM, to read: "If the downstream recipient of a static assignment of /64 or more addresses requests publishing of that assignment in ARIN's registration database, the ISP must register that assignment as described in section 6.5.5.1."

Comments:

a. Timetable for implementation: Policy should be adopted as soon as possible.

b. Anything else:

Author Comments: IPv6 should not be more burdensome than the equivalent IPv4 network size. Currently, assignments of /29 or more of IPv4 space (8 addresses) require registration. The greatest majority of ISP customers who have assignments of IPv4 space are of a single IPv4 address which do not trigger any ARIN registration requirement when using IPv4. This is NOT true when these same exact customers use IPv6, as assignments of /64 or more of IPv6 space require registration. Beginning with RFC 3177, it has been standard practice to assign a minimum assignment of /64 to every customer end user site, and less is never used. This means that ALL IPv6 assignments, including those customers that only use a single IPv4 address must be registered with ARIN if they are given the minimum assignment of /64 of IPv6 space. This additional effort may prevent ISP's from giving IPv6 addresses because of the additional expense of registering those addresses with ARIN, which is not required for IPv4. The administrative burden of 100% customer registration of IPv6 customers is unreasonable, when such is not required for those customers receiving only IPv4 connections.

END

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Earlier Version

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Version Date: 15 August 2017

Problem Statement:

Current ARIN policy has different WHOIS directory registration requirements for IPv4 vs IPv6 address assignments. IPv4 registration is triggered for an assignment of any address block equal to or greater than a /29 (i.e., eight IPv4 addresses). In the case of IPv6, registration occurs for an assignment of any block equal to or greater than a /64, which constitutes one entire IPv6 subnet and is the minimum block size for an allocation. Accordingly, there is a significant disparity between IPv4 and IPv6 WHOIS registration thresholds in the case of assignments, resulting in more work in the case of IPv6 than is the case for IPv4. There is no technical or policy rationale for the disparity, which could serve as a deterrent to more rapid IPv6 adoption. The purpose of this proposal is to eliminate the disparity and corresponding adverse consequences.

Policy statement:

1) Alter section 6.5.5.1 "Reassignment information" of the NRPM to strike "/64 or more addresses" and change to "/47 or more addresses, or subdelegation of any size that will be individually announced,"

and

2) Alter section 6.5.5.3.1. "Residential Customer Privacy" of the NRPM by deleting the phrase "holding /64 and larger blocks"

and

3) Add new section 6.5.5.4 "Downstream Registration Requests" to the NRPM that reads "If the downstream recipient of a netblock (a /64 or more addresses) requests publishing in ARIN's registration database, the ISP must register the netblock, regardless of size."

Comments:

a. Timetable for implementation: Policy should be adopted as soon as possible.

b. Anything else:

Author Comments: IPv6 should not be more burdensome than the equivalent IPv4 network size. Currently, assignments of /29 or more of IPv4 space (8 addresses) require registration. The greatest majority of ISP customers who have assignments of IPv4 space are of a single IPv4 address which do not trigger any ARIN registration requirement when using IPv4. This is NOT true when these same exact customers use IPv6, as assignments of /64 or more of IPv6 space require registration. Beginning with RFC 3177, it has been standard practice to assign a minimum assignment of /64 to every customer end user site, and less is never used. This means that ALL IPv6 assignments, including those customers that only use a single IPv4 address must be registered with ARIN if they are given the minimum assignment of /64 of IPv6 space. This additional effort may prevent ISP's from giving IPv6 addresses because of the additional expense of registering those addresses with ARIN, which is not required for IPv4. The administrative burden of 100% customer registration of IPv6 customers is unreasonable, when such is not required for those customers receiving only IPv4 connections.

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Earlier Version

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Version Date: 21 July 2017

Problem Statement:

Current ARIN policy has different WHOIS directory registration requirements for IPv4 vs IPv6 address assignments. IPv4 registration is triggered for an assignment of any address block equal to or greater than a /29 (i.e., eight IPv4 addresses). In the case of IPv6, registration occurs for an assignment of any block equal to or greater than a /64, which constitutes one entire IPv6 subnet and is the minimum block size for an allocation. Accordingly, there is a significant disparity between IPv4 and IPv6 WHOIS registration thresholds in the case of assignments, resulting in more work in the case of IPv6 than is the case for IPv4. There is no technical or

policy rationale for the disparity, which could serve as a deterrent to more rapid IPv6 adoption. The purpose of this proposal is to eliminate the disparity and corresponding adverse consequences.

