



# Recommended Draft Policy ARIN-2016-1 Reserved Pool Transfer Policy

*Amy Potter*

# Problem Statement



- Currently NRPM section 8 does not distinguish between the transfer of blocks from addresses reserved for specific uses and other addresses that can be transferred.
- Sections 4.4 & 4.10 set aside specific address blocks based on the need for critical infrastructure and IPv6 transitions.

# Problem Statement

- Two issues arise if transfers of 4.4 or 4.10 space occur under current section 8 requirements...
  1. Transfers under sections 8.3 & 8.4 would allow recipients to acquire 4.4 & 4.10 space without ever providing evidence that they will be using the space for either critical infrastructure or IPv6 transition.
  2. Allowing out of region transfers of 4.10 space would complicate the single aggregate from which providers are being asked to allow in block sizes smaller than a /24.

# Summary of Changes



- Add to sections 8.3 and 8.4 under the "Conditions on source of the transfer:"
  - “Address resources from a reserved pool (including those designated in sections 4.4 and 4.10) are not eligible for transfer.”
- Section 8.2 would not be affected by these changes.
- Address resources from reserved pools could still be transferred as a part of an M&A.

# Policy Statement



Update Section 8.3

## 8.3. Transfers between Specified Recipients within the ARIN Region

In addition to transfers under section 8.2, IPv4 numbers resources and ASNs may be transferred according to the following conditions.

Conditions on source of the transfer:

- The source entity must be the current registered holder of the IPv4 address resources, and not be involved in any dispute as to the status of those resources.
- The source entity will be ineligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.
- 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 M&A transfers.
- The minimum transfer size is a /24
- Address resources from a reserved pool (including those designated in sections 4.4 and 4.10) are not eligible for transfer.

# Policy Statement

Update Section 8.4



## 8.4. Inter-RIR Transfers to Specified Recipients

Inter-regional transfers may take place only via RIRs who agree to the transfer and share reciprocal, compatible, needs-based policies.

Conditions on source of the transfer:

- The source entity must be the current rights holder of the IPv4 address resources recognized by the RIR responsible for the resources, and not be involved in any dispute as to the status of those resources.
- Source entities outside of the ARIN region must meet any requirements defined by the RIR where the source entity holds the registration.
- Source entities within the ARIN region will not be eligible to receive any further IPv4 address allocations or assignments from ARIN for a period of 12 months after a transfer approval, or until the exhaustion of ARIN's IPv4 space, whichever occurs first.
- 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.
- The minimum transfer size is a /24.
- Address resources from a reserved pool (including those designated in sections 4.4 and 4.10) are not eligible for transfer.

# Staff and Legal Summary



- Legal Assessment - The policy does not create a material legal issue. It should be noted that ARIN does permit transfers of IPV4 resources pursuant to 8.3 and 8.4. This policy is an exception to that transferability and is consistent with the intent and of the policy by which these allocations were made.
- Staff Assessment
  - If this policy is implemented, ARIN staff would not allow NRPM 8.3 and 8.4 transfers to include IPv4 addresses previously issued under NRPM 4.4 and 4.10 policies.
  - ARIN staff would continue to allow IPv4 addresses previously issued under NRPM 4.4 and 4.10 to be included in Merger and Acquisition (NRPM 8.2) transfers.
  - This policy could be implemented as written.

# Community Feedback



- During the presentation at ARIN 37 and on the ppml just after there was some discussion of altering the language to allow for transfers of reserved pool space to recipients that would have qualified to receive the space directly from ARIN.
- However, there appeared to be greater support for moving forward with the language preventing transfers (other than 8.2), and amending the NRPM in the future if a problem arose. Those who suggested allowing transfers also expressed approval of moving forward without them.

# Discussion



- Is there community support to move forward with the current language allowing no 8.3 or 8.4 transfers of reserved pool space?
- Are there any other concerns or objections?