



### **DISCUSSION GUIDE**

**The American Registry for Internet Numbers, a nonprofit** member-based organization, supports the operation of the Internet through the management of Internet number resources throughout its service region; coordinates the development of policies by the community for the management of Internet **Protocol number resources;** and advances the Internet through informational outreach.

# Welcome to the ARIN 50 Public Policy and Members Meeting!

Policies in the ARIN region are developed by the Internet community using the open and transparent ARIN Policy Development Process (PDP). The Internet community develops policies via discussion on the ARIN Public Policy Mailing List (PPML), at ARIN Public Policy Consultations (PPCs), and at ARIN Public Policy and Members Meetings. Anyone may participate in the process – ARIN membership is not required.

The ARIN Board of Trustees adopts Recommended Draft Policies forwarded by the ARIN Advisory Council if the Board determines that the PDP has been followed, that support and consensus for policies has been reached among the community, and if the Draft Policies are consistent with ARIN's Articles of Incorporation, Bylaws, and applicable laws and regulations.

The ARIN Public Policy and Members Meeting is conducted in an orderly manner to understand the sense of the majority, to respect the views of the minority, and to protect the interests of those absent. Accordingly, the flow of the meeting is structured according to a published agenda and participants are expected to follow Meeting Courtesies, Expected Standards of Behavior, and Rules of Discussion.

# What's Inside

#### FOR DISCUSSION

This document contains the Draft and Recommended Draft Policies on the agenda for this Public Policy and Members Meeting.

Draft Policies are works in progress and are included in this document to assist with discussion. This text is subject to change, and the most up-to-date text is always available on the ARIN website at: https://www.arin.net/participate/policy/drafts/

Included at the end of this document are copies of ARIN's Policy Development Process (PDP) and Number Resource Policy Manual (NRPM).

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## ARIN Participants Expected Standards of Behavior

Those who take part in any ARIN meeting, conference or event including but not limited to Public Policy and Member Meetings, ARIN on the Road, ARIN In the Caribbean, etc., and related activities (including but not limited to ARIN staff, members of the Board of Trustees, Advisory Council (AC), Number Resource Organization Number Council (NRO NC), and ARIN meeting attendees) must:

- Treat each other with civility, courtesy and respect (both face-to-face and online), regardless of the sex, race, color, national origin, marital status, age, religion, disability, sexual orientation, occupation, line of business, or policy position of other participants.
- Make reasonable and informed comments when participating in policy development and decision-making discussions and processes.
- Listen respectfully to the views of all stakeholders when considering policy issues.
- Take responsibility for the success of the ARIN Policy Development Process by trying to build consensus with other participants and find solutions to issues.
- Act fairly and in good faith with other participants in the ARIN process.
- Act in accordance with ARIN's Policy Development Process when participating in ARIN public policy events. The ARIN model is based on a bottom-up, consensus-driven approach to policy development.

Further, those who participate in ARIN events and related activities must foster an environment that is free from any form of discrimination and conduct that is harassing, coercive, or disruptive. ARIN prohibits harassment in any form – verbal, physical or visual – and will not tolerate discriminatory harassment or inappropriate conduct of a harassing nature directed against any individual on the basis of gender, race, creed, color, national origin, nationality, ancestry, marital status, age, religion, disability, sexual orientation, gender identity, or any other legally protected characteristic.

Sexual harassment is a form of gender discrimination that is unlawful and violates this policy. For purposes of this policy, sexual harassment is defined generally to include unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when such conduct is made a condition of an individual's employment or participation, used as the basis for decisions, or has the effect of substantially interfering with an individual's performance or creating a hostile environment. Sexually harassing conduct, as well as inappropriate conduct of a harassing nature, is prohibited. Examples of prohibited conduct include, but are not limited to: (1) sexually-oriented kidding, teasing, gestures or jokes; (2) offensive or unwelcome sexual flirtations, advances, or propositions; (3) verbal abuse of a sexual nature; (4) graphic or verbal comments, epithets, or slurs about an individual's body; (5) sexually degrading words used to describe an individual; (6) the display or transmission (e.g., e-mail, text or social media) of sexually suggestive or sexually explicit materials (such as magazines, videos, pictures, cartoons or posters); (7) inquiries into another individual's sexual experiences and activities or discussion of one's own sexual experiences and activities; and (8) unwelcome intentional touching of another person or other unwanted intentional physical conduct.

ARIN is committed to supporting a productive and safe environment for all participants at ARIN events. Any ARIN participant who believes there has been a violation of this policy should either promptly bring the incidents to the attention of the person chairing the teleconference or meeting, or report them via the ARIN Mailing List Acceptable Use Policy if the incident occurs on an ARIN mailing list. Participants may alternatively report suspected violations to ARIN's General Counsel, Michael Abejuela (mabejuela@arin.net).

# **Rules of Discussion**

The Chair moderates discussions of formal draft policies so that all can speak and all can be heard. Accordingly, every person who participates in a Public Policy Consultation is asked to follow these simple rules and customs:

- 1. All persons have equal rights, privileges, and obligations.
- 2. Full and free discussion of all draft policies is the right of every person participating in the meeting.
- 3. Only one policy is considered at a time.
- 4. Persons should not speak in the discussion until they have moved to a designated speaker's position and have been recognized by the Chair and granted the floor.
- 5. Every time a speaker is recognized by the Moderator, speakers should do the following:
  - a. State their name.
  - b. State intent to support or not support the policy under discussion.
- 6. No person should speak a second time on the same topic if anyone who has not spoken on that topic wishes to do so.
- 7. No person should speak for more than three minutes unless the Moderator gives consent.
- 8. Speakers should direct all remarks to the Moderator. They should not debate with other speakers or otherwise attack or question the motives of other speakers.
- 9. While the discussion is in progress, speakers may suggest amendments or other secondary proposals to the Moderator, who will see them acted on accordingly.
- 10. Only the Moderator may call for a poll to gain a sense of the participants regarding the policy under discussion, any part of that policy, any proposed amendment to that policy, or any secondary proposal. The Chair will state all questions before polling responses mean.

### **Recommended Draft Policy ARIN-2020-6**

Allowance for IPv4 Allocation "Swap" Transactions via 8.3 Specified Transfers and 8.4 Inter-RIR Transfers

**STATUS:** Under Discussion **SHEPHERDS:** Rob Seastrom, Amy Potter

https://www.arin.net/participate/policy/drafts/2020\_6/

Current Text (2 May 2022)

#### AC ASSESSMENT OF CONFORMANCE WITH THE PRINCIPLES OF INTERNET NUMBER RESOURCE POLICY:

Draft Policy 2020-6 is fair, impartial, and technically sound. The intent of this policy is to eliminate confusion by codifying existing processes for downsizing IPv4 allocations and assignments within the written policy of the NRPM. It has the apparent support of the community.

#### **PROBLEM STATEMENT**

Organizations wishing to "swap out" a larger block for a smaller one in the interest of avoiding deaggregation (as opposed to breaking up their existing block and transferring only a part of it) are forbidden by existing 8.3 policy from being the source of the transfer for their larger block after receiving a smaller one for 12 months after receiving the smaller block. In practice, ARIN staff has been allowing orgs to transfer out blocks after receiving smaller ones inside of the 12-month window, but many ARIN resource holders are not aware of this. Some resource holders have worked around the restriction by creating a new org to receive the smaller block, but this practice has implications on waitlist policy, as the new org is now technically eligible to apply for wait-list space while the original org cannot.

Similar language is present in NRPM Section 8.4, as such, the practice should be sanctioned for those types of transfers as well.

#### POLICY STATEMENT

Clarify the conditions under 8.3 and 8.4 that explicitly allows transfer of a larger block in exchange for a smaller one as part of a renumbering plan by making the following changes in 8.3, 8.4, and 8.5:

*Current text:* 

8.5.5. Block Size

Organizations may qualify for the transfer of a larger initial block, or an additional block, by providing documentation to ARIN which details the use of at least 50% of the requested IPv4 block size within 24 months. An officer of the organization shall attest to the documentation provided to ARIN.

Add:

8.5.5.1- Transfer for the Purpose of Renumbering

**View Policy History** 

on arin.net

Organizations with larger direct allocations or assignments than they require may receive transfer of a smaller block for the purpose of renumbering onto the smaller block if they transfer the entire larger block to a qualified recipient under section 8 within one year of receipt of transfer of the smaller block. If the larger block is not transferred within one year of receipt of the smaller block, the organization will be ineligible to receive any further transfers under this section until the larger block is transferred.