Policy statement:

1) Alter section 6.5.5.1 "Reassignment information" of the NRPM to strike "/64 or more addresses" and change to "/47 or more addresses, or sub-delegation of any size that will be individually announced,"

and

2) Alter section 6.5.5.3.1. "Residential Customer Privacy" of the NRPM by deleting the phrase "holding /64 and larger blocks"

Comments:

a. Timetable for implementation: Policy should be adopted as soon as possible.

b. Anything else:

Author Comments: IPv6 should not be more burdensome than the equivalent IPv4 network size. Currently, assignments of /29 or more of IPv4 space (8 addresses) require registration. The greatest majority of ISP customers who have assignments of IPv4 space are of a single IPv4 address which do not trigger any ARIN registration requirement when using IPv4. This is NOT true when these same exact customers use IPv6, as assignments of /64 or more of IPv6 space require registration. Beginning with RFC 3177, it has been standard practice to assign a minimum assignment of /64 to every customer end user site, and less is never used. This means that ALL IPv6 assignments, including those customers that only use a single IPv4 address must be registered with ARIN if they are given the minimum assignment of /64 of IPv6 space. This additional effort may prevent ISP's from giving IPv6 addresses because of the additional expense of registering those addresses with ARIN, which is not required for IPv4. The administrative burden of 100% customer registration of IPv6 customers is unreasonable, when such is not required for those customers receiving only IPv4 connections.

Earlier Version
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Version Date: 7 June 2017

Problem Statement:

Currently, assignments of /29 or more of IPv4 space (8 addresses) require registration. The greatest majority of ISP customers who have assignments of IPv4 space are of a single IPv4 address or less (CGnat), which do not trigger any ARIN registration requirement when using IPv4. This is NOT true when these same exact customers use IPv6.

Currently, assignments of /64 or more of IPv6 space require registration. Beginning with RFC 3177, it has been standard practice to assign a minimum assignment of /64 to every customer end user site, and less is never used. This means that ALL IPv6 assignments, including those customers that only use a single IPv4 address must be registered with ARIN if they are given the minimum

assignment of /64 of IPv6 space. This additional effort may prevent ISP's from giving IPv6 addresses because of the additional expense of registering those addresses with ARIN, which is not required for IPv4.

IPv6 assignments are therefore treated stricter than IPv4 assignments. Policy should either treat both protocols the same, or provide incentive for the IPv6 future. A typical ISP serving residential and small business customers with both IPv4 and IPv6 would typically provide the following assignments to each customer site: /32 (one IP) of IPv4 and a /64 (one network) of IPv6. Under the current policy, that small network customer is exempt from registration for their IPv4 assignment, but the ISP would be required to register ALL IPv6 customers, even those of this smallest network size.

In actual fact, most ISP's that are providing their customers with a /64 or more of IPv6 space are not in fact registering this fact with ARIN, even though 6.5.5.1 clearly requires this.

It is my belief that these residential and small business customers should not require registration if they did not require registration for the same size IPv4 network, including routers with Vlan and other security support. and thus I propose to make the standard for registration only those customers that have more than 16 IPv6 /64 networks. This would treat IPv6 slightly better than IPv4, and provide additional encouragement for adoption.

Policy statement:

Amend 6.5.5.1 of the policy manual to strike "/64 or more" and change to "more than a /60".

Comments:

a. Timetable for implementation:

Policy should be adopted as soon as possible, as the new administrative burden of 100% customer registration of IPv6 customers is unreasonable, when such is not required for those customers receiving only IPv4 connections. IPv6 should not be more burdensome than the equivalent IPv4 network size.

b. Anything else:

The specific sizes chosen set the point of registration for each site to more than 16 networks or addresses, so that those with 16 or less IPv6 networks (/60) have no registration requirement. This change will result in both protocols being treated exactly the same, and removes residential and small business accounts from any registration requirement with ARIN, and the burden that will create for all ISP's.

There are those that might argue that a residential customer will never have a need for more than a /64 of IPv6. Clearly this is false in an IOT and/or wireless world, as many routers already provide a separate address range for wired vs wireless to prevent wired hacking via the wireless space, and also may provide a guest wireless SSID apart from the one provided to the regular users of that same network. Such separation in the IPv4 world is currently done in RFC1918 space using NAT. In IPv6, the equivalent must be done with different /64 blocks. Since good security practices require use at least 2 /64 blocks for wireless and/or IOT isolation, this would require a minimum of a /60 of IPv6 space or up to 16 networks or vlans, an amount that is consistent with a residential or small

business network. This type network does not trigger registration under the current IPv4 policy, and its equal should not trigger registration with ARIN based on the current IPv6 policy as is currently the case, and thus, this policy needs to be changed.

Earlier Version
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Version Date: 20 April 2017

Problem Statement:

Currently, assignments of /29 or more of IPv4 space (8 addresses) require registration. The greatest majority of ISP customers who have assignments of IPv4 space are of a single IPv4 address or less (CGnat), which do not trigger any ARIN registration requirement when using IPv4. This is NOT true when these same exact customers use IPv6.

