

Policy Proposal 2007-12

IPv4 Countdown Policy Proposal



Policy Proposal 2007-12

History

Introduced on PPML	22 FEB 07
Designated Formal Proposal	20 MAR 07
First PPM Discussion	ARIN XIX
Last Revision	Not Revised

Proposal Text In Meeting Packet
http://www.arin.net/policy/2007_12.html

Policy Proposal 2007-12

Description

- Halts direct IPv4 allocations and assignments from ARIN two years after the day that the IANA pool is equal to 30 /8 IPv4 address blocks.

AC Shepherds

- ⇒ Bill Darte
- ⇒ Alec Peterson
- ⇒ Suzanne Woolf

Policy Proposal 2007-12

Legal Assessment*

Comment:

“This proposal addresses an important policy issue that is worthy of extended debate and consideration, but it proposes to do so in a way that may inadvertently create profound legal issues that would dramatically increase ARIN's potential legal liabilities. The policy proposes to set a hard date to terminate IPv4 allocations. Adoption and implementation of such a policy has a clear legal impact: it could, for example, be deemed a denial of service by ARIN, which is a utility provider of such services.”

Policy Proposal 2007-12

Legal Assessment (cont.)

Comment:

“For example, if IPv4 is exhausted and unavailable from IANA, there is little or no legal risk to ARIN. However, there are dramatically increased risks to ARIN associated with refusing to provide IPv4 addresses if ARIN has such addresses available, and is refusing to issue any of them to anyone based on a well intentioned but absolute policy.

ARIN's legal counsel will need to carefully evaluate any policy which results from this activity. Based on my current understanding, and I am willing to constantly reconsider and do additional research, I am likely to recommend that ARIN not adopt such a policy in its current form because of the profound legal risks it creates. This is one of the few times my advice prior to consideration of a policy has been so direct.”

Policy Proposal 2007-12

Staff Comments*

- It is unclear what the reference to "There will be no change to the policy on A-date" is. What does this mean? On this day and in the future?
- What happens to customers who come in after T-date to request IPv4 space? Do we deny these requests? Do we recommend IPv6? Do we do nothing? How can we deny a legitimate request when v4 resources still exist?
- Author did not indicate placement. Could be put in as new section 4.9 of the NRPM Section 4.9. Also, that section would need a heading, perhaps, "Availability of IPv4 Address Space".
- Need to make clear this applies to both assignments and allocations.

* April 2007

Policy Proposal 2007-12

Staff Comments (cont.)

- Change text that says "RIRs must" to "ARIN must". And references such as, "set the date" to "ARIN will set the date..."
- Change /8 references to have amounts written out, such as "10*/8" to "ten /8s".
- The following text lacks criteria and detail, "- It is however possible to move T-date forward at the point where address consumption exceeds the projections during the course of two years". Who decides, what projections, how much?
- Remove "Allocations or assignments to "critical infrastructure" after T-date should be defined by a separate policy."

Policy Proposal 2007-12

Staff Comments (cont.)

- Prior to T date, there may be an increase in requests, perhaps necessitating more staff.
- What happens to reserved space?
- If IPv4 is replaced by IPv6 then one could assume that organizations would return their IPv4 back to ARIN and that space would be available for reallocation. However, this policy would effectively preclude ARIN from reusing this returned space.
- The proposal would hasten the loss of revenue by approximately 12% per year (4% if the IPv6 fee waiver was lifted).
- NRPM Change – New section 4.9

Policy Proposal 2007-12 Implementation Assessment*

- **Resource Impact: Minimum**
- **Implementation: 90 days After BoT Ratification (Determining A and T dates assumes coordination among the RIRs.)**
- **Implementation Requirements:**
 - ⇒ Guidelines Change
 - ⇒ Staff Training

* April 2007

Policy Proposal 2007-12

PPML Discussion

- 0 for, 7 against
- Discussion topics:

Posts	People
155	47

⇒ Reclamation, NAT, IPv6, IPv4-IPv6 translation, 6in4 (protocol 41), black markets, fragmentation, the routing table, vendors, aggressive vetting, price controls, IANA's allocation size (/8s), trading IPv4 for IPv6, legacy space reappearance on the net, police functions, an x-rated panacea, switch vs. transition, IPv4 'emergency' reserve, and outreach and education.

Policy Proposal 2007-12

PPML Discussion (cont.)

● Comments:

- ➔ "The Proposers' point of view is to anticipate the run-out period to avoid a mix-up situation as far as we can."
- ➔ "I don't believe a policy is needed for this, just better publicity of the fact that IPv4 addresses are running out SOON..."
- ➔ "...more likely to cause a run on the bank right after adoption, speeding exhaustion, not holding it up."
- ➔ "I think we should switch to IPv6 after the T-date. However I do not believe the T-date is as soon as people think because I believe that reclamation should be tried, and I think there's a lot of IPv4 out there that could be reclaimed."
- ➔ "Perhaps the greatest benefit ARIN is providing here is giving us a forum to discuss the issue."

Policy Proposal 2007-12

http://www.arin.net/policy/2007_12.html