#### 8.5.5.1.1 Smaller Block Size

Organizations may qualify to receive transfer of a smaller block by providing documentation to ARIN which details the use of at least 50% of the smaller block size within 24 months. Current use of the larger block may be used to satisfy this criteria.

Current text:

#### 8.5.6. Efficient Utilization of Previous Blocks

Organizations with direct assignments or allocations from ARIN must have efficiently utilized at least 50% of their cumulative IPv4 address blocks in order to receive additional space. This includes all space reassigned to their customers.

Add:

8.5.6.1 Transfer for the Purpose of Renumbering

Organizations receiving transfer of a smaller block under section 8.5.5.1 may deduct the larger block they are transferring to a qualified recipient when calculating their efficient utilization of previous blocks under section 8.5.6.

Current Text:

Sections 8.3 and 8.4, under "Conditions on Source Of the Transfer":

The source entity must not have received a transfer, allocation, or assignment of IPv4 number resources from ARIN for the 12 months prior to the approval of a transfer request. This restriction does not include 8.2 transfers.

Change to:

With the exception of M&A transfers under section 8.2, the source entity must not have received a transfer, allocation, or assignment from ARIN for the past 12 months. This requirement may be waived by ARIN for transfers made in connection with a renumbering exercise designed to more efficiently utilize number resources under section 8.5.5.1.

#### TIMETABLE FOR IMPLEMENTATION: Immediate

#### **STAFF AND LEGAL REVIEW (7 DECEMBER 2021)**

**STAFF UNDERSTANDING**: ARIN-2020-6 would allow organizations, by request, to receive a smaller IPv4 block to renumber into prior to conducting a specified transfer under NRPM 8.3. or 8.4. Further, it seeks to prevent organizations from creating new Org IDs just to receive a smaller block so that the larger block may be transferred.

This Draft Policy would effectively codify the practice of obtaining and renumbering into a smaller block prior to conducting a transfer as a source, preventing the need for workarounds.

Staff recommends changing the verbiage of:

If the larger block is not transferred within one year of receipt of the smaller block, the smaller block will be ineligible for transfer under sections 8.3 and 8.4, and the organization will be ineligible to receive any further transfers under this policy.

To:

If the larger block is not transferred within one year of receipt of the smaller block, the organization will be ineligible to receive any further transfers under this section until the larger block is transferred.

With regard to proposed 8.3 and 8.4 "Conditions on Source of the Transfer" text, there is potential ambiguity; staff suggests consideration of more direct language that states for transfers made to fulfill the requirements of 8.5.5.1 rather than a general reference to transfers in connection to other requirements.

Finally, it is notable that the officer attestation requirement stated in 8.5.5.1.1 (carried over from current 8.5.5 language) has been deprecated for IPv4 requests. Staff suggests removing this language, either as a part of this Draft Policy or in a future change for consideration.

#### **IMPLEMENTABLE AS WRITTEN?** Yes

#### IMPACT ON ARIN REGISTRY OPERATIONS AND SERVICES None.

**LEGAL REVIEW:** In concept, the proposed policy does not have any material legal issue; however, legal suggests considering the clarifications proposed in Staff Understanding as it may avoid confusion in terms of interpretation and implementation.

#### **IMPLEMENTATION TIMEFRAME ESTIMATE: 3** months

#### **IMPLEMENTATION REQUIREMENTS**

- Staff training
- Updates to public documentation
- Updates to internal procedures and guidelines
- Restricting waitlist space from use in these scenarios

#### PROPOSAL/DRAFT POLICY TEXT ASSESSED: 26 August 2021 Version

Make Abuse Contact Useful

**STATUS:** Under Discussion **SHEPHERDS:** Amy Potter, Alyssa Quinn

https://www.arin.net/participate/policy/drafts/2021\_7/

Current Text (17 December 2021)

#### **PROBLEM STATEMENT:**

ARIN's process of attaching an abuse contact to resource records is of limited utility. The phone number is often an unmanned voicemail that refers the caller to a web page while the email address is commonly an auto-responder which does the same. Because the emails often involve problematic content they can get lost in filters making it hard to even find the URL let alone get an abuse report to go through. This is further exacerbated by folks who write programs to automatically generate unverified abuse reports and email them to the ARIN contact, flooding the mailbox with useless reports that no human being is assigned to look through.

With responsible network providers, the process for dealing with network abuse instead usually starts with a web page. The web page provides instructions and may offer forms for describing the abuse and uploading supporting material of the nature that the service provider needs in order to take action.

It would be helpful for ARIN to support the abuse reporting process they actually use.

#### **POLICY STATEMENT:**

Section 2.12- add "Organizations may provide an optional abuse URL for reporting abuse" to end of paragraph.

Section 4.2.3.7.3.2: add "and may have an optional abuse URL" after "Each private downstream residential reassignment must have accurate upstream Abuse and Technical POCs" so the sentence reads...

"Each private downstream residential reassignment must have accurate upstream Abuse and Technical POCs and may have an optional abuse URL visible on the WHOIS or Distributed Information Service record for that block."

Section 6.5.5.3.1: add "and may have an optional abuse URL" after "Each private downstream residential reassignment must have accurate upstream Abuse and Technical POCs" so that the sentence reads

"Each private downstream residential reassignment must have accurate upstream Abuse and Technical POCs and may have an optional abuse URL visible on the WHOIS or Distributed Information Service record for that block."

#### TIMETABLE FOR IMPLEMENTATION: Whenever

**ANYTHING ELSE:** Initial implementation suggested to replace the abuse POC with a URL pointing to ARIN's display of the same POC record which was used for abuse reporting.

Should support multiple URLs so that if desired an organization can specify both "mailto:somebody@here" and "tel:1234567" if that's how they actually want abuse reported to them.

#### STAFF AND LEGAL REVIEW (14 MARCH 2022)

**STAFF UNDERSTANDING:** ARIN-2021-7 would update several sections of the NRPM relating to Abuse Contacts, with the specific allowance and addition of a URL for abuse reporting, rather than solely a contact person. Staff understands the proposed changes in the Policy Statement to be a straightforward direction for Abuse Contact creators to utilize the existing "Public Comment" section of the contact record.

The Problem Statement and Comments appear to allude to replacing/changing the record itself, which staff understands is no longer the intent of the Draft Policy itself. Staff notes that the Draft Policy title and comments on alternative implementation may be confusing to some, as the record itself is not being changed by suggested policy text.

#### IMPLEMENTABLE AS WRITTEN?: Yes

**IMPACT ON ARIN REGISTRY OPERATIONS AND SERVICES:** This change would necessitate instructional text for the public comment field during Point of Contact Record creation workflow.

LEGAL REVIEW: No material legal issue.

#### **IMPLEMENTATION TIMEFRAME ESTIMATE:** Three months

#### **IMPLEMENTATION REQUIREMENTS:**

- Minor updates to ARIN Online
- Community outreach upon implementation within ARIN Online
- Staff training
- Updates to public documentation
- · Updates to internal procedures and guidelines

#### **PROPOSAL/DRAFT POLICY TEXT ASSESSED:**

17 December 2021

#### Deprecation of the 'Autonomous System Originations' Field

### View Policy History on arin.net

**STATUS:** Under Discussion

SHEPHERDS: Alicia Trotman, Anita Nikolich

https://www.arin.net/participate/policy/drafts/2021\_8/

Current Text (13 September 2022)

#### **PROBLEM STATEMENT:**

In the last two decades ARIN has developed multiple services which provide mechanisms for Internet Number Resource holders to publish information about their routing intentions.

The optional 'OriginAS' field was invented before RPKI existed in practice. At that time, ARIN's Internet Routing Registry (IRR) followed a weak authorization model compared to available and in use today such as RPKI. The 'OriginAS' data was an improvement compared the other mechanisms that were available at that time.

However, there are issues with consumption of the data in the OriginAS field:

Consuming the 'OriginAS' field in a high-scale automated pipeline is challenging. The consumer needs to enter into a 'Bulk Whois Data' agreement with ARIN, download a multiple-gigabytes XML file (which is only generated once a day), parse this XML file, and then extract the OriginAS field. Querying objects one-by-one via the HTTPS interface does not scale well.

