

# Draft Policy 2011-11 Clarify Justified Need for Transfers



## 2011-11 - History

- 1. Origin: ARIN-prop-146 (May 2011)
- 2. AC Shepherds: Chris Morrow, Dan Alexander
- 3. AC selected as Draft Policy (Aug 2011)
- 4. Current version: 24 Aug 2011
- Text and assessment online & in Discussion Guide https://www.arin.net/policy/proposals/2011\_11.html



This proposal would modify existing NRPM policy 8.3 to state that all organizations can justify a 12 month supply of IPv4 addresses.

Currently, the only reference to a timeframe for 8.3 transfers is contained in NRPM 4.2.2.4, Subscriber Members After One Year, which says that 8.3 transfers are exempt from the 3 month supply limitation that all other ISPs who are requesting additional IPv4 space must adhere to -"An organization receiving a transfer under section 8.3 may continue to request up to a 12-month supply of IP addresses." This proposal would remove this reference and instead, add the 12 month language to the proper section of NRPM.

### PHiladelphia 12-14 OCT 2011



### 2011-11 – Status at other RIRs

### Nothing similar at the other RIRs





# 2011-11 – Staff Assessment

### Staff Comments: Issues/Concerns?

- 1. This proposal would still require an organization requesting an 8.3 transfer to qualify for the space under current ARIN policies, but would exempt them from the 3 month supply limitations currently set forth in NRPM 4.2.1.4 "Slow Start" and 4.2.2.1.3 "Three Months" and instead allow them to qualify for a 12 month supply of IPv4 address space.
- 2. If this became policy, it would align well with NRPM 8.2 (Transfers due to M&A) since the staff uses a 12 month utilization window when analyzing these types of transfer requests.

Implementation: Resource Impact? – Minimal (3 mos.)

- Updated guidelines
- Staff training

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This policy presents no significant legal issues.

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## 2011-11 – PPML Discussion

- Little discussion of Draft Policy
- Earlier discussion of proposal: 108 posts by 19 people (2 in favor and 2 against)
- "Loosening transfer rules serves to help ensure transfers go through the RIR and are properly cataloged. More stringent transfer rules help to promote alternative approaches to acquiring IP resources that don't necessarily get cataloged."
- "Give bigger chunks of scarce IPV4 space to \_NEW\_ entrants simply "Because I can afford it and have taken the time to find a seller."? Insufficient information, at best."





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