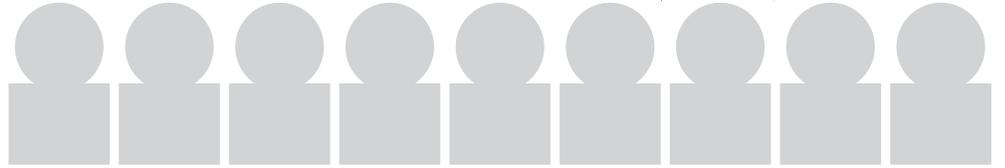


# Discussion Guide



## ARIN XXVIII Draft Policies and the PDP

<https://www.arin.net/ARIN-XXVIII/>

## **Welcome**

Policies in the ARIN region are developed by the Internet community using the open and transparent process described in the ARIN Policy Development Process (PDP). The Internet community develops policies via discussion on the ARIN Public Policy Mail List (PPML) and at the ARIN Public Policy Meetings. Anyone may participate in the process – ARIN membership is not required.

The ARIN Board of Trustees adopts draft policies recommended to it by the ARIN Advisory Council if the Board determines that the PDP has been followed, that support and consensus for a policy has been reached among the community, and if the draft policies are consistent with ARIN's Articles of Incorporation and Bylaws and with the applicable laws and regulations.

The ARIN Public Policy Meeting is conducted in an orderly manner to understand the sense of the majority, to respect the views of the minority, and to protect the interests of those absent. Accordingly, the flow of the meeting is structured according to a published agenda and participants are expected to follow Meeting Courtesies and the Rules of Discussion.

## **Meeting Courtesies**

All participants are requested to:

1. Either mute or turn off all communications devices such as cell phones, PDAs, and pagers.
2. Mute the audio output of their computers and other electronic devices.
3. Listen to the speakers and not engage in activities that are unrelated to the draft policy being discussed, such as processing e-mail.

## **Draft Policy Discussion Structure**

Policy development is facilitated by the use of a structured process at the Public Policy Meeting. The steps in this process are:

1. Draft Policy Introduction: The history of the draft policy, including the date of introduction, the date of designation as a draft policy, and any previous considerations is presented. The presentation also identifies the ARIN Advisory Council members who are shepherds of the draft policy. In addition, ARIN staff and legal assessments are reviewed.
2. Presentation: A member of the ARIN Advisory Council (or the petitioner) presents the draft policy.
3. Discussion: Discussion of the draft policy is conducted using the Rules of Discussion in the meeting program.

# ARIN XXVIII DISCUSSION GUIDE

## For Discussion

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This document contains the draft policies on the ARIN XXVIII agenda. The text of the draft policies in this document is up to date through 13 October 2011.

Included at the end of this document is a copy of ARIN's Policy Development Process (PDP).

## Table of Contents

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- 4 Draft Policy **2011-13**  
IPv4 Number Resources for Use Within Region
- 5 Draft Policy **2011-12**  
Set Transfer Need to 24 months
- 6 Draft Policy **2011-11**  
Clarify Justified Need for Transfers
- 7 Draft Policy **2011-10**  
Remove Single Aggregate requirement from Specified Transfer
- 8 Draft Policy **2011-9** (Global Proposal)  
Global Policy for post exhaustion IPv4 allocation mechanisms by the IANA
- 9 Draft Policy **2011-8**  
Combined M&A and Specified Transfers
- 10 Draft Policy **2011-7**  
Compliance Requirement
- 12 Draft Policy **2011-1**  
ARIN Inter-RIR Transfers
- 14 Policy Development Process

# Draft Policy 2011-13: IPv4 Number Resources for Use Within Region

[https://www.arin.net/policy/proposals/2011\\_13.html](https://www.arin.net/policy/proposals/2011_13.html)

Advisory Council Shepherds: **Bill Sandiford and Cathy Aronson**

**24 August 2011**

## Summary:

*This policy makes clear that ARIN should provide address assignments and allocations to organizations that are for use solely within the ARIN region.*

## Policy Statement:

Insert the following text in the NRPM:

### 4.2.1.7 - Presence within the ARIN region

These IPv4 addresses are issued solely for use in networks within the ARIN region. Organizations requesting IPv4 addresses from ARIN must provide documentation to demonstrate the addresses will be used to number customers/devices within the ARIN region and must agree to use the addresses solely for that purpose. This requirement shall be binding only on number resources requested after its ratification by the ARIN Board of Trustees.