#### **POLICY STATEMENT:**

- Remove Section 3.5 "Autonomous System Originations" of the NRPM in its entirety.
- Removal of 'OriginAS' field from the database

#### TIMETABLE FOR IMPLEMENTATION:

- Immediate after ARIN Board adoption.
- December 31st 2024.

#### STAFF AND LEGAL REVIEW (5 OCTOBER 2022)

**STAFF UNDERSTANDING:** ARIN-2021-8 would remove the entirety of ARIN policy surrounding Autonomous System Originations, including guidelines for ARIN's origin AS data collection and publication.

As stated in a previous staff and legal review, the problem statement identifies issues with efficient access to OriginAS data, but the policy statement proposes elimination of the data altogether, rather than proposing potential solutions to the identified shortcomings. Staff recommends careful consideration of impacted customers and their ability to find alternatives to information contained in the OriginAS field within the stated implementation timeframe.

Staff understands this Draft Policy to have two implementation milestones; one for removal of the

policy language, and one for removal of the field and all data contained in that field from ARIN databases. Staff recommends the second be adjusted to two years from adoption rather than a fixed date that may need to adjust as the Draft Policy moves through the PDP.

#### **IMPLEMENTABLE AS WRITTEN?:** Yes

**IMPACT ON ARIN REGISTRY OPERATIONS AND SERVICES:** Involves removal of fields and database objects of significant scope.

**LEGAL REVIEW:** No material legal issue.

**IMPLEMENTATION TIMEFRAME ESTIMATE:** Three months for removal of the policy language. Second timeframe will be followed according to the text, if adopted, but not within fewer than nine months from adoption.

#### **IMPLEMENTATION REQUIREMENTS:**

- Customer education and outreach with appropriate sunsetting lead times
- Staff training
- Updates to public documentation
- Updates to internal procedures and guidelines

#### PROPOSAL/DRAFT POLICY TEXT ASSESSED: 13 September 2022

### **Recommended Draft Policy ARIN-2022-1**

**MDN Clarification for Qualification** 

**STATUS:** Under Discussion **SHEPHERDS:** Chris Woodfield, Brian Jones



Current Text (2 May 2022)

AC ASSESSMENT OF CONFORMANCE WITH THE PRINCIPLES OF INTERNET NUMBER RESOURCE POLICY:

Recommended Draft Policy ARIN-2022-1 conforms to the principles of the ARIN Policy Development Process as follows:

- By providing greater clarity concerning transfer requirements for organizations operating Multiple Discrete Networks (MDNs), it promotes fair and impartial number resource administration;
- It is technically sound because it clarifies the technical requirements for receiving IPv4 resources via transfer if one is an MDN operator; and
- Community support has been demonstrated throughout the process associated with its development.

#### **PROBLEM STATEMENT:**

The requirements for transfers involving companies operating multiple discrete networks under section 8.5 of the NRPM are unclear and need clarification.

#### **POLICY STATEMENT:**

Replace the first paragraph of Section 8.5.7 with the following:

Organizations may qualify for additional IPv4 address blocks by demonstrating 80% utilization of their currently allocated space. In organizations operating multiple discrete networks, each discrete network may be assessed individually for the 80% utilization threshold. To qualify under this policy, the organization must provide justification that each network is discrete, per the criteria described in section 4.5. Each discrete network must meet the projection requirements in section 8.5.6, and each discrete network for which IP addresses are requested must meet the utilization requirements in section 8.5.6. Organizations may receive one or more transfers up to the total size of their current ARIN IPv4 address holdings, up to a maximum size of /16.

#### TIMETABLE FOR IMPLEMENTATION: Any.

#### STAFF AND LEGAL REVIEW (21 MARCH 2022)

**STAFF UNDERSTANDING:** This Draft Policy expands Section 8.5.7: Alternative Additional IPv4 Address Block Criteria to clarify qualification criteria for organizations with Multiple Discrete Networks, specifying that each network must be assessed individually for utilization thresholds. The text codifies current practice, and is clear and understandable.

#### **IMPLEMENTABLE AS WRITTEN?:** Yes

#### IMPACT ON ARIN REGISTRY OPERATIONS AND SERVICES: None

**LEGAL REVIEW:** No material legal issue.

#### IMPLEMENTATION TIMEFRAME ESTIMATE: Three months

#### **IMPLEMENTATION REQUIREMENTS:**

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

PROPOSAL/DRAFT POLICY TEXT ASSESSED: 17 March 2022

Remove Barrier to BGP Uptake in ASN Policy

#### View Policy History on arin.net

**STATUS:** Under Discussion **SHEPHERDS:** Kerrie Richards, Chris Tacit

Current Text (13 September 2022)

#### **PROBLEM STATEMENT:**

The current requirements for getting an ASN have resulted in confusion particularly for new entrants, who have their hands more than full with the mechanics of getting BGP up and running. The availability of 32 bit ASNs provides an opportunity for the removal of unnecessary constraints and processes for the allocation of ASNs.

ARIN does not provide guidance to use RFC1918 space if possible and likewise ARIN should not require the use of private ASNs in preference to public ASNs.

Further Technical Rationale:

Four octet (32 bit) ASNs were defined in May 2007 in RFC 4893. It has taken several years for routing equipment in general use to catch up, but today 32 bit ASNs are generally accepted and it is rare that an organisation which has been issued a 32 bit ASN comes back to ARIN and says they need a 16 bit ASN instead.

The austerity measure of requiring extensive documentation to get an ASN is left over from the days of 16 bit ASNs (total space 65000). It is no longer appropriate and we should align our conservation requirements with those found in other 32-bit spaces (total space four billion).

Consider:

A /32 of IPv6 space is the default allocation and will be assigned to any ISP that requests it.

Temporary assignment of a /32 of IPv4 space can be acquired on most residential ISPs by issuing a DHCP request.

We propose making issuance of the first 32 bit ASN for any ORGID (or each site for organizations that have number resources under multiple discrete networks policy) be pro-forma upon request. If an org's technical people think they need a public ASN, they probably do!

Vetting as embodied in existing policy or evolved in ARIN-2021-3 should be reserved for those requesting more than one ASN per organization or discrete network.

#### **POLICY STATEMENT:**

Replace the entirety of Section 5, which currently reads:

There are a limited number of available Autonomous System Numbers (AS Numbers), therefore, it is important to determine which sites require unique ASNs and which do not. If a unique ASN is not required for a given network design, one or more of the ASN reserved for private use should be utilized. Those numbers are: 64512 through 65534 and 4200000000 through 4294967294 inclusive.

In order to be assigned an ASN, each requesting organization must provide ARIN with verification that it requires a unique routing policy, such as a plan:

To originate announcement of IP Number Resources via an accepted protocol (such as Border Gateway Protocol) from an ASN different than that of its upstream provider;

To multihome a site with one or more Autonomous Systems; or

To use an ASN to interconnect with other Autonomous Systems.

ASNs are issued based on current need, as set out in this section 5.

With the following new Section 5:

Any organization may be issued a single Autonomous System Number (ASN) upon request. Organizations that have space issued under Multiple Discrete Networks policy may be issued one ASN per discrete network upon request.

Additional ASN requests should include proof of the requestor's need for a unique routing policy, or other technical justification for the need for more than one ASN.

#### TIMETABLE FOR IMPLEMENTATION: Any.

#### STAFF AND LEGAL REVIEW (16 SEPTEMBER 2022)

**STAFF UNDERSTANDING:** ARIN-2022-2 would rewrite ARIN's Autonomous System Numbers policy, reducing its overall size and specifying single-ASN issuance as the default action.

The text is clear and understandable.

#### **IMPLEMENTABLE AS WRITTEN?:** Yes

**IMPACT ON ARIN REGISTRY OPERATIONS AND SERVICES:** None. The Draft Policy deals with issuance and manually vetted request documentation requirements, which have no significant registry impacts as a result of implementation.

**LEGAL REVIEW:** No material legal issue.

#### **IMPLEMENTATION TIMEFRAME ESTIMATE:** Three months

#### **IMPLEMENTATION REQUIREMENTS:**

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

#### PROPOSAL/DRAFT POLICY TEXT ASSESSED: 13 September 2022

#### Remove Officer Attestation Requirement for 8.5.5

**STATUS:** Under Discussion **SHEPHERDS:** Matthew Wilder, Joe Provo

Current Text (21 June 2022)

#### **PROBLEM STATEMENT:**

Requiring an officer attestation requires unnecessary resources and increases the time to complete an IPv4 transfer.

