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 pre-approval 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