### 4.3.7 - Presence within the ARIN region

These IPv4 addresses are issued solely for use in networks within the ARIN region. Organizations requesting IPv4 addresses from ARIN must provide documentation to demonstrate the addresses will be used to number customers/devices within the ARIN region and must agree to use the addresses solely for that purpose. This requirement shall be binding only on number resources requested after its ratification by the ARIN Board of Trustees.

## Rationale:

ICANN's ICP-2 document established a framework for regional Internet registries, each to serve a well-defined geographically scoped constituency.

The various RIRs will exhaust their free-pools at different times. This creates a situation in which requesting organizations attempt an end-run on ICP-2 and the RIR framework by coming directly to ARIN for space to use outside the ARIN region. In other cases, subsidiaries, sister organizations located within the ARIN region, or global organizations headquartered within the ARIN region have requested space that is ultimately destined for use outside the ARIN region. Failure to address this situation in a timely fashion will grant an unfair advantage to large multinationals who will be able to "shop around" requests for space and hasten RIR free pool runout in the ARIN region.

Leaving this loophole unaddressed is incompatible with ARIN's principle of stewardship.

This problem is not unique to ARIN. Similar proposals are under consideration in the LACNIC and AfriNIC regions.

**Timetable for implementation:** Immediate

## STAFF ASSESSMENT

### ARIN Staff Comments

ARIN staff has identified in a past policy experience report that ARIN is receiving an increasing number of requests where it is clear that the intended use is outside the region. While the definition of a Regional Internet Registry in NRPM 2.2 supports the principle that ARIN issues space for use in the region, this is not clearly stated within existing policy.

This lack of criteria has caused confusion for both staff and customers alike. Clear policy direction is needed, particularly now that IPv4 depletion is upon us, so that ARIN will issue space in a manner consistent with community expectations.

Staff notes that the proposed policy text is absolute in its phrasing, and while this appears to be appropriate for the policy intent, this staff evaluation does not include any specific assessment of the resources or efforts in enforcement post-issuance since the proposal does not address this aspect of the policy.

### ARIN General Counsel

Directionally, counsel has no concern regarding a proposed ARIN policy intended to restrict the remaining allocations of IPV4 addresses within the ARIN service region. However, this policy is rigid—it prohibits any use of such resources issues outside of the service region. Since a violation of the policy would justify revocation this aspect must be clearly evaluated.

**Resource Impact:** This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

- Updated guidelines
- Staff training

# Draft Policy 2011-12: Set Transfer Need to 24 months

[https://www.arin.net/policy/proposals/2011\\_12.html](https://www.arin.net/policy/proposals/2011_12.html)

Advisory Council Shepherds: **Robert Seastrom and Martin Hannigan**

**24 August 2011**

## Summary:

*This is a conditional policy proposal, germane only if 2011-11 eventually becomes ratified policy. This proposal would modify 2011-11 's changes to NRPM 8.3 to allow 8.3 requestors to show justified need for 8.3 transfers within a 24-month window, rather than the 12-month window proposed by 2011-11 .*

**Resource Impact:** This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

- Updated guidelines
- Staff training

## Policy Statement:

If ARIN-prop-146 [Draft Policy 2011-11] passes, also modify "will be utilized within 12 months" to "will be utilized within 24 months"

## Rationale:

Due to the complexity of the financial transaction that may be involved and the associated budgeting on the part of the receiving organization, 24 months is a more reasonable amount of forecast need to allow to be fulfilled via the transfer process.

Potential benefit to address aggregation by allowing fewer larger transfers sooner.

Change from previous version: uses the new language proposed in ARIN-prop-146 [2011-11] rather than modifying 4.2.4.4. Also no longer modifies 4.2.4.4 to apply to section 8.2 transfers.

**Timetable for implementation:** Immediate

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## STAFF ASSESSMENT

### ARIN Staff Comments

This proposal would still require an organization requesting an 8.3 transfer to qualify for the space under current ARIN policies, but would exempt them from the 3 month supply limitations currently set forth in NRPM 4.2.1.4 "Slow Start" and 4.2.2.1.3 "Three Months" and instead allow them to qualify for a 24 month supply of IPv4 address space.

This change would make the specified transfer policy fit more situations, at the risk that addresses may go to parties whose need does not actually materialize as expected based on their projected allocation rates.

### ARIN General Counsel

ARIN counsel strongly supports the immediate extension of assessed need from 12 to 24 months for proposed transfers. It is clear the longer time period will appropriately facilitate legally simpler transactions by those who are seeking to follow ARIN's policies. It may also meet goals of allowing larger blocs to be transferred to meet the needs of a single entity.

