ARIN46

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Recommended Draft Policy ARIN-2020-2: Reinstatement of Organizations Removed from Waitlist by Implementation of ARIN-2019-16

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History

Proposal	10 January 2020
Draft Policy	24 March 2020
Recommended Draft Policy	17 September 2020

Staff and Legal Review

Summary (Staff Understanding)

ARIN-2020-2 would restore organizations to the waitlist that were removed via ARIN-2019-16's adoption if their total IPv4 holdings amount to a /18 or less, allowing them to extend their two-year approval and qualify for up to a /22. This would exclude any organizations who have since had requests met via the transfer market, or any that do after ARIN 2020-2 is implemented.

Staff and Legal Review

ARIN Staff Comments

Staff would implement this by conducting a one-time IPv4 distribution to applicable organizations. The text is clear and understandable, and could be implemented as written.

ARIN General Counsel – Legal Assessment

The policy does not create any material legal issues.

Resource Impact

Implementation of this policy would have a minimal resource impact. It is estimated that it would take three months to implement, and would require:

- Staff training
- Updated guidelines and internal procedures
- Updated documentation on website

Background

- In February 2019, the ARIN Board suspended issuance of IPv4 resources through the waitlist in light of fraud and misuse.

- The Board referred NRPM section 4.1.8 (*Fulfilling unmet needs*) to the Advisory Council.

- In accordance with section 10.2 (*Policy Suspension*) of the PDP, the Advisory Council recommended an updated waitlist policy. The update was ratified by the Board and implemented on July 10, 2019.

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Background

- In order to address misuse, the updated policy added constraints on an organization's eligibility for IPv4 from the waitlist and the subsequent usage of those resources. The policy:

  - limits the size of block ARIN can issue on the waitlist to a /22

  - places a limit on the total existing IP address holdings of a party eligible for the waitlist at a /20 or less

  - makes resources issued from the waitlist ineligible for transfer until after a period of 60 months.

- This resulted in some organizations, that qualified under the previous policy's criteria, being removed from the waiting list.

Background

Old Waitlist Policy	New Waitlist Policy
• Requester specifies smallest block they'd be willing to accept, equal to or larger than the applicable minimum size specified elsewhere in ARIN policy.	• limits the size of block ARIN can issue on the waitlist to a /22
• Did not place a limit on the total existing IP address holdings of a party eligible for the waitlist	• places a limit on the total existing IP address holdings of a party eligible for the waitlist at a /20 or less
• made resources issued from the waitlist ineligible for transfer until after a period of 12 months	• makes resources issued from the waitlist ineligible for transfer until after a period of 60 months.

Problem Statement

- The implementation of the ARIN-2019-16 Advisory Council Recommendation Regarding NRPM 4.1.8: Unmet Requests caused some organizations to be removed from the waiting list that were approved under the old policy's eligibility criteria.

- These organizations should have been grandfathered when the waitlist was reopened to allow them to receive an allocation of IPv4 up to the new policy's maximum size constraint of a /22.

Stats

- 365 requests on the waitlist at the time the new policy was adopted
- 37 requests were removed for the org holding more than a /20 already (17 or more /24s)
  - Of those 37 request 13 had more than a /18 (65 or more /24s)
- 79 requests were adjusted to receiving a /22. All were notified in ARIN Online and accepted the adjustment to a /22
- 249 requests were unaffected by the policy change

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Policy Statement

- Add section 4.1.8.3 (temporary language in the NRPM to remain until the policy objective is achieved):

Restoring organizations to the waitlist

ARIN will restore organizations that were removed from the waitlist at the adoption of ARIN-2019-16 to their previous position if their total holdings of IPv4 address space amounts to a /18 or less. The maximum size aggregate that a reinstated organization may qualify for is a /22.

All restored organizations extend their 2 year approval by [number of months between July 2019 and implementation of new policy]. Any requests met through a transfer will be considered fulfilled and removed from the waiting list.

- *Timetable for Implementation:* Immediate

PPML

- 23 comments in favour
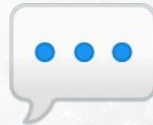 - 👍 "I support this initiative. It makes more sense to implement policies on a go forward basis without impacting those who played by the rules and are in need of the requested space. There has to be a better way to identify shell entities requesting space for re-sale by brokers versus service providers who are serving real customers and will make immediate use of the assignment. Thank you."

- 6 comments against
  - "Organizations who had made business plans that were dependent on obtaining IPv4 space through the waiting list process only have themselves to blame for not accounting for the possibility of never being able to obtain that space. As Andrew has mentioned, an application on the waiting list was never intended to be a guarantee of getting space on any timeframe, if ever, and organizations that failed to make contingency plans for that possibility should not be blaming ARIN for their own planning failures."

Discussion

- Should orgs that were removed from the waiting list as a result of 2019-16 be reinstated?

    - If yes, is a /18 limit on their total holdings appropriate?
    - If yes, is a /22 an appropriate maximum block size to be administered?

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Thanks! 🖖