Currently, assignments of /64 or more of IPv6 space require registration. Beginning with RFC 3177, it has been standard practice to assign a minimum assignment of /64 to every customer end user site, and less is never used. This means that ALL IPv6 assignments, including those customers that only use a single IPv4 address must be registered with ARIN if they are given the minimum assignment of /64 of IPv6 space. This additional effort may prevent ISP's from giving IPv6 addresses because of the additional expense of registering those addresses with ARIN, which is not required for IPv4.

IPv6 assignments are therefore treated stricter than IPv4 assignments. The policy should treat both protocols the same. A typical ISP serving residential and small business customers with both IPv4 and IPv6 would typically provide the following assignments to each customer site: /32 (one IP) of IPv4 and a /64 (one network) of IPv6. Under the current policy, that small network customer is exempt from registration for their IPv4 assignment, but the ISP would be required to register ALL IPv6 customers, even those of this smallest network size.

In actual fact, most ISP's that are providing their customers with a /64 or more of IPv6 space are not in fact registering this fact with ARIN, even though 6.5.5.1 clearly requires this.

It is my belief that these residential and small business customers should not require registration if they did not require registration for the same size IPv4 network, including routers with Vlan and other security support. and thus I propose to make the standard for registration only those customers that have more than 16 IPv4 addresses or 16 IPv6 /64 networks. This would treat IPv6 the same as IPv4.

Policy statement:

Amend 4.2.3.7.1 of the policy manual to strike "/29 or more" and change to "more than a /28".

Amend 6.5.5.1 of the policy manual to strike "/64 or more" and change to "more than a /60".

Comments:

a. Timetable for implementation:

Policy should be adopted as soon as possible, as the new administrative burden of 100% customer registration of IPv6 customers is unreasonable, when such is not required for those customers receiving only IPv4 connections. IPv6 should not be more burdensome than the equivalent IPv4 network size.

b. Anything else:

The specific sizes chosen set the point of registration for each site to more than 16 networks or addresses, so that those with 16 or less networks (IPv6 /60) or addresses (IPv4 /28) have no registration requirement. This change will result in both protocols being treated exactly the same, and removes residential and small business accounts from any registration requirement with ARIN, and the burden that will create for all ISP's.

There are those that might argue that a residential customer will never have a need for more than a /64 of IPv6. Clearly this is false in an IOT and/or wireless world, as many routers already provide a separate address range for wired vs wireless to prevent wired hacking via the wireless space, and also may provide a guest wireless SSID apart from the one provided to the regular users of that same network. Such separation in the IPv4 world is currently done in RFC1918 space using NAT. In IPv6, the equivalent must be done with different /64 blocks. Since good security practices require use at least 2 /64 blocks for wireless and/or IOT isolation, this would require a minimum of a /60 of IPv6 space or up to 16 networks or vlans, an amount that is consistent with a residential or small business network. This type network does not trigger registration under the current IPv4 policy, and its equal should not trigger registration with ARIN based on the current IPv6 policy as is currently the case, and thus, this policy needs to be changed.

Draft Policy ARIN-2017-6: Improve Reciprocity Requirement for Inter-RIR Transfers

https://www.arin.net/policy/proposals/2017_6.html

Advisory Council Shepherds: **Alison Wood, David Huberman**

Latest Version: 20 June 2017

Version Date: 20 June 2017

Problem Statement:

Currently ARIN's requirement that inter-RIR transfer policies be reciprocal has a glaring hole in it in that RIRs which have NIRs and/or a two-hop RIR transfer process can be used to circumvent the intent of the requirement. Rather than eliminate the requirement, a better approach would be to close the loophole.

Policy statement:

Amend section 8.4 (included here for reference):

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 must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN for the 12 months prior to the approval of a transfer request, unless either the source or recipient entity owns or controls the other, or both are under common ownership or control. This restriction does not include M&A transfers.

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

Conditions on recipient of the transfer:

The conditions on a recipient outside of the ARIN region will be defined by the policies of the receiving RIR.

Recipients within the ARIN region must meet the transfer requirements as defined in section 8.5.

Recipients within the ARIN region will be subject to current ARIN policies.

Make the following change:

Add an additional bullet to "Conditions on recipient" which states:

+ Recipient RIR policy must not permit transfers to other RIRs or NIRs whose policies do not support bi-directional transfers.

Comments:

a. Timetable for implementation: Immediate

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ARIN STAFF & LEGAL ASSESSMENT

Draft Policy ARIN-2017-6

Improve Reciprocity Requirement for Inter-RIR Transfers

https://www.arin.net/policy/proposals/2017_6.html

Date of Assessment: 31 August 2017

1. Summary (Staff Understanding)

Draft Policy ARIN-2017-6 would not allow ARIN to transfer address space to RIRs that could then transfer that space to an RIR or NIR whose policies do not support bi-directional transfers.