#### **POLICY STATEMENT:**

8.5.5. Block Size

Organizations may qualify for the transfer of a larger initial block, or an additional block, by providing documentation to ARIN which details the use of at least 50% of the requested IPv4 block size within 24 months.

Removing "An officer of the organization shall attest to the documentation provided to ARIN."

#### TIMETABLE FOR IMPLEMENTATION: Immediate.

#### **COMMENTS:**

- This is the only remaining mention outside Section 9 (which makes good use of the restrictions it has).
- Due to the cost of IPv4 at this time it is safe to say that someone of authority is aware of this transaction without having them provide an attestation.

#### STAFF AND LEGAL REVIEW (15 AUGUST 2022)

**STAFF UNDERSTANDING:** ARIN-2022-3 would remove the officer attestation requirement for organizations qualifying for initial transfers larger than a /24 (ARIN's present minimum IPv4 transfer size) or additional transfers. For reference, this requirement became part of the NRPM Section 8 in February 2017 (https://www.arin.net/vault/policy/archive/nrpm\_20170221.pdf) and is not currently in IP address or ASN allocation policy. The requirement was removed from operational practice for IP address and ASN allocation requests via Consultation 2021.04 Retiring the Officer Attestation Requirement (https://www.arin.net/participate/community/acsp/consultations/2021/2021-4/).

The policy text is clear and understandable.

#### **IMPLEMENTABLE AS WRITTEN?:** Yes

**IMPACT ON ARIN REGISTRY OPERATIONS AND SERVICES:** Minor updates within ARIN Online will need to be made to remove attestation language.

**LEGAL REVIEW:** No material legal issue. Removal of the officer attestation would not materially impact ARIN's ability to pursue cases of fraud.

#### **IMPLEMENTATION TIMEFRAME ESTIMATE:** Six months

#### **IMPLEMENTATION REQUIREMENTS:**

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

#### PROPOSAL/DRAFT POLICY TEXT ASSESSED: 21 June 2022

Clean-up of NRPM Section 2.11

**STATUS:** Under Discussion **SHEPHERDS:** Alyssa Quinn, Alison Wood

Current Text (26 July 2022)

#### **PROBLEM STATEMENT:**

This proposal continues the work that the ARIN AC NRPM Clean–up Working Group undertook to conduct an editorial review of the NRPM. It relates specifically to Section 2.11. The focus of this proposal is to ensure that the intended meaning of the text is clear.

#### **POLICY STATEMENT:**

Change the text "A community network is deployed, operated and governed by its users" to "A community network is one that is deployed, operated and governed by its users" in the first line and change the text "to the user community it services" to "to the community it services" in the second line.

#### TIMETABLE FOR IMPLEMENTATION: Immediate.

#### **COMMENTS:**

This proposal is intended to replace Prop-305 in part. Although the proposal was drafted in the course of an editorial review of Section 2.11, some of the changes proposed may not be considered purely editorial in nature and so this proposal is not being presented as strictly editorial.

#### Streamlining Section 11 Policy Language

#### View Policy History on arin.net

**STATUS:** Under Discussion **SHEPHERDS:** Chris Tacit, Andrew Dul

Current Text (19 September 2022)

#### **PROBLEM STATEMENT:**

Section 11 of the NRPM contains a great deal of language that is either explicitly not policy, or is not impactful on ARIN's administration of Internet number resources for experimental allocations, or to the customers requesting said resources. A revision to transform Section 11 into a collection of policies for experimental allocations serves to make the Section more easily digested by the reader, and a more functional reference for customers and ARIN staff during experimental allocation requests.

#### **POLICY STATEMENT:**

Section 11 Overview

*Current text:* 

11. Experimental Internet Resource Allocations

ARIN will allocate Numbering Resources to entities requiring temporary Numbering Resources for a fixed period of time under the terms of recognized experimental activity.

"Numbering Resources" refers to unicast IPv4 or IPv6 address space and Autonomous System numbers. The following are the criteria for this policy:

Proposed text:

11. Experimental Internet Resource Allocations

ARIN will allocate Number Resources to organizations requiring temporary Number Resources for a fixed period of time under the terms of a recognized experimental activity.

Section 11.1

Current text:

11.1. Documentation of Recognized Experimental Activity

A Recognized Experimental Activity is one where the experiment's objectives and practices are described in a publicly accessible document. It is a normal requirement that a Recognized Experimental Activity also includes the undertaking that the experiment's outcomes be published in a publicly accessible document at the end of the experiment. The conditions for determining the end of the experiment are to be included in the document. Applicants for an experimental allocation are expected to demonstrate an understanding that when the experiment ends, the allocation will be returned; a successful experiment may need a new allocation under normal policies in order to continue in production or commercial use, but will not retain the experimental allocation. A "publicly accessible document" is a document that is publicly and openly available free of charges and free of any constraints of disclosure.

ARIN will not recognize an experimental activity under this policy if the entire research experiment cannot be publicly disclosed.

ARIN has a strong preference for the recognition of experimental activity documentation in the form of a document which has been approved for publication by the IESG or by a similar mechanism as implemented by the IETF.

Proposed text:

11.1. Eligibility Criteria for Recognized Experimental Activity

The eligibility criteria for a recognized experimental activity under this policy are:

The experiment's description and objectives are published in a publicly accessible document, which for the purpose of this policy means that the document is readily available free of charges to the public, and free of any constraints of disclosure within one year after the end of the experiment;

The experiment's outcomes must also be published in a publicly accessible policy;

Demonstration to ARIN that the experimental activity is technically sound within the meaning of ARIN's Policy Development Process;

Demonstration to ARIN that the experimental activity is technically coordinated in that consideration of any potential negative impact of the proposed experiment on the operation of the Internet and its deployed services has been considered, and a description of experimenter mitigation plans to contain any negative impacts has been provided.

Retire Sections 11.2 and 11.3

Section 11.4

Current text:

11.4. Resource Allocation Term and Renewal

The Numbering Resources are allocated for a period of one year. The allocation can be renewed on application to ARIN providing information as per Detail One. The identity and details of the applicant and the allocated Numbering Resources will be published under the conditions of ARIN's normal publication policy. At the end of the experiment, resources allocated under this policy will be returned to the available pool.

Proposed text:

11.4. Resource Allocation Term and Renewal

The Number Resources are allocated for a period of one year under this policy. The allocation can be renewed on application to ARIN by providing information as to why an extension is necessary for a successful experiment. The resources allocated under this policy must be returned to ARIN as soon as the recognized experimental activity has ended.

Section 11.5

Current text:

11.5. Single Resource Allocation per Experiment

ARIN will make one-off allocations only, on an annual basis to any applicant. Additional allocations to an organization already holding experimental activity resources relating to the specified activity outside the annual cycle will not be made unless justified by a subsequent complete application.

It's important for the requesting organization to ensure they have sufficient resources requested as part of their initial application for the proposed experimental use.

Proposed text:

11.5. Single Resource Allocation per Recognized Experimental Activity

ARIN will make only one allocation per recognized experimental activity. An allocation may consist of multiple Number Resources if required for the conduct of the recognized experimental activity. Additional allocations to an organization already holding experimental Number Resources will not be made under this policy unless justified by a subsequent complete application relating to a different experimental activity.

Retire Section 11.6

Section 11.7

Current text:

#### 11.7. Resource Allocation Guidelines

The Numbering Resources requested come from the global Internet Resource space, do not overlap currently assigned space, and are not from private or other non-routable Internet Resource space. The allocation size shall be consistent with the existing ARIN minimum allocation sizes, unless smaller allocations are intended to be explicitly part of the experiment. If an organization requires more resources than stipulated by the minimum allocation size in force at the time of its request, the request must clearly describe and justify why a larger allocation is required. All research allocations must be registered publicly in whois. Each research allocation will be designated as a research allocation with a comment indicating when the allocation will end.

Proposed text:

#### 11.7. Resource Allocation Guidelines

The Number Resources requested shall come from the global Number Resource space, shall not overlap any currently assigned space, and shall not be from private or other non-routable Number Resource space. The allocation size shall be consistent with the existing ARIN minimum allocation sizes, unless smaller allocations are explicitly required due to the nature of the experiment. If an organization requires more resources than stipulated by the minimum allocation size in force at the time of its request, the request must clearly describe and justify why a larger allocation is required. All research allocations must be registered publicly in ARIN's directory services. Each research allocation will be designated as a research allocation with a comment indicating when the allocation will end.