# Draft Policy 2011-11: Clarify Justified Need for Transfers

[https://www.arin.net/policy/proposals/2011\\_11.html](https://www.arin.net/policy/proposals/2011_11.html)

Advisory Council Shepherds: **Chris Morrow and Dan Alexander**

**24 August 2011**

## Summary:

*This proposal would modify existing NRPM policy 8.3 to specifically state that all organizations can justify a 12 month supply of IPv4 addresses.*

*Currently, the only reference to a timeframe for 8.3 transfers is contained in NRPM 4.2.2.4, Subscriber Members After One Year, which says that 8.3 transfers are exempt from the 3 month supply limitation that all other ISPs who are requesting additional IPv4 space must adhere to - "An organization receiving a transfer under section 8.3 may continue to request up to a 12-month supply of IP addresses." This proposal would remove this reference and instead, add the 12 month language to the proper section of NRPM.*

## Policy Statement:

Add to Section 8.3:

"...they can justify under current ARIN policies showing how the addresses will be utilized within 12 months."

Remove from 4.2.4.4:

"This reduction does not apply to resources received via section 8.3. An organization receiving a transfer under section 8.3 may continue to request up to a 12-month supply of IP addresses."

## Rationale:

An organization which is not able to obtain its initial IPv4 address assignment from ARIN post-runout would otherwise be limited to purchasing only a 3-month supply (because the language in 4.2.4.4 regarding 8.3 transfers is not triggered).

An organization which has only recently received its first allocation under the "last /8" criteria is also otherwise limited to purchasing only a 3-month supply (because the language in 4.2.4.4 is again not applicable).

There is also ambiguity if 4.2.2.1.3 is applied in that a transfer to a new organization might only need to show need for a /20 (because that is what is specifically called out) even though they are receiving a much larger block.

Previous version of this proposal modified Section 8 to point at 4.2.4, rather than the shorter and clearer modification to 8.3 now proposed.

There is also ambiguity with regard to transfers under 8.2 where the receiving organization is a new organization... not at all clear how "justified need" has been or should be determined, however this proposal no longer addresses this.

**Timetable for implementation:** Immediate

## STAFF ASSESSMENT

### ARIN Staff Comments

This proposal would still require an organization requesting an 8.3 transfer to qualify for the space under current ARIN policies, but would exempt them from the 3 month supply limitations currently set forth in NRPM 4.2.1.4 "Slow Start" and 4.2.2.1.3 "Three Months" and instead allow them to qualify for a 12 month supply of IPv4 address space.

If this became policy, it would align well with NRPM 8.2 (Transfers due to M&A) since the staff uses a 12 month utilization window when analyzing these types of transfer requests.

### ARIN General Counsel

*This policy presents no significant legal issues.*

### Resource Impact:

This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

- Updated guidelines
- Staff training

# Draft Policy 2011-10: Remove Single Aggregate requirement from Specified Transfer

[https://www.arin.net/policy/proposals/2011\\_10.html](https://www.arin.net/policy/proposals/2011_10.html)

Advisory Council Shepherds: **Scott Leibrand and Stacy Hughes**

**24 August 2011**

## **Summary:**

*This proposed policy would remove the phrase, "as a single aggregate" from the existing NRPM 8.3 policy thus allowing the transfer of multiple prefixes during an 8.3 transfer.*

## **Policy Statement:**

Modify Section 8.3 as follows: Change "can demonstrate the need for such resources, as a single aggregate, in the exact amount which they can justify under current ARIN policies" to "can demonstrate the need for such resources in the amount which they can justify under current ARIN policies"

## **Rationale:**

The "as a single aggregate" has been interpreted to apply only to "demonstrate the need" as opposed to the resources which may be received by ARIN staff. It is possible that the original intent was to require that each transfer be of a single aggregate.

HOWEVER, as multiple Section 8.3 transfers may be executed serially by a pair of entities which wish to use the specified transfer policy in order to transfer any number of blocks as long as there is needs justification for each, it simply saves the transferring entity, the recipient, AND ARIN paperwork to allow a transfer of multiple blocks to proceed as a single transfer.

**Timetable for implementation:** Immediate

## **STAFF ASSESSMENT**

### **ARIN Staff Comments**

- This would eliminate possible confusion and align the text with current implementation whereby transfers can involve multiple discontinuous IPv4 address ranges (in a single transaction with ARIN).