For clarity if this policy (2017-06) is implemented, there would be 3 distinct criteria that will need to be met by other RIRs to enable transfers from ARIN:

1. The RIR must allow bi-directional Inter-RIR transfers. (Already in ARIN NRPM)
2. The RIR must have needs-based assessments for Inter-RIR transfer recipients. (Already in NRPM)
3. The RIR must have an active policy that prevents them from conducting transfers with other RIRs/NIRs that do not themselves have a bi-directional policy that allows for Inter-RIR transfers. (Would be added to NRPM if 2017-06 was ratified/adopted)

2. Comments

A. ARIN Staff Comments

This Draft Policy could be implemented as written.

* Currently ARIN allows Inter-RIR transfers to APNIC, and RIPE NCC. Neither of these RIRs have policies in place that would prohibit them from transferring address space to RIRs or NIRs without bi-directional transfer policies. As such, ARIN would no longer allow Inter-RIR transfers to these RIRs.

* Currently ARIN does not allow Inter-RIR transfers to LACNIC and AFRINIC because, as stated in NRPM Section 8.4, "Inter-regional transfers may take place only via RIRs who agree to the transfer and share reciprocal, compatible, needs-based policies." This Draft Policy would have no impact on ARIN's stance with either LACNIC or AFRINIC.

* Staff reserves the right to and may proactively seek interpretation of this policy's impacts by other RIRs.

* Draft Policy ARIN-2017-4: Remove Reciprocity Requirement for Inter-RIR Transfers is also under discussion, and would remove the aforementioned reciprocity requirement. These two policies are in

direct conflict and could not both be adopted.

B. ARIN General Counsel – Legal Assessment

* When ARIN adopted an inter-RIR transfer policy in 20XX that was dependent upon the other region reciprocally permitting transfers to the ARIN region, that ARIN policy did not seek to limit the resulting recipient RIR from subsequently permitting a transfer of the same resources from the second RIR's region to a third RIR, whose policy do not qualify for an ARIN transfer. Two RIR's have subsequently chosen to adopt corresponding inter RIR reciprocity standards in their policies (APNIC and RIPE).

2017-06, if adopted, would require both APNIC and RIPE to amend their now existing reciprocal transfer policies due to ARIN's newly revised requirement if inter region transfers were to again be permitted from the ARIN region. Those other RIRs might choose not to amend their policies. In the interim, and perhaps forever, no transfers out of the ARIN region would be permitted if 2017-6 is approved.

In the debate on this policy, have not seen any reference to a single documented instance of number resources transferred from ARIN to APNIC or RIPE, where the identical resources have subsequently been transferred to AFRINIC or LACNIC. Lawyers call this a 'corner case' that while theoretically could occur, may not have yet occurred, or at a minimum has not been documented in this policy debate. Disrupting the existing transfer policy in the absence of a record of such double transfers is legally unwise. Counsel respectfully recommends against stopping the current inter-region transfer policy to address such a corner case, absent proof it is occurring and occurring with sufficient frequency to be a material policy issue.

The disruption of transfers for those currently meeting policy in two regions who have no intention to make a subsequent transfer to a third RIR would be profound. Allowing policy authorized transfers between reciprocal RIR policies permits necessary flexibility and avoids potentially contentious legal issues regarding the rights of number resource holders.

3. Resource Impact

Implementation of this policy would have minimum to moderate resource impact. 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
- * There will be some engineering work to perform; however, that work can be performed post implementation
- * Staff training

4. Proposal / Draft Policy Text Assessed

Draft Policy ARIN-2017-6: Improve Reciprocity Requirement for Inter-RIR Transfers

Version Date: 20 June 2017

Problem Statement:

Currently ARIN's requirement that inter-RIR transfer policies be reciprocal has a glaring hole in it in that RIRs which have NIRs and/or a two-hop RIR transfer process can be used to circumvent the intent of the requirement. Rather than eliminate the requirement, a better approach would be to close the loophole.

Policy statement:

Amend section 8.4 (included here for reference):

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 must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN for the 12 months prior to the approval of a transfer request, unless either the source or recipient entity owns or controls the other, or both are under common ownership or control. This restriction does not include M&A transfers.

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

Conditions on recipient of the transfer:

The conditions on a recipient outside of the ARIN region will be defined by the policies of the receiving RIR.

Recipients within the ARIN region must meet the transfer requirements as defined in section 8.5.

Recipients within the ARIN region will be subject to current ARIN policies.

Make the following change:

Add an additional bullet to "Conditions on recipient" which states:

- + Recipient RIR policy must not permit transfers to other RIRs or NIRs whose policies do not support bi-directional transfers.

Comments:

- a. Timetable for implementation: Immediate

END

Draft Policy ARIN-2017-8: Amend the Definition of Community Network

https://www.arin.net/policy/proposals/2017_8.html

Advisory Council Shepherds: **David Farmer, Andrew Dul**

Latest Version: 24 August 2017

Version Date: 24 August 2017

Problem Statement:

The Community Networks section of the NRPM has not been used since implementation in January 2010. Proposal ARIN-2016-7, to increase the number of use cases, was abandoned by the Advisory Council due to lack of feedback. Proposal ARIN 2017-2, to remove all mention of community networks from NRPM was met with opposition by the community. Many responded that the definition of “community network” was too narrow, which could be the reason for lack of uptake.