Section 11.8

Current text:

11.8. Commercial Use Prohibited

If there is any evidence that the temporary resource is being used for commercial purposes, or is being used for any activities not documented in the original experiment description provided to ARIN, ARIN reserves the right to immediately withdraw the resource and reassign it to the free pool.

Proposed text:

11.8. Commercial Use Prohibited

If there is any evidence that the temporary resource is being used for commercial purposes or is being used for any activities not documented in the original experiment description provided to ARIN, ARIN reserves the right to immediately withdraw the resource.

Retire Section 11.9

TIMETABLE FOR IMPLEMENTATION: Immediate.

#### **Leasing Not Intended**

#### View Policy History on arin.net

**STATUS:** Under Discussion **SHEPHERDS:** Joe Provo, Brian Jones

Current Text (23 August 2022)

#### **PROBLEM STATEMENT:**

"IPv6 Policy (section 6.4.1.) explicitly mention that address space is not a property. This is also stated in the RSA (section 7.) for all the Internet Number Resources.

However, with the spirit of the IPv4 allocation policies being the same, there is not an equivalent text for IPv4, neither for ASNs.

Further to that, policies for IPv4 and IPv6 allocations, clearly state that allocations are based on justified need and not solely on a predicted customer base. Similar text can be found in the section related to Transfers (8.1).

Consequently, resources not only aren't a property, but also, aren't allocated for leasing purposes, only for justified need of the resource holder and its directly connected customers.

Therefore, and so that there are no doubts about it, it should be made explicit in the NRPM that the Internet Resources should not be leased "per se", but only as part of a direct connectivity service. At the same time, section 6.4.1. should be moved to the top of the NRPM (possibly to section 1. "Principles and Goals of the American Registry for Internet Numbers (ARIN)"."

#### **POLICY STATEMENT:**

Actual Text (to be replaced by New Text):

6.4.1. Address Space Not to be Considered Property

It is contrary to the goals of this document and is not in the interests of the Internet community as a whole for address space to be considered freehold property.

The policies in this document are based upon the understanding that globally-unique IPv6 unicast address space is allocated/assigned for use rather than owned.

New Text

1.5. Internet Number Resources Not to be Considered Property

It is contrary to the goals of this document and is not in the interests of the Internet community as a whole for address space to be considered freehold property.

The policies in this document are based upon the understanding that Internet Number Resources are allocated/assigned for use rather than owned.

ARIN allocate and assign Internet resources in a delegation scheme, with an annual validity, renewable as long as the requirements specified by the policies in force at the time of renewal are met, and especially the justification of the need.

Therefore, the resources can't be considered property.

The justification of the need, generically in the case of addresses, implies their need to directly connect customers. Therefore, the leasing of addresses is not considered acceptable, nor does it justify the need, if they are not part of a set of services based, at least, on direct connectivity.

Even in cases of networks not connected to the Internet, the leasing of addresses is not admissible, since said sites can request direct assignments from ARIN and even in the case of IPv4, use private addresses or arrange transfers.

#### TIMETABLE FOR IMPLEMENTATION: Immediate

#### SITUATION IN OTHER REGIONS:

In other RIRs, the leasing of addresses is not authorized either and since it is not explicit in their policy manuals either, this proposal will be presented as well.

Nothing is currently mentioned in RIPE about this and it is not acceptable as a justification of the need. In AFRINIC, APNIC and LACNIC, the staff has confirmed that address leasing is not considered as valid for the justification.

#### Clean-up of NRPM – Introduction of Sections 2.17 and 2.18

**STATUS:** Under Discussion **SHEPHERDS:** Alison Wood, Chris Woodfield

Current Text (28 September 2022)

#### **PROBLEM STATEMENT:**

Although the term "IANA" appears throughout Section 10 of the NRPM, there is no reference to any definition of the term. This proposal defines the term with reference to appropriate ICANN documentation.

The term Internet Number Resources is referenced in several sections of the NRPM but is not defined.

#### **POLICY STATEMENT:**

2.17 Internet Assigned Numbers Authority (IANA) Internet Assigned Numbers Authority (IANA) refers to a set of functions which includes the global coordination of Internet number resources.

2.18 Internet Number Resources Internet number resources are the unique identifiers allocated by IANA and issued by the RIRs. This includes Internet Protocol (IP) addresses (IPv4 and IPv6) and Autonomous System Numbers (ASNs).

#### TIMETABLE FOR IMPLEMENTATION: Immediate

**COMMENTS:** Although this proposal was drafted in the course of an editorial review of Section 2 of the NRPM, the addition of a new definition may not be considered purely editorial in nature and so this proposal is not being presented as strictly editorial.

View Policy History on arin.net

Direct Assignment Language Update

#### View Policy History on arin.net

**STATUS:** Under Discussion **SHEPHERDS:** Rob Seastrom, Leif Sawyer

Current Text (23 August 2022)

#### **PROBLEM STATEMENT:**

As a result of ARIN's fee harmonization direct assignment are no longer being utilized within ARIN databases therefore language around that has been deprecated and should be modernized.

#### **POLICY STATEMENT:**

Section 3.6.3: Remove "direct allocation" from "This policy applies to every Organization that has a direct assignment, direct allocation, or AS number from ARIN (or one of its predecessor registries) or a reallocation from an upstream ISP."

Section 4.2.2, paragraph 1: change "direct assignments or allocations" to "ARIN-issued IPv4 addresses"

Section 4.2.2, paragraph 2: change "direct allocations, direct assignments, re-allocations or reassignments" to "ARIN-issued IPv4 addresses, re-allocations or reassignments"

Section 4.3.2: change "direct assignments or allocations" to "ARIN-issued IPv4 addresses"

Section 6.5.8: change "Direct Assignments from ARIN to End-user Organizations" to "End-user Allocations"

Section 8.5.4: change "direct assignments or allocations" to "ARIN-issued IPv4 addresses"

Section 8.5.6: change "direct assignments or allocations" to "ARIN-issued IPv4 addresses"

TIMETABLE FOR IMPLEMENTATION: Immediate

Clean-up of NRPM Section 2.10

#### View Policy History on arin.net

**STATUS:** Under Discussion **SHEPHERDS:** Chris Woodfield, Alicia Trotman

Current Text (23 August 2022)

#### **PROBLEM STATEMENT:**

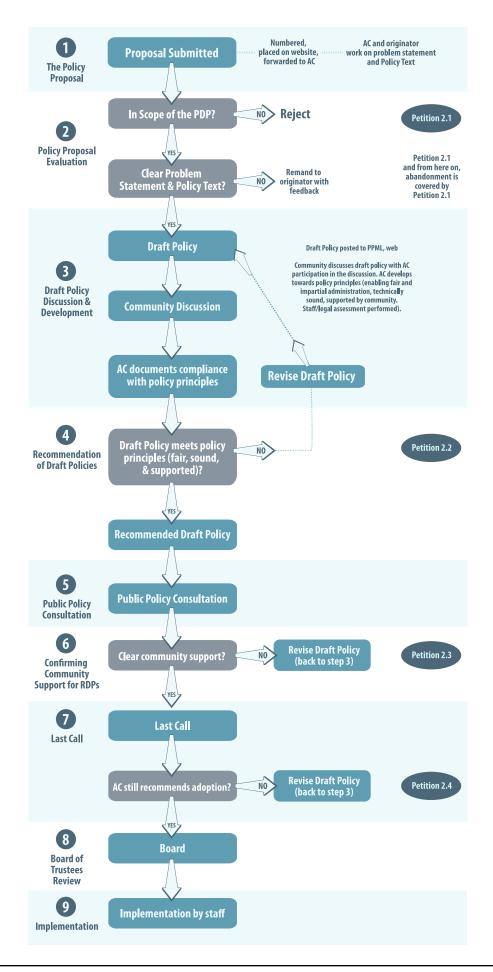
This proposal continues the work that the ARIN AC NRPM Clean–up Working Group undertook to conduct an editorial review of the NRPM. It relates specifically to Section 2.10. The focus of this proposal is to both clarify and simplify the wording of the section.