### **ARIN General Counsel**

Counsel affirmatively supports this suggested change. We do not see it as creating any additional legal liability. Given the myriad of factual situations that may arise, a single aggregate requirement could prove to be too rigid and could prohibit an overall good policy result.

### **Resource Impact:**

This policy would have minimal resource impact from an implementation aspect. It is estimated that implementation would occur within 3 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

- Updated guidelines
- Staff training

# Draft Policy 2011-9 (Global Proposal): Global Policy for post exhaustion IPv4

[https://www.arin.net/policy/proposals/2011\\_9.html](https://www.arin.net/policy/proposals/2011_9.html)

Advisory Council Shepherds: **David Farmer and Chris Grundemann**

**22 September 2011**

## Summary:

IANA issued the last /8s in February 2011. There is no global policy for IANA to allocate address space to the RIRs that is smaller than a /8. The proposal tells IANA to set up a recovered address space pool, accept returns by any means, and allocate address space to the RIRs in equal amounts, twice a year, minimum /24.

## Policy Statement:

The IANA shall establish a Recovered IPv4 Pool to be utilized post RIR IPv4 exhaustion. The Recovered IPv4 Pool will initially contain any fragments that may be left over in the IANA. It will also hold any space returned to the IANA by any other means. The Recovered IPv4 Pool will be administered by the IANA. It will contain:

- a. Any fragments left over in the IANA inventory after the last /8s of IPv4 space are delegated to the RIRs

The IANA inventory excludes "Special use IPv4 addresses" as defined in BCP 153 and any addresses allocated by the IANA for experimental use.

- b. Any IPv4 space returned to the IANA by any means. The Recovered IPv4 Pool will stay inactive until the first RIR has less than a total of a /9 in its inventory of IPv4 address space. When one of the RIRs declares it has less than a total of a /9 in its inventory, the Recovered IPv4 pool will be declared active, and IP addresses from the Recovered IPv4 Pool will be allocated as follows:

- a. Allocations from the IANA may begin once the pool is declared active.
- b. In each "IPv4 allocation period", each RIR will receive a single "IPv4 allocation unit" from the IANA.
- c. An "IPv4 allocation period" is defined as a 6-month period following 1 March or 1 September in each year.
- d. The IANA will calculate the size of the "IPv4 allocation unit" at the following times:

When the Recovered IPv4 Pool is first activated

At the beginning of each IPv4 allocation period

To calculate the "IPv4 allocation unit" at these times, the IANA will use the following formula: IPv4 allocation unit = 1/5 of Recovered IPv4 pool, rounded down to the next CIDR (power-of-2) boundary.

No RIR may get more than this calculation used to determine the IPv4 allocation unit even when they can justify a need for it.

The minimum "IPv4 allocation unit" size will be a /24. If the calculation used to determine the IPv4 allocation unit results in a

block smaller than a /24, the IANA will not distribute any addresses in that IPv4 allocation period.

The IANA may make public announcements of IPv4 address transactions that occur under this policy. The IANA will make appropriate modifications to the "Internet Protocol V4 Address Space" page of the IANA website and may make announcements to its own appropriate announcement lists. The IANA announcements will be limited to which address ranges, the time of allocation, and to which Registry they have been allocated.

## Rationale:

The policy provides a mechanism for the ongoing distribution of IPv4 address space, while removing the areas that have been problematic in previous attempts at this proposal. The proposal:

- Permits regional variation in runout policy amongst RIRs to be accounted for in the distribution of the Recovered IPv4 Pool
- Prevents the possibility of a single RIR being eligible to be allocated the entire Recovered IPv4 Pool in the first (and perhaps only) allocation period
- Removes two areas of policy that have failed to reach agreement in previous attempts at this proposal:
- How addresses should be placed in the Recovered IPv4 Pool
- References to how transfers should or should not take place

The NRO must clarify that this Global Policy is not intended to supersede the IETF's right to make IPv4 assignments for "specialised address blocks (such as multicast or anycast blocks)" as documented in section 4.3 of RFC 2860. The NRO and IANA should coordinate with the IETF to make such assignments as necessary, and honor any reservations made for works currently in progress.

**Timetable for implementation:** Once consensus has been reached in each of the 5 RIR regions, the policy will be forwarded to ICANN for approval and then implemented by the IANA.

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## STAFF ASSESSMENT

### ARIN Staff Comments

This proposal would fill a policy gap. It would allow the RIRs to return IPv4 address blocks smaller than a /8 to the IANA for equal redistribution amongst the RIRs.