Policy statement:

CURRENT NRPM TEXT:

“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.”

NEW NRPM TEXT:

“2.11 Community Network

A community network is a network organized and operated by a volunteer group, not-for-profit, non-profit, charitable organization, or educational institution for the purpose of providing free or low-cost connectivity, or other Information Technology services to persons or entities within their community. Critical functions may be handled by paid staff, but volunteers play a large role in offering services available through community networks.”

Comments:

Timetable for implementation: Immediate

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Earlier Version

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Version Date: 22 August 2017

Problem Statement:

The Community Networks section of the NRPM has not been used since implementation in January 2010. Proposal ARIN-2016-7, to increase the number of use cases, was abandoned by the Advisory Council due to lack of feedback. Proposal ARIN 2017-2,

to remove all mention of community networks from NRPM was met with opposition by the community. Many responded that the definition of “community network” was too narrow, which could be the reason for lack of uptake.

Policy statement:

CURRENT NRPM TEXT:

“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.”

NEW NRPM TEXT:

“2.11 Community Network

A community network is a network organized and operated by a volunteer group, not-for-profit, non-profit, charitable organization, or post-secondary institution for the purpose of providing free or low-cost connectivity to residents in their service area. Critical functions may be handled by paid staff, but volunteers play a large role in offering services available through community networks.”

Comments:

Timetable for implementation: Immediate

POLICY DEVELOPMENT PROCESS

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 (NRPML) 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.