#### **POLICY STATEMENT:**

Replace the existing text: "The term End Site shall mean a single structure or service delivery address, or, in the case of a multi-tenant structure, a single tenant within said structure (a single customer location)." With the new text: "An End Point is the smallest non-divisible physical or virtual point in a network requiring IPv6 address space."

#### TIMETABLE FOR IMPLEMENTATION: Immediate

**COMMENTS:** This proposal is intended to replace ARIN-prop-305 in part, but is not considered strictly editorial in nature.



# ARIN's Policy Development Process (PDP)

This version of the ARIN Policy Development Process was published on 14 January 2013. It supersedes the previous version.

#### PART ONE – ARIN POLICY DEVELOPMENT PROCESS GOALS

#### 1. Purpose

This document describes the ARIN Policy Development Process (PDP). The ARIN PDP is the process by which policies for the management of Internet number resources in the ARIN region are developed by the community. These Internet number resource policies are developed in an open, transparent, and inclusive manner that allows anyone to participate in the process.

The Policy Development Process encourages community participation, including allowing anyone to submit proposals for changes to number resource policy. The PDP is designed to bring forth clear, technically sound and useful policies for ARIN to use in the management and administration of Internet number resources. To accomplish this goal, the PDP charges the member-elected ARIN Advisory Council (AC) as the primary facilitators of the policy development process with appropriate checks and balances on its performance in that role.

Part One of this document provides the underlying goals for the Policy Development Process (including its purpose, scope, principles, and criteria for policy changes) and Part Two details the specific Policy Development Process used for development of changes to Internet number resource policy. Part Three details the processes for petitioning specific aspects of the Policy Development Process.

#### 2. Definitions

#### **Internet Number Resources**

Internet number resources consist of Internet Protocol version 4 (IPv4) address space, Internet Protocol version 6 (IPv6) address space, and Autonomous System (AS) numbers.

#### **Policy Proposal**

An idea for a policy that is submitted to the Policy Development Process. Members of the ARIN Advisory Council and ARIN staff work with the originator to refine the Policy Proposal so that it contains a clear statement of the existing problem with Internet number resource policy and suggested changes to Internet number resource policy text to address the problem. In cooperation with ARIN staff, the Advisory Council also confirms each Policy Proposal is within scope (per Section 3) of the PDP.

#### **Draft Policy**

A Policy Proposal that is complete and in scope for the PDP is accepted by the Advisory Council and becomes a Draft Policy.

The Advisory Council further develops the Draft Policy, working in cooperation with the policy originator if available. A Draft Policy, once fully developed, consists of a clear problem statement, proposed changes to number resource policy text, and an assessment of the conformance of the Draft Policy to ARIN's Principles of Internet Number Resource Policy (as specified in Part One, Section 4 of the PDP).

#### **Recommended Draft Policy**

A Recommended Draft Policy is the

result of a Draft Policy being fully developed (containing clear problem statement, proposed changes to policy text, and an assessment of conformance to the PDP principles) and then being recommended for adoption by action of the ARIN Advisory Council. A Draft Policy becomes a Recommended Draft Policy once the Advisory Council believes with a high likelihood that the Draft Policy satisfies ARIN's Principles of Internet Number Resource Policy. **Recommended Draft Policies must** undergo community consultation and a "Last Call" period before being considered for adoption.

#### **Adopted Policy**

A policy that has been adopted by the ARIN Board of Trustees. Adopted Policies are incorporated into ARIN's Number Resource Policy Manual (NRPM) as of their effective date.

#### **Public Policy Mailing List (PPML)**

The ARIN public mailing list for discussion of Internet number resource policy.

#### **Public Policy Consultation (PPC)**

An open public discussion held by ARIN of Internet number resource policy that provides for the contemporaneous interaction and polling of in-person and remote participants. These consultations may be held at ARIN's Public Policy Meetings and at other related forums as approved by the ARIN Board of Trustees.

#### **Public Policy Meeting (PPM)**

A public forum held periodically by ARIN that includes Public Policy Consultations of all Draft and Recommended Draft Policies. Public Policy Meetings are held at least annually, although Public Policy Consultations for selected Draft or Recommended Draft Policies may be held in between Public Policy Meetings in similar open forums.

#### Petition

An action initiated by any member of the community (including a proposal originator) if they are dissatisfied with the action taken by the Advisory Council regarding a specific Policy Proposal, Draft Policy or Recommended Draft Policy.

### 3. Scope of Internet Number Resource Policies

3.1. Policies, not Processes, Fees, or Services

Internet number resource policies developed through the PDP describe the policies and guidelines to be followed in number resource management, not the procedures that ARIN staff will use to implement the policies. ARIN staff develops appropriate procedures to implement policies after they are adopted.

Internet number resource policies are also distinctly separate from ARIN general business practices. ARIN's general business processes, fees, and services are not within the purview of the Policy Development Process, and while policies developed through the PDP may apply to ARIN's service offering, they cannot define or establish ARIN fees or service offerings. All matters concerning fees and service offerings are part of the fiduciary responsibility of the Board of Trustees. Note that the ARIN **Consultation and Suggestion** Process (ARIN ACSP) may be used to propose changes in nonpolicy areas.

Changes to policy that are purely editorial and non-substantial in nature are outside the scope of the full Policy Development Process and may only be made with 30 days public notice followed by the concurrence of both the ARIN Advisory Council and ARIN Board of Trustees that the changes are non-substantial in nature.

### 3.2. Relevant and Applicable within the ARIN Region

Policies developed through the PDP are community selfregulatory statements that govern ARIN's actions in the management of Internet number resources. Policy statements must be applicable to some portion of the community for number resources managed within the ARIN region, and proposals to change policy must address a clearly defined, existing or potential problem with number resource policy in the region.

Note that the Policy Development Process for global policies follows a similar process within each RIR region with the additional process of ratification by the Internet Corporation for Assigned Names and Numbers (ICANN). The Global **Policy Development Process** is separately documented and facilitated by the Address Supporting Organization Address Council (ASO AC), and in these circumstances, the ARIN PDP is also used in the development of number resource policies with global applicability.

### **4.** Principles of Internet Number Resource Policy

Internet number resource policy

must satisfy three important principles, specifically: 1) enabling fair and impartial number resource administration, 2) technically sound (providing for uniqueness and usability of number resources), and 3) supported by the community.

### 4.1. Enabling Fair and Impartial Number Resource Administration

Internet number resources must be managed with appropriate stewardship and care. Internet number resource policy must provide for fair and impartial management of resources according to unambiguous guidelines and criteria. All policy statements must be clear, complete, and concise, and any criteria that are defined in policy must be simple and obtainable. Policy statements must be unambiguous and not subject to varying degrees of interpretation.

#### 4.2. Technically Sound

Policies for Internet number resource management must be evaluated for soundness against three overarching technical requirements: conservation, aggregation, and registration. More specifically, policies for managing Internet number resources must:

- Support both conservation and efficient utilization of Internet number resources to the extent feasible. Policy should maximize number resource availability to parties with operational need.
- Support the aggregation of Internet number resources in a hierarchical manner to the extent feasible. Policy should permit the

routing scalability that is necessary for continued Internet growth. (Note that neither ARIN, nor its policies, can guarantee routability of any particular Internet number resource as that is dependent on the actions of the individual Internet operators.)

 Support the unique registration of Internet number resources.
Policy should prevent to the extent feasible any unknown or duplicate use of Internet number resources that could disrupt Internet communications.

Policies must achieve a technically sound balance of these requirements, and support for these technical requirements must be documented in the assessment of the policy change.

#### **4.3.** Supported by the Community

Changes to policy must be shown to have a strong level of support in the community in order to be adopted. The determination of support for the policy change is done by polling the community for support during a Public Policy Consultation (PPC).

The Policy Development Process, as a consensus-based collaborative development process, encourages incorporation of feedback received from participants where possible with the goal of increasing community support for policy changes.

A strong level of community support for a policy change does not mean unanimous; it may be demonstrated by a subset of the community, as long as the policy change enjoys substantially more support than opposition in the community active in the discussion.

### **5. ARIN Board of Trustees Criteria** for Policy Changes

In order to maintain fidelity to the duty performed by ARIN on behalf of the Internet community, changes to Internet number resource policy must meet two specific criteria before being adopted by the ARIN Board of Trustees: 1) in compliance with law and ARIN's mission, and 2) developed via open and transparent processes.

