

Recommended Draft Policy ARIN-2023-7: Clarification of NRPM Sections 4.5 and 6.11 Multiple Discrete Networks

Chris Woodfield and Elizabeth Goodson



Problem Statement

Current Text (20 August 2024)

Section 4.5 and 6.11 of the NRPM does not adhere to the style guide used by the remainder of the document. The numbered lists in these two sections also detracts from the readability and usability of the NRPM.

Policy Statement

Current:

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:
3. Regulatory restrictions for data transmission,
4. Geographic distance and diversity between networks,
5. Autonomous multihomed discrete networks.

Policy Statement (cont.)

6. The organization must keep detailed records on how it has allocated space to each location, including the date of each allocation.
7. 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.
8. The organization may not allocate additional address space to a location until each of that location's address blocks are 80% utilized.
9. The organization should notify ARIN at the time of the request their desire to apply this policy to their account.
10. 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.

Policy Statement (cont.)

Proposed:

Replace Section 4.5 in its entirety with the following text:

4.5 Multiple Discrete Networks

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

1. The organization must 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 situations which may represent compelling criteria for multiple discrete networks might include:
 - Regulatory restrictions for data transmission;
 - Geographic distance and diversity between networks; or
 - Autonomous multihomed discrete networks.

Policy Statement (cont.)

3. The organization must keep detailed records on how it has allocated IP addresses to each location, including the date of each allocation.
4. When applying for additional IP address allocations from ARIN, the organization must demonstrate utilization greater than 50% of both the last IP addresses allocated and the aggregate sum of all IP addresses 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 IP address allocations by having all unallocated IP address blocks smaller than ARIN's current minimum allocation size.
5. The organization must not allocate additional IP address space to a location until each of that location's IP address allocations are 80% utilized.

The organization must notify ARIN at the time of the request of their desire to apply this policy to their account.



Policy Statement (cont.)

Current:

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.

Policy Statement (cont.)

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:
6. Organization must specify on the application which discrete network(s) the request applies to
7. 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.



Policy Statement (cont.)

Proposed:

Replace Section 6.11 in its entirety with the following text:

6.11. IPv6 Multiple Discrete Networks

Organizations with multiple discrete IPv6 networks desiring to request new or additional IPv6 address allocations under a single Organization ID must meet the following criteria:

1. The organization must 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 situations which may represent compelling criteria for multiple discrete networks might include:
 - Regulatory restrictions for data transmission;
 - Geographic distance and diversity between networks; or
 - Autonomous multihomed discrete networks.

Policy Statement (cont.)

3. The organization must keep detailed records on how it has allocated IPv6 addresses to each location, including the date of each IPv6 address allocation.
4. When an organization is requesting additional IPv6 address allocations under this policy, the organization must specify on the application which discrete network(s) the IPv6 address request applies to. A request for additional space 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.

The organization must notify ARIN at the time of the request their desire to apply this policy to their account.

Timetable for Implementation: Immediate

Recommended Draft Policy ARIN-2023-7:
Clarification of NRPM Sections 4.5 and 6.11 Multiple Discrete Networks

Action	Date
Proposal	17 August 2023
Draft Policy	26 September 2023
Revised	19 December 2023
Recommended Draft Policy	21 February 2024
Draft Policy	22 April 2024
Revised	20 June 2024
Revised	20 August 2024
Recommended Draft Policy	24 September 2024

Staff and Legal Review (30 July 2024)

Staff Understanding:

This policy corrects and reorganizes the numbered bullets in section 4.5 and 6.11 for clarity.

Additional edits were made to include “Allocation”, reflecting ARIN’s deprecation of “Assignment”.

ARIN staff suggests the following editorial changes for consistency:

- Section 4.5 item 4 change:
 - “Internet Resource allocations” to “IP address allocations”; and
 - “internet IP allocations” to “IP address allocations”
- Section 6.11 item 4 change:
 - “additional space” to “additional IPv6 address allocations”
- Section 4.5 and 6.11, item 2 example bullets:
 - We recommend ending the second bullet in each section with “; or”.



Staff and Legal Review

Implementable as Written?: Yes

Impact on ARIN Registry Operations and Services: None

Legal Review: No material legal issue

Implementation Timeframe Estimate: 3 months

Implementation Requirements:

- Staff training
- Updates to public documentation
- Updates to internal procedures and guidelines

Proposal/Draft Policy Text Assessed: 20 June 2024

Recommended changes noted in this review have been implemented in the policy text.

Community Feedback

- Initial Public Policy Mailing List (PPML) feedback generally positive, no apparent lack of support.
- At ARIN 53, community feedback noted that revised formatting still suffered from clarity issues, changes suggested and taken under advisement. Moved proposal back to Draft Policy in recognition of the need for substantial changes.
- Revised policy text and formatting; new version published to PPML. No additional feedback received on list to date.
- As such, the AC will be weighing support in this meeting as a primary signal of community support.



Policy Impact

- The removal of the term “Assignment” from the modified policy text anticipates the adoption of RDP ARIN-2022-12, which deprecates the term.
- If this policy is adopted without ARIN-2022-12's changes, the removal of the term “Assignment” may lead to less clarity in terms of how assignments (not allocations) are handled by this policy.
- The AC reminds you that policies should be considered independently; given community feedback, we believe this policy can stand on its own.

Questions for the Community



Do you support this policy as written?