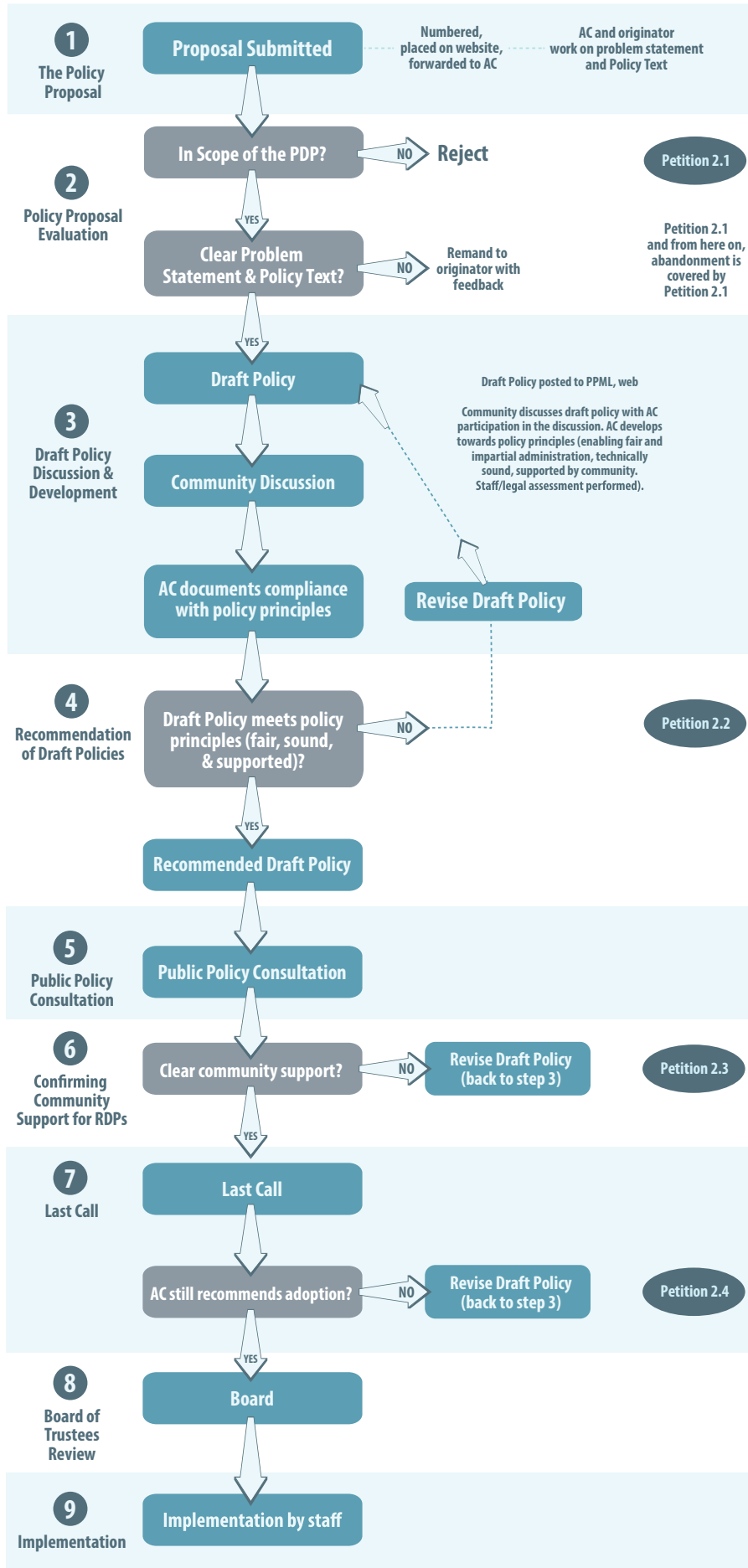
2.3. Petition for Last Call

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



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

Number Resource Policy Manual

Version 2017.4 – 8 August 2017

Abstract

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

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

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

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Appendix A—Change Log

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

1.1. Registration

The principle of registration guarantees the uniqueness of Internet number resources.

Provision of this public registry documenting Internet number resource allocation, reallocation, assignment, and reassignment is necessary:

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

1.2. Conservation

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

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

1.3. Routability

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

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

1.4. Stewardship

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

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

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

2. Definitions

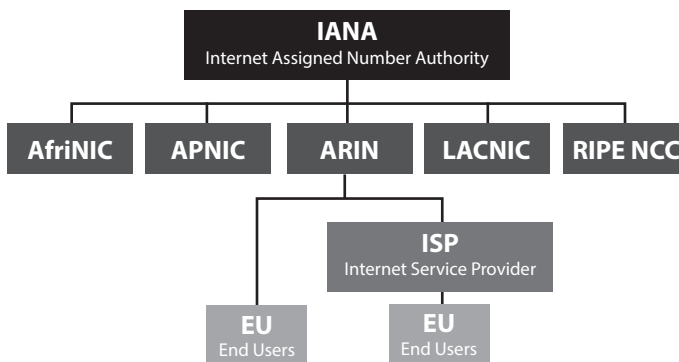
Responsibility for management of address space is distributed globally in accordance with the hierarchical structure shown below.

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. - 2.9. [Section Numbers Retired]

2.10. End site

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

2.11. Community Network

A community network is 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.irtt.net/docs/list.html> URL for information about the replicated Routing Registry data.

3.5. Autonomous System Originations

3.5.1. Collection

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

3.5.2. Publication

3.5.2.1. Description of data

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

3.5.2.2. Bulk publication of data

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

3.5.2.3. Other formats

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

3.6 Annual Whois POC Validation

3.6.1 Method of Annual Verification

During ARIN's 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, 4.1.2., 4.1.3., 4.1.4. [Section Number Retired]

4.1.5. Resource request size

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

4.1.6. Aggregation

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

4.1.7. [Section Number Retired]

4.1.8 Unmet requests

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

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

4.1.8.1 Waiting list

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

4.1.8.2 Fulfilling unmet needs

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

4.1.9. [Section Number Retired]

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

4.2.1. Principles

4.2.1.1. Purpose

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

4.2.1.2. Annual Renewal

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

4.2.1.3. Utilization rate

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

4.2.1.4. Slow start

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

4.2.1.5. Minimum allocation

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

4.2.1.6. 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

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

4.2.3. Reassigning 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 24 month supply
- IP allocations issued through 4.2.3.8 are non-transferable via section 8.3 and section 8.4 for a period of 36 months. In the case of a section 8.2 transfer the IP assignment must be utilized for the same purpose or needs based justification at a rate consistent with intended use.

4.2.4. ISP Additional Requests

4.2.4.1. Utilization percentage (80%)

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

4.2.4.2. Return address space as agreed

Return prior address space designated for return as agreed.

4.2.4.3. Request size

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

4.2.4.4. [Section Number Retired]

4.2.5. - 4.2.6. [Section Numbers Retired]

4.3. End-users - Assignments to end-users

4.3.1. End-users

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

4.3.2. Minimum assignment

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

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

4.3.3. Utilization rate

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

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

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

4.3.4. Additional considerations

End-users may qualify for address space under other policies such as 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

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

4.4. Micro-allocation

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

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

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

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

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

4.5. Multiple Discrete Networks

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

1. The organization shall be a single entity and not a consortium of smaller independent entities.
2. The organization must have compelling criteria for creating discrete networks. Examples of a discrete network might include:
 - 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.
7. Upon verification that the organization has shown evidence of deployment of the new discrete network site, the new network(s) shall be allocated the minimum allocation size under section 4.2.1.5 unless the organization can demonstrate additional need using the immediate need criteria (4.2.1.6).

4.6., 4.7., 4.8., 4.9. [Section Numbers Retired]

4.10 Dedicated IPv4 block to facilitate IPv6 Deployment

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

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

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

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

5. AS Numbers

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

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

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

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

5.1. [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 $4/3 * \text{serving sites}$ and Y is a multiple of 4 greater than $4/3 * \text{end sites served by largest serving site}$.

