

Recommended Draft Policy ARIN-2019-21

Reserved Pool Replenishment

Status: Last Call

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Current Text (17 February 2020)

AC Assessment of Conformance with the [Principles of Internet Number Resource Policy](#):

Draft policy 2019-21 enables fair number resource policy and is technically sound. It has the apparent support of the community.

Problem Statement:

While the current level of resources in the reserve pools created in Sections 4.4 and 4.10 presently seem more than adequate for their intended purposes. Nevertheless, even these well-resourced pools will eventually run out. Therefore, we should make arrangements for their replenishment, if or when necessary.

Policy Statement:

Add a new subsection in IPv4 General Principles, Section 4.1;

4.1.X Reserved Pool Replenishment

4.1.X.1 Disposition of Resources

Any resources allocated from a reserved pool created in Sections 4.4 or 4.10, or any other reserved pools created in the future, that become available for re-issuance will be returned to the reserved pool they were originally allocated from, regardless of the current level of each pool. Further, any other resources which become available for re-issuance will be prioritized for the replenishment of any reserved pool that falls below a running three-year supply, which is based on the previous three years of allocations from each pool.

4.1.X.2 Precedence for Replenishment

Staff shall return groups of blocks to the pools in scheduled batches (staff shall set a reasonable schedule). Each available block in a batch shall be returned in order from largest to smallest to the pool which at that point has the lowest percentage of a 3-year supply for that particular pool.

Timetable for Implementation: Upon Passage

Anything Else:

ARIN Staff should regularly report on the levels and projected run-times for each reserved pool and immediately report when any reserved pool falls below a three-year running supply.

A three-year running supply was chosen to provide the ARIN Policy Community adequate time to react through policy, as deemed appropriate at that time, to an imminent run out event for one of the reserved pools.

Staff and Legal Review (7 February 2020)

Summary (Staff Understanding)

ARIN staff understanding is that Draft Policy ARIN-2019-21 will require a new section to be added to the NRPM under section 4.1 and would be titled “4.1.X. Reserved Pool Replenishment”. The new section directs any and all allocated/assigned IPv4 number resources from any reserve pool (such as 4.4 or 4.10) be returned to their respective pool if they are ever returned to ARIN through whatever means. It further states ANY IPv4 number resource returned to ARIN through whatever means will be prioritized for replenishment of any reserve pool that has fallen below a running three year supply based on the last three years.

Comments

ARIN Staff Comments

Draft Policy 2019-21 is well written and easy to understand. There is one improvement that could be made and that is which reserved pool would have priority if both 4.4 and 4.10 pools fell below a three year threshold at the same time. If new reserved pools came about then they would also need to be prioritized. ARIN staff understands that we will need to keep track of the three year requirement for each pool and advise the community of same.

ARIN staff recommends that as resources come back to ARIN by a variety of means (returned, reclaimed, revoked, etc), that instead of referring to returned resources that the policy should refer to “IPv4 number resources that become available for re-issuance.”

ARIN General Counsel – Legal Assessment

If the ARIN staff comment ‘as resources come back to ARIN by a variety of means (returned, reclaimed, revoked, etc), that instead of referring to returned resources that the policy should refer to “IPv4 number resources that become available for re-issuance” is adopted, there are no material legal issue. If it is not adopted there are material legal issues in the current draft. Not all revoked resources can be immediately provided for reissuance. Some may need to be held for be held, for example, because they are subject to further litigation, or the necessity to not make them available for other reasons. The ‘become available’ language addresses those possibilities.

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:

- Staff training
- Updated guidelines and internal procedures
- Standard documentation updates

Proposal/Draft Policy Text Assessed: [23 December 2019 Version](#)