## ARIN General Counsel

This policy poses no significant legal risks and is a useful advancement.

### Resource Impact:

This policy would have minimal resource impact from an implementation aspect. Since this is a global policy proposal it would be implemented after ratification by the ICANN Board. The following would be needed in order to implement:

- Updated guidelines
- Staff training

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## Draft Policy 2011-8 Combined M&A and Specified Transfers

<http://lists.arin.net/pipermail/arin-ppml/2011-July/022805.html>

Advisory Council Shepherds: **Marc Crandall and Scott Leibrand**

**26 July 2011**

### Summary:

*This policy offers a second option to 8.2 transfers where the IP addresses being transferred are underutilized. The new text would allow the transferor to request an 8.3 transfer of the unused portions, in lieu of the addresses being reclaimed and put into the free pool.*

### Policy Statement:

To section 8.2 change "... ARIN will work with the resource holder(s) to return, aggregate, or reclaim resources as appropriate via the processes outlined in current ARIN policy (for example, sections 4.6, 4.7, or 12 of the NRPM)." to "...ARIN will work with the resource holder(s) to return, aggregate, transfer, or reclaim resources as needed to restore compliance via the processes outlined in current ARIN policy."

### Rationale:

Given that both M&A transfers and specified transfers are possible, it should be possible to execute a combined transfer in which unneeded resources are transferred via 8.3 (rather than returning unneeded resources to the free pool) and the rest are transferred via 8.2. Doing this in the wrong order (i.e., attempting to execute the 8.2 transfer first) should not penalize the transferring entity... especially as ARIN's opinion as to what is "no longer justified under ARIN policy" is best known by ARIN and may not be completely knowable by the transferring entity. Note that as there is no ARIN policy permitting IPv6 specified transfers, this policy would only affect IPv4 resources at this time.

**Timetable for implementation:** Immediate

## STAFF ASSESSMENT

### ARIN Staff Comments

This proposal would fill a gap in the existing policy and would likely benefit the community.

### ARIN General Counsel

This policy poses no significant legal issues.

### Resource Impact:

This policy would have minimal resource impact from an implementation aspect. Since this is a global policy proposal it would be implemented after ratification by the ICANN Board. The following would be needed in order to implement:

- Updated guidelines
- Staff training

# Draft Policy 2011-7: Compliance Requirement

[https://www.arin.net/policy/proposals/2011\\_7.html](https://www.arin.net/policy/proposals/2011_7.html)

Advisory Council Shepherds: **Chris Grundemann and Owen DeLong**

**22 September 2011**

## Summary:

*This policy requires ARIN staff to not only identify customers who are out of compliance with policy, but to withhold services for those who fail to come into compliance within a designated time. Staff is to contact customers who are out of compliance with policy and give them 30 days to respond to our contact and to demonstrate they've begun to take corrective measures within 60 days. If either of these criteria is not met, the policy instructs staff to cease providing reverse DNS services to the customer or to begin reclamation efforts.*

## Policy Statement:

Update the following NRPM Sections:

12.4 - Update to:

Organizations found by ARIN to be out of compliance with current ARIN policy shall be required to update reassignment information or return resources as needed to bring them into (or reasonably close to) compliance.

1. The degree to which an organization may remain out of compliance shall be based on the reasonable judgment of the ARIN staff and shall balance all facts known, including the organization's utilization rate, available address pool, and other factors as appropriate so as to avoid forcing returns which will result in near-term additional requests or unnecessary route de-aggregation.
2. To the extent possible, entire blocks should be returned. Partial address blocks shall be returned in such a way that the portion retained will comprise a single aggregate block.

(leave 12.5 as is)

12.6 - Update to:

Except in cases of fraud when immediate action can be taken, an organization shall be given a minimum of thirty (30) days to respond. If an organization fails to respond within thirty (30) days, ARIN may cease providing reverse DNS services to that organization. If progress of resource returns or record corrections has not occurred within sixty (60) days after ARIN initiated contact, ARIN shall cease providing reverse DNS services for the resources in question. At any time ninety (90) days after initial ARIN contact, ARIN may initiate resource revocation as allowed in paragraph 12.5. ARIN may permit a longer period of time to come into compliance, if ARIN believes the organization is working in good faith to restore compliance with policy and has a valid need for additional time to comply, including but not limited to renumbering out of the affected blocks.

## Rationale:

This version addresses remaining legal concerns with specific wording.