- 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. [Section Number Retired]

6.5.7. Existing IPv6 address space holders

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

6.5.8 Direct assignments from ARIN to end-user organizations

6.5.8.1. Initial Assignment Criteria

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

- a. Having a previously justified IPv4 end-user assignment from ARIN or one of its predecessor registries, or;
- b. Currently being IPv6 Multihomed or immediately becoming IPv6 Multihomed and using an assigned valid global AS number, or;
- c. By having a network that makes active use of a minimum of 2000 IPv6 addresses within 12 months, or;
- d. By having a network that makes active use of a minimum of 200 /64 subnets within 12 months, or;

- e. By having a contiguous network that has a minimum of 13 active sites within 12 months, or;
- f. By providing a reasonable technical justification indicating why IPv6 addresses from an ISP or other LIR are unsuitable.

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

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

6.5.8.2. Initial assignment size

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

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

More than 1 but less than or equal to 12 sites justified, receives a /44 assignment;

More than 12 but less than or equal to 192 sites justified, receives a /40 assignment;

More than 192 but less than or equal to 3,072 sites justified, receives a /36 assignment;

More than 3,072 but less than or equal to 49,152 sites justified, receives a /32 assignment; etc...

6.5.8.2.1 Standard sites

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

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

6.5.8.2.2 Extra-large sites

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

6.5.8.3 Subsequent assignments

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

- a. A subsequent assignment is justified when the total utilization based on the number of sites justified exceeds 75% across all of an organization's assignments. If the organization received an assignment per section 6.1.1 IPv6 Multiple Discrete Networks, such assignments will be evaluated as if they were to a separate organization.
- b. When possible subsequent assignments will result in the expansion of an existing assignment by one or more nibble boundaries as justified.
- c. If it is not possible to expand an existing assignment, or to expand it adequately to meet the justified need, then a separate new assignment will be made of the size justified.

6.5.8.4 Consolidation and return of separate assignments

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

6.5.9. Community Network Assignments

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

6.5.9.1. Qualification Criteria

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

6.5.9.2. Receiving Resources

Once qualified under this section, a community network shall be treated as an end-user assignment for all ARIN purposes.

Community networks shall be eligible under this section only for IPv6 resources and the application process and use of those resources shall be governed by the existing end-user policy contained in section 6.5.8 et. seq.

Community networks seeking other resources shall remain subject to the policies governing those resources independent of their election to use this policy for IPv6 resources.

6.5.9.3. [Section Number Retired]

6.6. - 6.9. [Section Numbers 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 and 6.5.3 as if it were a separate organization, rather than collectively as would be done for requests outside of this policy.

7. Reverse Mapping

7.1. [Section Number Retired]

7.2. [Section Number Retired]

8. Transfers

8.1. Principles

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

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

Number resources are issued, based on justified need, to organizations, not to individuals representing those organizations. Thus, if a company goes out of business, regardless of the reason, the point of contact (POC) listed for the number resource does not have the authority to sell, transfer, assign, or give the number resource to any other person or organization. The POC must notify ARIN if a business fails so the assigned number resources can be returned to the available pool of number resources if a transfer is not requested and justified.

8.2. Mergers, Acquisitions, and Reorganizations

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

- The current registrant must not be involved in any dispute as to the status of the resources to be transferred.
- The new entity must sign an RSA covering all resources to be transferred.
- The resources to be transferred will be subject to ARIN policies.
- The minimum transfer size is the smaller of the original allocation size or the applicable minimum allocation size in current policy.
- The Internet number resources being transferred as part of an 8.2 transfer will not be subject to a needs-based assessment during the process of the 8.2 transfer.

AND one or more of the following:

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

OR

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

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

Conditions on recipient of the transfer:

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

8.4 Inter-RIR Transfers to Specified Recipients

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

Conditions on source of the transfer:

- The source entity must be the current rights holder of the IPv4 address resources recognized by the RIR responsible for the resources, and not be involved in any dispute as to the status of those resources.
- Source entities outside of the ARIN region must meet any requirements defined by the RIR where the source entity holds the registration.
- Source entities within the ARIN region must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN for the 12 months prior to the approval of a transfer request, unless either the source or recipient entity owns or controls the other, or both are under common ownership or control. This restriction does not include M&A transfers.
- Address resources from a reserved pool (including those designated in Section 4.4 and 4.10) are not eligible for transfer.

Conditions on recipient of the transfer:

- The conditions on a recipient outside of the ARIN region will be defined by the policies of the receiving RIR.
- Recipients within the ARIN region must meet the transfer requirements as defined in section 8.5.
- Recipients within the ARIN region will be subject to current ARIN policies.

8.5 Specified Transfer Recipient Requirements

8.5.1. Registration Services Agreement

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

8.5.2. Operational Use

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

8.5.3. Minimum transfer size

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

8.5.4. Initial block

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

8.5.5. Block size

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

8.5.6. Efficient utilization of previous blocks

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

8.5.7. Alternative Additional IPv4 Address Block Criteria

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

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

9. Out of Region Use

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

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

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

- Demonstrating a physical presence in the ARIN region through a bricks and mortar location that is actually used

for the purposes of conducting business in the ARIN region in a meaningful manner. That is to say, the location is not merely a registered office that serves no other business purpose.

