



Draft Policy ARIN-2020-6: Allowance for IPv4 Allocation “Swap”  
Transactions via 8.3 Specified Transfers and 8.4 Inter-RIR Transfers

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# Problem Statement

## Summary:

- Sections 8.3 and 8.4 of NRPM currently prevent an organization that has received IPv4 addresses within the previous 12 months from transferring any v4 space they hold to a third party.
- Orgs that only need a small portion of a larger block they currently hold often want to receive a smaller block to renumber onto and then transfer their larger original block in tact to a third party as a single prefix (“swapping” the smaller block for the larger one), rather than breaking up the larger block and retaining a small piece of it. The 12 month hold period creates a practical barrier to this and encourages disaggregation.

(full problem statement is in your meeting materials and online)

# Policy Statement

Add a sub-bullet to each of:

Section 8.3, under “Conditions on Source Of the Transfer”:

Section 8.4, under “Conditions on Source Of the Transfer”:

As follows:

... *[text specifying waiting period requirement for sources]* ...

- This requirement may be waived by ARIN if the source entity is transferring resources as part of a renumbering plan designed to more efficiently utilize number resources, for example, having received a smaller block (via waitlist or transfer) with the intention of renumbering into that block and then transferring their pre-existing larger allocation to another specified recipient.

# History

Proposal	31 May 2020
Draft Policy	23 June 2020

# PPML Feedback

No direct feedback received to the proposal.

One comment requested clarification of two hypotheticals in response to the Staff and Legal review.

1. Org with a /16 receives a /22 from the waitlist in order to renumber onto the /22 and transfer the /16 to a third party in tact. /22 received from waitlist for renumbering, but /16 is not transferred during the agreed-upon renumbering period.
  - a. Staff response: Staff does not recommend allowing waitlist space to be received for this purpose. Org should look to the transfer market to acquire the smaller block.
2. Org A arranges swap with Org B. Org A receives smaller block to renumber into from Org B, but subsequently refuses to transfer larger block to Org B in accordance with their agreement.
  - a. Staff response: Primarily a contractual problem between organizations involved, however, ARIN will track such behavior and deny future resource acquisitions by Org A.

# Staff and Legal

- Staff currently allows these types of exchanges for renumbering purposes, but the current language of NRPM does not make it clear to organizations that do not ask.
- Staff suggests considering three points as a community:
  1. Upper limits for these smaller allocations
  2. Acceptable timeframe within which the organization must transfer the larger block
  3. Restricting waitlist space from use in these scenarios

# This is still a Draft Policy

- Do you support continued development in this direction?
- What specific modifications would you like to see?
- Thoughts on upper limits of smaller allocations?
- Thoughts on timeframe limitations for renumbering?
- Opinions on waitlist prohibitions?
- Other comments?

Thanks!

Any

Questions?

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