An earlier version addressed several staff and legal concerns with the original text of this policy by clarifying the language and making it more concrete.

To date the community has not documented or firmly established use of an effective enforcement mechanism. This policy will support current policy and compel those who are allocated ARIN resources to maintain the proper WHOIS records in accordance with ARIN NRPM. While it is recognized this is not an absolute solution to ensure compliance, it is the best method under current ARIN policies.

**Timetable for implementation:** Immediate

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## STAFF ASSESSMENT

### ARIN Staff Comments

- The proposal updates the 12.4 language to allow folks to update SWIP/RWhois records as a way of becoming compliant with policy.
- The policy says either "take away reverse" or "reclaim the numbers". It would be helpful to staff if there was clear guidance as to when revocation was to be used over reverse dns removal. Without clear guidance, staff would implement this in such a way that reverse dns removal would be used as the first step of the enforcement, and revocation of the resource as the final step when an organization is unable to come into compliance within a defined time period.
- The term "out of compliance" is not well defined anywhere within this policy. Without additional criteria, staff will continue to interpret this term somewhat liberally, and to apply it at our discretion using our best judgment and consideration of existing factors. Only those organizations that we deem to be significantly in violation of existing policy will be flagged for further review and audit.
- Removing an organization's reverse DNS may negatively impact their business.

## **ARIN General Counsel**

This policy has significant legal implications, as it requires ARIN to withdraw services that may impact innocent and bona fide third parties utilizing the resources.

### **Resource Impact:**

This policy would have moderate resource impact from an implementation aspect. It is estimated that implementation could occur within 6 – 9 months after ratification by the ARIN Board of Trustees.

The implementation of this policy will require new software tools to track these newly defined deadlines. Additionally, there will likely be a significant increase in time and workload for the RS team as the potential for a significant increase in resource audits due to non-compliance with IPv6 reassignment requirements is great. This may even require additional personnel, although it is too early to tell right now.

The following would be needed in order to implement:

- Updated guidelines and website documentation
- Staff training
- Software tools would need to be developed to track the 30 and 60-day deadlines.

# Draft Policy 2011-1: ARIN Inter-RIR Transfers

[https://www.arin.net/policy/proposals/2011\\_1.html](https://www.arin.net/policy/proposals/2011_1.html)

Advisory Council Shepherds: **Bill Darte and Robert Seastrom**

**22 September 2011**

## Summary:

*This proposal would allow transfers of address space to and from the ARIN region as long as both RIRs agree to the transfer, and apply compatible, needs-based policies.*

## Policy Statement:

Address resources may be transferred in or out of the ARIN region to those who demonstrate need and plan to deploy them for a networking purpose within 3 months. Such transfers will take place between RIRs who share compatible, needs-based policies supporting entities agreeing to the transfer and which otherwise meet both RIR's policies. Transferred resources will become part of the resource holdings of the recipient RIR unless otherwise agreed by both RIRs.

## Rationale:

Since individual RIRs now allow transfers, it makes sense to be able to transfer between regions as well. Reasoning....It is explicit about...

in or out of region,

that transfers are between RIRs that support needs-based policies,

that RIRs have to agree,

that parties meet all of both RIR policies

that it is needs based, and the need is for a networking purpose,

that the receiving RIR is entitled to the addresses

I think all these details were raised as objections at one time or another...so it seems best to waste a few more words to be explicit.

It is not explicit about...