### 5.1. In Compliance with Law and ARIN's Mission

Policies developed through the PDP must advance ARIN's mission, not create unreasonable fiduciary or liability risk, and must be consistent with ARIN's Articles of Incorporation, Bylaws, and all applicable laws and regulations.

### 5.2. Developed by Open, Transparent, and Inclusive Processes

Changes to policy must be developed via open and transparent processes that provide for participation by all. Policies must be considered in an open, publicly accessible forum as part of the adoption process. Policy discussions in the ARIN region are conducted on the Public Policy Mail List (PPML) and via Public Policy Consultation (PPC). There are no requirements for participation other than adherence to the guidelines of behavior and decorum, and anyone interested in following the process may subscribe to the PPML or may participate without charge in

Public Policy Consultations via in person or remote participation methods.

All aspects of the PDP are documented and publicly available via the ARIN website. The PPML is archived. The proceedings of each PPM are published. All policies are documented in the Number **Resource Policy Manual** (NRPM). All Draft Policies are cross referenced to the original Policy Proposal, the archives of the PPML, all related PPC proceedings, and the minutes of the appropriate Advisory Council and the ARIN Board of Trustees meetings. The procedures that are developed to implement the policy are documented, publicly available, and followed by the ARIN staff.

The Policy Development Process itself may only be changed by the ARIN Board of Trustees after a public consultation period to consider the proposed changes.

#### PART TWO – THE POLICY DEVELOPMENT PROCESS

This section provides the details of the ARIN Policy Development Process. A graphical flow depiction of the process is provided at Appendix A. All references to "days" are calendar days.

All ARIN Advisory Council (AC) decisions on policy matters require an affirmative roll call vote of the majority of the members of the full AC, unless otherwise specified.

#### 1. The Policy Proposal

Policy Proposals may be submitted to the ARIN Policy Development Process (PDP) by anyone in the global Internet community except for members of the ARIN Board of Trustees or the ARIN staff. Policy Proposals may be submitted any time by sending them to policy@arin.net. Upon receipt of a new Policy Proposal, the ARIN staff assigns it a Policy Proposal number, posts the Policy Proposal to the public web site, and notifies the AC of a new Policy Proposal available for consideration. The AC designates one or more members to work with the policy originator as needed. The assigned AC members and ARIN staff will work with the originator as described below to prepare the Policy Proposal for evaluation by the AC.

The assigned members of the AC work with the proposal originator by providing feedback regarding the clarity and understanding of the Policy Proposal. The merits of the Policy Proposal itself are not considered at this time; the Policy Proposal is revised as needed so that it contains a clear statement of the problem with existing Internet number resource policy, that any suggested changes to Internet number resource policy text are understandable to the ARIN staff and community, and to identify and correct any potential scope considerations of the Policy Proposal.

The proposal originator may revise (or not) the Policy Proposal based on the feedback received. Once the originator and assigned members of the AC are satisfied with the scope and clarity of the Policy Proposal, it is evaluated by the AC.

#### 2. Policy Proposal Evaluation

During Policy Proposal evaluation, the Advisory Council does not evaluate the merits of Policy Proposal other than to confirm that the Policy Proposal is within scope of the Policy Development Process and contains a clear statement of the problem and suggested changes to number resource policy text. Upon submission to the AC, each Policy Proposal is evaluated in a timely manner to determine if the Policy Proposal is within scope of the Policy Development Process. Policy Proposals that are determined by the AC to be out of scope (e.g. for not addressing a clearly defined existing or expected problem, or that propose solutions involving other than number resource policy in the region) are rejected at this point, and the AC announces the rejection of a Policy Proposal along with an explanation of its reasoning on the ARIN Public Policy Mailing List (PPML).

The AC also evaluates whether the Policy Proposal contains a clear statement of the existing problem with Internet number resource policy including suggested changes to number resource policy text to address the problem. Once this has been confirmed, the AC accepts it as a Draft Policy for further development work with the community. The AC announces the acceptance of a Policy Proposal as a Draft Policy on the PPML and encourages community discussion of its merits and concerns.

Policy Proposals that are determined by the AC to lack clarity are remanded back to the originator along with an explanation of the areas needing improvements in clarity. The proposal originator revises the Policy Proposal based on the feedback received, and again offers the revised Policy Proposal for evaluation by the AC.

The AC maintains a docket of all Policy Proposals. A submitted Policy Proposal that is not rejected upon evaluation as being out of scope remains on the docket as a Policy Proposal until it is withdrawn by the originator or accepted by the Advisory Council as a Draft Policy. Remanded Policy Proposals that are not revised by the originator within 60 days are deemed abandoned. Policy Proposals that have not been accepted as a Draft Policy after 60 days may be petitioned to Draft Policy status. Refer to PDP Part Three: Petition Process for a list of petitionable policy actions.

### 3. Draft Policy Discussion and Development

The Advisory Council is responsible for the development of policies to meet ARIN's Principles of Internet Number Resource Policy (as described in Part One, Section 4). The Advisory Council maintains a docket of all Draft Policies.

As part of the policy development effort, the AC participates in and encourages the discussion of the Draft Policies on the PPML, notes the merits and concerns raised, and then based on its understanding of the relevant issues, the Advisory Council may take various actions including abandoning, revising or merging the Draft Policy with other Draft Policies. To the extent that the policy originators are available and responsive, the AC includes them in the revision process.

The AC may submit a Draft Policy at any time for a combined staff and legal review (and should do so after significant revisions to a Draft Policy). This review will be completed within 14 days. Upon receipt of the staff and legal review comments, the AC examines the comments to ensure their understanding and resolve any issues that may have been raised.

The AC announces any actions taken on Draft Policies along with an explanation of its reasoning on the PPML.

#### 4. Recommendation of Draft Policies

The Advisory Council develops and refines Draft Policies until they are satisfied that the Draft Policy meets ARIN's Principles of Internet Number Resource Policy (Part One, Section 4). Specifically, these principles are:

• Enabling Fair and Impartial Number Resource Administration

- Technically Sound
- Supported by the Community

Guided by the discussion of the Draft Policy on the PPML, Public Policy Consultations with the community (if any) and its best judgment, the AC assesses the conformance of each Draft Policy to these principles and documents the result in an assessment section within the Draft Policy. Any specific concerns expressed by a significant portion of the community must be explicitly noted and addressed in the assessment of the policy change.

Once a Draft Policy is fully developed and the AC is satisfied that it meets the principles of Internet number resource policy (including the support of the community based on online discussion that has occurred thus far), the AC recommends the Draft Policy for adoption. Recommended Draft Policies must undergo Public Policy Consultation with the community before proceeding to Last Call and being sent for consideration by the ARIN Board of Trustees.

### 5. Community Consultation and Public Policy Meetings

ARIN holds periodic Public Policy Meetings (PPM) where the Advisory Council reports on the status of all Draft Policies and Recommended Draft Policies on its docket for discussion and feedback from the community. The presentation and discussion is referred to as a "Public Policy Consultation." Recommended Draft Policies may not be changed in the 30 days prior to its Public Policy Consultation.

As each Draft and Recommended Draft Policy is presented for Public Policy Consultation, members of the AC will provide the arguments for and against adoption (petitioned items are handled per PDP Part Three: Petition Process). The AC participates in the discussion during the Public Policy Consultation, and notes significant merits and concerns that were raised in the discussion for inclusion in the policy assessment. Based on the feedback received and its best judgment, the AC revises the Draft Policy to address concerns raised where it will improve the overall community support for the policy change.

Within the 60 days following a Public Policy Consultation on a Recommended Draft Policy, the AC reviews the result of the discussion (including any polls of support) and decides the appropriate next action.

### 6. Confirming Community Support for Recommended Draft Policies

The Advisory Council confirms community support for Recommended Draft Policies, and this is done by polling community support for the policy change during a Public Policy Consultation.

The AC should carefully weigh the community support shown for a Recommended Draft Policy. Absence of clear community support is a strong indication that policy abandonment should be considered. A low level of overall support without opposition for a Recommended Draft Policy suggests further discussion of the merits of the policy change or abandonment. A clear split in the community support suggests that the AC should revise the Recommended Draft Policy to accommodate the concerns raised or further explain its consideration of the matter.

A Recommended Draft Policy that has demonstrated clear support (and only relatively low opposition for well– understood reasons) may be advanced to Last Call by the AC within 60 days of its Public Policy Consultation.