- Demonstrating that the entity has staff in the ARIN region. The greater the number of staff, the stronger this connecting factor is.
- Demonstrating that the entity holds assets in the ARIN region. The greater the asset value, the stronger this connecting factor is.
- Demonstrating that the entity provides services to and solicits sales from residents of the ARIN region.
- Demonstrating that the entity holds periodic meetings in the ARIN region.
- Demonstrating that the entity raises investment capital from investors in the ARIN region.
- Demonstrating that the entity has a registered corporation in the ARIN region, although this factor on its own shall not be sufficient.
- Other fact based criterion that the entity considers appropriate and submits for ARIN's review.

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

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

10. Global Number Resource Policy

10.1. IANA to RIR Allocation of IPv4 Address Space

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

1. Allocation Principles

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

2. Initial Allocations

Each new RIR shall, at the moment of recognition, be allocated a new /8 by the IANA. This allocation will be made regardless of the newly formed RIR's projected utilization figures and shall be independent of the IPv4 address space

that may have been transferred to the new RIR by the already existing RIRs as part of the formal transition process.

3. Additional Allocations

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

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

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

3.1. Calculation of AVAILABLE SPACE

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

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

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

3.2. Calculation of NECESSARY SPACE

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

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

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

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

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

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

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

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

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

4. Announcement of IANA Allocations

When address space is allocated to a RIR, the IANA will send a detailed announcement to the receiving RIR. The IANA will

also make announcements to all other RIRs, informing them of the recent allocation. The RIRs will coordinate announcements to their respective membership lists and any other lists they deem necessary.

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

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

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

1. Allocation Principles

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

2. Initial Allocations

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

3. Additional Allocations

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

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

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

3.1. Calculation of AVAILABLE SPACE

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

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

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

3.2. Calculation of NECESSARY SPACE

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

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

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

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

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

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

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

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

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

4. Announcement of IANA Allocations

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

10.3. IANA Policy for Allocation of ASN Blocks to RIRs

Abstract

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

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

1. Allocation Principles

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

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

2. Initial Allocations

Each new RIR will be allocated a new ASN block.

3. Additional Allocations

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

1. The RIR has assigned/allocated 80% of the previously received ASN block, or

2. The number of free ASNs currently held by the RIR is less than two months need. This projection is based on the monthly average number of ASNs assigned/allocated by the RIR over the previous six months.

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

4. Announcement of IANA Allocations

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

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

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

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

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

10.4.1. Existing Policy Phase

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

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

10.4.2. Exhaustion Phase

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

10.4.2.1. Size of the final IPv4 allocations

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

10.4.2.2. Allocation of the remaining IPv4 Address space

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

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

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

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

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

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

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

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

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

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

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

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

The IANA may make public announcements of IPv4 address transactions that occur under this policy. The IANA will make appropriate modifications to the “Internet Protocol V4 Address Space” page of the IANA website and may make announcements to its own appropriate announcement lists. The IANA announcements will be limited to which address

ranges, the time of allocation, and to which Registry they have been allocated.

11. Experimental Internet Resource Allocations

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

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

The following are the criteria for this policy:

11.1. Documentation of recognized experimental activity

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

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

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

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

11.2. Technical Coordination

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

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

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

11.3. Coordination over Resource Use

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

11.4. Resource Allocation Term and Renewal

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

11.5. Single Resource Allocation per Experiment

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

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

11.6. Resource Allocation Fees

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

11.7. Resource Allocation Guidelines

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

All research allocations must be registered publicly in whois. Each research allocation will be designated as a research allocation with a comment indicating when the allocation will end.

11.8. Commercial Use Prohibited

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

11.9. Resource Request Appeal or Arbitration

ARIN reserves the ability to assess and comment on the objectives of the experiment with regard to the requested amount of Numbering Resources and its technical coordination. ARIN reserves the ability to modify the requested allocation as appropriate, and in agreement with the proposer.

In the event that the proposed modifications are not acceptable, the requesting organization may request an appeal or arbitration using the normal ARIN procedures. In this case, the original proposer of the experimental activity may be requested to provide additional information regarding the experiment, its objectives and the manner of technical coordination, to assist in the resolution of the appeal.

12. Resource Review

1. ARIN may review the current usage of any resources maintained in the ARIN database. The organization shall cooperate with any request from ARIN for reasonable related documentation.
2. ARIN may conduct such reviews:
 - a. when any new resource is requested,
 - b. whenever ARIN has reason to believe that the resources were originally obtained fraudulently or in contravention of existing policy, or
 - c. whenever ARIN has reason to believe that an organization is not complying with reassignment 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