block sizes

utilization of prior allocations,

assignments or transfers

RFC 2050

subsequent transfers

**Timetable for implementation:** Upon ratification by the ARIN Board of Trustees

## STAFF ASSESSMENT

### ARIN Staff Comments

- The proposed policy language is unclear, vague, and is wide open for interpretation.
- The key phrase, "compatible, needs-based policies" is undefined. While many in the ARIN PPML community understand the intent of the phrase, it is really important that policy text be clear and understandable to all.
- The phrase, "which otherwise meet both RIR's policies" is also vague. Which policies must the transferor and transferee meet? The text should be revised to be precise to fully convey the author's intent.
- Note that the proper possessive of "RIR's policies" should be "RIRs' policies".
- The last sentence says, "Transferred resources will become part of the resource holdings of the recipient RIR unless otherwise agreed by both RIRs". It is constructed so that it basically says "It will be this, unless you want that." This isn't definitive policy text and should be clarified.
- This policy seems to directly contradict NRPM 8.3, Transfers to Specified Recipients, which disallows IPv4 number resources to be transferred outside of ARIN's region. Without a change to NRPM 8.3, ARIN would only be able to apply NRPM 8.2, Mergers and Acquisitions when reviewing inter-RIR policies.
- The staff would implement this policy in the following manner:
- For transfers from the ARIN region into another RIR region, ARIN would:
  - Confirm that the other RIR has "compatible, needs-based policies
  - Apply the relevant ARIN transfer policy criteria to the resource registrant
  - Seek confirmation from the other RIR that the requesting organization is physically located and has a verified legal presence in the region
  - Closely coordinate with the other RIR, informing them when ARIN is ready to complete the transfer
  - Complete transfer upon confirmation from the other RIR that the recipient has met that RIR's applicable transfer policies
- For transfers into the ARIN region from another RIR region, ARIN would:
  - Confirm that the other RIR has "compatible, needs-based policies
  - Apply the relevant ARIN transfer policy criteria to the resource recipient

- Verify that the requesting organization is physically located and has a verified legal presence in the region
- Closely coordinate with the other RIR, informing them when ARIN is ready to complete the transfer
- Complete transfer upon confirmation from the other RIR that the registrant has met that RIR's applicable transfer policies
- The previous version of this proposal limited these transfers to IPv4 space while this version does not. Was that an oversight or did the author intend to have this policy apply to both IPv4 and IPv6 addresses?
- This proposal allows the transfer of any IPv4 resource, whether it be Legacy/ERX address space or address space that was directly delegated to the RIR by IANA. Allowing the transfer of directly delegated number resources between RIRs could cause a variety of issues including:
  - Zone fragmentation
  - DNS synchronization problems
  - Potential administrative and operational issues in coordinating reverse addressing

### **ARIN General Counsel**

I suggest one major addition to this policy, which may be totally consistent with the drafter's intent. Currently, it is my understanding that ARIN policy does not permit transfers within the region unless the resources are covered by RSA or LRSA. The language of this section might properly be clarified to reinforce that resources not already under registration services agreement may not be transferred until ARIN has validated the correct resource holder

### **Resource Impact:**

This policy would have major resource impact from an implementation aspect. It is estimated that implementation would occur within 9-12 months after ratification by the ARIN Board of Trustees. The following would be needed in order to implement:

- Careful coordination between the RIRs on DNS issues and updates
- Updated guidelines
- Staff training

# POLICY DEVELOPMENT PROCESS

This version of the ARIN Policy Development Process was published on 7 January 2009. It supersedes the previous version.

## Part One – Principle

### 1. Purpose

This document describes the ARIN Policy Development Process (PDP). The ARIN PDP is the process by which all policies governing the management of Internet number resources in the ARIN region are developed by and for the ARIN community. ARIN's Internet number resource policies are documented community decisions that directly determine the rules by which ARIN manages and administers Internet number resources.

Internet number resource policies are developed in an open and transparent manner by the Internet community. Anyone may participate in the process - ARIN membership is not required. The Policy Development Process (PDP) described in this document defines how policy is established in the ARIN region. Part I of this document provides background information regarding the ARIN PDP and Part II provides the details of the process.

### 2. Scope

1. Policies developed through the PDP are community selfregulatory statements that mandate or constrain actions. They apply throughout the ARIN region. Policies contribute to the security and stability of the Internet as they foster good stewardship of Internet number resources by ensuring fair distribution of resources and facilitating the operation of the Internet by those who use them.
2. Policies developed through the PDP do not describe a step-by-step process. Such a process is called a procedure. Procedures are established by the policy implementer to execute the policy in such a manner to comply with the policy.
3. Policies developed through the PDP do not define a service to be offered by ARIN.
4. Policies developed through the PDP do not define or establish ARIN fees. All matters concerning fees are a fiduciary responsibility of the Board of Trustees.
5. The ARIN Board of Trustees adopts draft policies recommended to it by the ARIN Advisory Council if the Board determines that the PDP has been followed, that support and consensus for a policy has been reached among the community, and if the draft policies are consistent with ARIN's Articles of Incorporation and Bylaws and with the applicable laws and regulations.
6. Internet number resource policies are distinctly separate from ARIN general business practices and procedures. ARIN's general business practices (including fees) and procedures are not within the purview of the Policy Development Process. (The ARIN Consultation and Suggestion Process can be used to propose changes in non-policy areas.)
7. This version of the ARIN PDP is designed to bring forth clear, technically sound and useful policy; reduce overlapping policy proposals; require both staff and legal assessments; give adequate opportunity for discussion prior to each public

policy meeting; and provide a means of review prior to possible adoption. The PDP empowers the ARIN Advisory Council as a policy development body with checks and balances, and maintains an open and transparent process.

