Recommended Draft Policy ARIN-2019-8 Clarification of Section 4.10 for Multiple Discrete Networks

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Current Text (21 May 2019)

AC Assessment of Conformance with the Principles of Internet Number Resource Policy:

The Advisory Council moved ARIN-2019-8 Clarification of section 4.10 for Multiple Discrete Networks to recommended draft status. The proposed policy will enable fair distribution of resources, is technically sound, and has received support from the community.

Problem Statement:

Currently, applicants for IPv4 resources under section 4.10 of the NRPM who do so under a single OrgID of the NRPM may only obtain one /24 every six months for the OrgID, even in the case where multiple discrete networks (MDNs) as defined in section 4.5 of the NRPM are grouped under that OrgID. On the other hand, where MDNs are held under different OrgIDs associated the same entity, the six-month constraint would apply to each discrete network separately. This results in unfair allocations of resources based solely on how entities choose to associate MDNs with their OrgIDs. This policy rectifies that problem by placing MDNs on an equal footing for the purpose of section 4.10 allocations regardless of how they are grouped by OrgID by the same ultimate entity.

Policy Statement:

Bullet 1. under section 4.10 of the NRPM is amended to read:

the applicant may not have received resources under this policy in the preceding six months, except to the extent that the applicant is requesting resources for a discrete network in respect of which it has not received any resources under this policy in the preceding six months;

Add a new bullet 6 that reads:

• An applicant requesting multiple allocations under this policy to support Multiple Discrete Networks, as defined under Section 4.5, may not receive more than the equivalent of a /21 of IPv4 address space in any one six-month period hereunder.

Timetable for Implementation: Immediate

Anything Else: To what extent should the passage of this policy be contingent or independent of whether any ultimate cap is imposed on the total quantity of IPv4 resources that an entity can obtain under section 4.10 regardless of the number of OrgIDs associated with the entity or number of MDNs it holds.

Staff and Legal Review (22 July 2019)

Summary (Staff Understanding)

This draft policy retains the requirement that any organization, with a single network, may request a /24 from the reserved pool for 4.10 Dedicated IPv4 Block to Facilitate IPv6 Deployment provided they have not received a direct allocation or direct assignment from the reserved pool during the previous six months.

This draft policy adds two additional criteria which details:

- that an organization may request a /24 from the reserved pool for 4.10 Dedicated IPv4 Block to Facilitate IPv6 Deployment for each discrete network provided the discrete network has not received a direct allocation or direct assignment from the pool within the preceding six months.
- an organization may not receive more than a /21 equivalent from the reserved pool for 4.10 Dedicated IPv4 Block to Facilitate IPv6 Deployment during any 6 month period

Comments

ARIN Staff Comments

Staff implementation would be:

- An organization, regardless of the number of discrete networks they have, may only
 receive a total of a /21 equivalent from reserved pool for 4.10 Dedicated IPv4 Block to
 Facilitate IPv6 Deployment.
- Organizations with a single network may only receive one /24 every six months
- Organization with discrete networks may request one /24 for each discrete network every six months with the six month "waiting period" being assessed to each discrete network
- The /21 equivalent maximum for a 6 month period will include all space received from the reserved for 4.10 Dedicated IPv4 Block to Facilitate IPv6 Deployment even if issued prior to adoption of this policy

ARIN General Counsel – Legal Assessment

The Policy does not create material legal issues.

Resource Impact

Implementation of this policy would have minimum 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:

- Staff training
- Updated guidelines and internal procedures
- Updated documentation on website

Proposal/Draft Policy Text Assessed: 21 May 2019 Version

History and Earlier Versions

History	
Action	Date
<u>Proposal</u>	8 April 2019
Draft Policy	21 May 2019
Recommended Draft Policy	20 August 2019
Last Call	5 November 2019