



# Draft Policy ARIN-2015-2

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Modify 8.4 (Inter-RIR Transfers to Specified Recipients)

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# Problem Statement



- Organizations that obtain a 24 month supply of IP addresses via the transfer market and then have an unexpected change in business plan are unable to move IP addresses to the proper RIR within the first 12 months of receipt.

# Current Policy Statement



- Current Text of fourth bullet of 8.4 reads:  
  
“Source entities within the ARIN region 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 M&A transfers.” (Emphasis added.)

# Proposed Policy Statement



- Current Text of fourth bullet of 8.4 to be changed to read:

“Source entities within the ARIN region must not have received **an 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 M&A transfers.” (Emphasis added.)

# Comments



- The proposal would allow organizations to perform inter-RIR transfers of space received via an 8.3 transfer regardless of the date transferred to ARIN . An example would be if an organization in the ARIN region acquires a block via transfer, and then 3 months later, the organization determines that it wants to launch new services out of region. Under current policy, the organization is prohibited from moving some or all of those addresses to that region's Whois; the numbers are locked in ARIN's Whois.

# Comments (continued)



- It's important to note that 8.3 transfers are approved for a 24 month supply, and, on occasion, a business model may change within the first 12 months after approval. In addition this will not affect the assignments and allocations issued by ARIN they will still be subject to the 12 month restriction.

# Discussion



- There has been a lot of discussion on PPML.
- There is some targeted opposition on the basis that this issue “is not ARIN’s problem” and resources can be requested from another region instead.
- Responses have stressed that ARIN members operating global networks prefer to deal with one RIR as much as possible and this policy would reduce incentives to game the system by using 8.2 and then 8.4 which just creates unnecessary cost and work.

# Discussion (continued)



- One additional proposal is to insert language requiring the transfer to occur to the same entity out of region, but that would not prevent a subsequent transfer to an external party.
- In order for the transferor/initial transferee not to be allowed to make a subsequent transfer to an external party for at least 12 months the other RIR would also have to have a policy to that effect.
- Is globally (or bi-laterally) coordinated policy required?

# Discussion (continued)



- There has been a lot of discussion about the relationship between this proposal, transfer policies and registry accuracy.
- We are seeking community views of this proposal to inform the AC's decision on next steps.