

## Recommended Draft Policy ARIN-2015-7: Simplified requirements for demonstrated need for IPv4 transfers

**Staff Introduction** 

#### **2015-7 History**



- Proposed in June 2015 (ARIN-prop-221)
- AC Shepherds: Robert Seastrom, Milton Mueller
- Presented at:
  - 2 Public Policy Meetings
  - 1 Public Policy Consultation
- Revised: June 2016
- Recommended for adoption: September 2016
- Text in Discussion Guide and at:
  - https://www.arin.net/policy/proposals/2015\_7.html

### Staff and Legal Review (June 2016)



- Staff Understanding:
  - This policy allows a requesting org to demonstrate need by having an officer of the requesting organization attest that they will use at least 50% of their aggregate IPv4 addresses (including the requested resources and all previously held resources) on an operational network within 24 months.
  - For 8.3/8.4, staff would no longer conduct a needs assessment for the requested IPv4 block size per NRPM Section 4, and would accept an officer attestation as full justification for the requested IPv4 block size.

#### Staff and Legal Review (continued)



- Staff Comments:
  - Staff would apply this policy language to 24-month needs assessments for 8.3 transfers, 8.4 transfers, and transfer preapproval requests.
  - This policy could be implemented as written.

#### Staff and Legal Review (continued)



- Legal Assessment:
  - No material legal issue exists if the policy is adopted.
- Counsel's Comment:
  - Permitting receipt of resources based solely on attestation by an officer permits some amount of fraud, as it enables those willing to make a fraudulent statement the ability to obtain resources. The present combination of officer attestation and staff verification provides stronger assurance of compliance with policy intent.

#### Staff and Legal Review (continued)



- Resource Impact:
  - This policy would have minimal resource impact from an implementation aspect.

- The following would be needed in order to implement:
  - Updated guidelines and internal procedures
  - Staff training



# Presentation by the AC