All Recommended Draft Policies not advanced to Last Call within 60 days of completion of their Public Policy Consultation will revert to Draft Policy status.

#### 7. Last Call

The Advisory Council advances Recommended Draft Policies with clear support to Last Call. Last Call provides an opportunity for final review by the community via discussion on the PPML. The last call period will be for a minimum of 14 days. The AC may decide that certain Recommended Draft Policies require a longer last call period of review (such as those that were revised based on comments received during Public Policy Consultation). If the AC sends a Recommended Draft Policy different than the Recommended Draft Policy presented during the Public Policy Consultation, then the Advisory Council will provide a detailed explanation for all changes to the text and these specific changes must have been discussed during the community consultation.

The AC will review the results of the Last Call discussion, and will determine if they still recommend adoption by the ARIN Board of Trustees. The AC may make minor editorial changes to a Recommended Draft Policy and reissue it for Last Call. No other changes may be made while the policy is in Last Call.

A Recommended Draft Policy that has undergone a successful Last Call discussion may be sent to the ARIN Board of Trustees for adoption consideration. Decisions to send Recommended Draft Policies to the ARIN Board shall be made by the affirmative roll call vote of the two thirds of the members of the full Advisory Council. The results of the AC's decisions, and the reasons for them, are announced on the PPML.

All recommended policies not sent to the ARIN Board of Trustees for consideration within 60 days of Last Call completion will revert to Draft Policy status.

#### 8. Board of Trustees Review

The ARIN Board of Trustees evaluates a Recommended Draft Policy for adoption once it is received from the Advisory Council. In its review, the Board of Trustees evaluates the policy with respect to the Policy Development Goals of the PDP including specifically whether the ARIN Policy Development Process has been followed, and whether the policy is in compliance with law and ARIN's mission.

The Board of Trustees may adopt, reject or remand Recommended Draft Policies to the AC. All rejections will include an explanation. Remands will explain the need for further development. The Board of Trustees may also seek clarification from the AC without remanding the recommended policy. The results of the Board of Trustees' decision are announced on the ARIN Public Policy Mailing List (PPML).

#### 9. Implementation

The projected implementation date of the policy is announced at the time that adoption of the policy is announced. ARIN staff implements the policy and publishes an updated Number Resource Policy Manual (NRPM) that incorporates the adopted policy and which is identified by a new version number.

#### **10. Special Policy Actions**

#### 10.1 Emergency PDP

If urgently necessary pursuant to ARIN's mission, the Board of Trustees may initiate policy by declaring an emergency and posting a Recommended Draft Policy on the PPML for discussion for a minimum of 14 days. The Advisory Council will review the Recommended Draft Policy within 7 days of the end of the discussion period and make a recommendation to the Board of Trustees. If the Board of Trustees adopts the policy, it will be presented at the next Public Policy Meeting for reconsideration.

#### **10.2 Policy Suspension**

If, after a policy has been adopted, the Board receives credible information that a policy is flawed in such a way that it may cause significant problems if it continues to be followed, the Board of Trustees may suspend the policy and request a recommendation from the AC on how to proceed. The recommendation of the AC will be published for discussion on the PPML for a period of at least 14 days. The Board of Trustees will review the AC's recommendation and the PPML discussion. If suspended, the policy will be presented at the next scheduled Public Policy Meeting in accordance with the procedures outlined in this document.

#### **PART THREE – PDP PETITION PROCESS**

This section provides the details of the petitions within the Policy Development Process. Petitions can be made at points where decisions are made in the policy process. Points where petitions are available are depicted on the main PDP flow diagram in Appendix A. All "days" in the process below are calendar days.

#### **1. Petition Principles**

#### 1.1. Available to the community

Any member of the community may initiate a petition if they are dissatisfied with a specific action taken by the ARIN Advisory Council (AC) regarding a Policy Proposal, Draft Policy or Recommended Draft Policy. The petitioner does not have to be located in the ARIN region or associated with an organization that is a Member of ARIN; any party (including a Policy Proposal originator) with interest in policy development matters within the ARIN region may initiate a petition.

Notwithstanding the above, ARIN Staff and ARIN Board of Trustees members may not initiate or be counted in support of petitions as these individuals already have a formally defined role in the Policy Development Process.

#### 1.2. Petition Initiation and Process

A petition may be initiated by sending an email message to the ARIN Public Policy Mailing List (PPML) clearly requesting a petition against a specific action as listed below and including a statement to the community on why the petition is warranted. ARIN Staff will confirm the validity of the petition and then announce the start of the petition period on the PPML mailing list.

Until the close of the petition period, members of the community (as allowed to petition per 1.1 above) may be counted in support for an existing petition by sending an email message to the PPML clearly stating their support for the petition. Only one petition will be considered for a given policy action; all subsequent requests to petition for the same action within the petition period shall be considered as support for the original petition.

The petition shall remain open

for 5 days, at which time the ARIN Staff shall determine if the petition succeeds (a successful petition requires expressions of petition support from at least 10 different people from 10 different organizations unless otherwise specified.) A successful petition will result in a change of status for the Policy Proposal or Draft Policy as specified below.

Staff and legal reviews will be conducted and published for Draft Policies that result from successful petitions.

Successfully petitioned Draft Policies are presented for community consideration at the next Public Policy Meeting (or at an earlier scheduled Public Policy Consultation if desired) by an individual chosen by the petition supporters, with preference given to the proposal originator. If consensus is not achieved in determining the presenter, then the President may facilitate the selection process.

#### 2. Valid Petitions

Petitions may be made regarding specific actions against Policy Proposals, Draft Policies, and Recommended Draft Policies as described below.

### 2.1. Petition against Abandonment, Delay, or Rejection due to Scope

The Advisory Council's decision to abandon a Policy Proposal, Draft Policy or Recommended Draft Policy may be petitioned.

Petitions may be initiated within the 5 days following the announcement date of an Advisory Council abandonment of a specific Policy Proposal or any Draft Policy. For sake of clarity, the "announcement date" of an action shall be the publication date of the action in the ARIN AC draft minutes. Additionally, Policy Proposals that have not been accepted as a Draft Policy after 60 days may also be petitioned to Draft Policy status at anytime.

For a Policy Proposal that has been rejected due to being out of scope of the PDP, a successful petition will refer the question of whether the Policy Proposal is in scope to the ARIN Board of Trustees for consideration.

For all other petitions against abandonment or delay, a successful petition will result in the Draft Policy being placed back on the Advisory Council docket under control of the petitioner and scheduled for public policy consultation at the next PPM. After the public consultation, control returns to the Advisory Council and subsequently may be revised or abandoned per the normal Policy Development Process.

### 2.2. Petition for Recommended Status

Any member of the community may initiate a Petition for Recommended Status if they believe that a Draft Policy (either the original version as proposed or the current version) is fully developed to meet the requirements of Recommended Draft Policy, and the Advisory Council has not advanced the Draft Policy to Recommended Draft Policy status after 90 days as a Draft Policy.

A successful petition for Recommended Status requires expressions of petition support

from at least 15 different people from 15 different organizations. If successful, the petition will result in the Draft Policy being put under control of the petitioner, advanced to Recommended Draft status, and scheduled for public policy consultation at the next PPM. The resulting Recommended Draft Policy shall be under control of the Advisory Council after the public policy consultation and subsequently may be revised or abandoned per the normal Policy Development Process.

#### 2.3. Petition for Last Call

Any member of the community may initiate a Last Call Petition if they are dissatisfied with the Advisory Council's failure to act within the allotted time (60 days) to advance a Recommended Draft Policy as presented during public policy consultation to last call. A successful Petition for Last Call requires expressions of petition support from at least 20 different people from 20 different organizations. If successful, the petition will move the Recommended Draft Policy as presented during its Public Policy Consultation to last call discussion and review by the community on the PPML. The Recommended Draft Policy shall be under the control of the Advisory Council after Last Call.

### 2.4. Petition for Board of Trustees Consideration

Any member of the community may initiate a Board of Trustees Consideration Petition if they are dissatisfied with the Advisory Council's failure to act within the allotted time (60 days) to send a Recommended Draft Policy in last call to the Board of Trustees for consideration. A successful petition for Board of Trustees Consideration requires expressions of petition support from at least 25 different people from 25 different organizations. If successful, this petition will send the Recommended Draft Policy from last call to the Board of Trustees for consideration.



# Thank you for attending ARIN 50.