### 3. Policy Development Principles

All policies are developed following three principles: open, transparent, and bottom-up.

#### 3.1. Open

All policies are developed in an open forum in which anyone may participate. There are no qualifications for participation. Policy discussions in the ARIN region are conducted in an open, publicly accessible forum that consists of a Public Policy Mail List (PPML) and the Public Policy Meeting (PPM). Anyone may subscribe to the PPML and anyone may attend a PPM via the Internet or in person.

#### 3.2. Transparent

All aspects of the PDP are documented and publicly available via the ARIN website. The PPML is archived. The proceedings of each PPM are published. All policies are documented in the Number Resource Policy Manual (NRPM). All policy statements in the NRPM are cross referenced to the original policy proposal, the archives of the PPML, all related PPM proceedings, and the minutes of the appropriate Advisory Council and the ARIN Board of Trustees meetings. Finally any procedures that are developed to implement the policy are documented, publicly available, and not deviated from by the ARIN staff.

#### 3.3. Bottom Up

All policies in the ARIN region are developed by the ARIN community from the bottom up. The community initiates proposals; the ARIN Advisory Council develops the proposals into draft policies which are then discussed by the community. When the Advisory Council determines that the community has reached consensus on a proposal it recommends it to the Board of Trustees who after receipt adopts the draft policy as a policy. The Board of Trustees may not disapprove a policy, but if it has concerns about a draft policy, it may refer it back to the Advisory Council for further work.

### 4. Policy Development Process Philosophy

Internet number resource management requires good stewardship and judicious management. Thus policies must be developed that ensure fair distribution, meet technical requirements, and enable administration. All policy statements must be clear, complete, and concise. The criteria that are defined must be simple and obtainable.

#### 4.1. Fair Distribution

Although the available amount of Internet number resources appears to be infinitely large, their defined characteristics create a finite resource to which principles of conservation must be applied. These defined characteristics include the recognition of network topology realities. To prevent capricious consumption such as stockpiling, Internet number resource policies provide for the distribution according to demonstrated operational needs.

## 4.2. Technical Requirements

Policies must meet the technical requirements for the way that they are used in the operational environment. Policies must allow for aggregation of Internet number resources in a hierarchical manner to permit the routing scalability which is necessary for proper Internet routing. However, policies cannot guarantee routability of any particular Internet number resource as that is dependent on the actions of the individual Internet operators. Policies must not create a situation in which Internet number resources intended for public operation are not globally unique.

## 4.3. Administration

Policies must enable administration and management of Internet number resources that is neutral, impartial, and consistent. Policies must be unambiguous and not subject to varying degrees of interpretation.

## 5. Terms

### Proposal

An idea for a policy that is submitted to the Advisory Council using the policy proposal template.

### Draft Policy

A policy proposal that has been developed by the Advisory Council from individual submitted proposals or merged proposals, reviewed by ARIN staff and legal counsel, and posted for discussion on the PPML.

### Policy

A draft policy that has the support of the community and the Advisory Council, and has been adopted by the Board of Trustees.

## 6. The PDP Cycle

The policy development process is composed of a five (5) phase cycle – need, discussion, consensus, implementation, and evaluation.

### 6.1. Need

The PDP cycle begins with the identification of a need for either a new policy or the revision or elimination of an existing policy. This need is usually determined by a change in technology, a change in the operational environment of the Internet, or the result of the experience of the implementation of an existing policy.

### 6.2. Discussion

Draft policies are discussed by the community both on the public policy mailing list and in the public policy meeting.

### 6.3. Consensus

The Advisory Council determines the consensus of the community regarding the draft policy. It evaluates the type and amount of support and opposition to a policy as expressed by the community on the ppml and in the public policy meeting.

### 6.4. Implementation

The policy is implemented by ARIN staff using published procedures.

### 6.5. Evaluation

The implementation experience of the policy is periodically reviewed by the staff who reports the results to the Advisory Council and the community.

## Part Two – The Policy Development Process

This section provides the details of the ARIN Policy Development Process. A graphical flow depiction of the process is provided at Appendix A. All days are calendar days unless otherwise specified.

### 1. The Policy Proposal

Policy proposals may be submitted by anyone in the global Internet community except for members of the ARIN Board of Trustees or the ARIN staff. Proposals may be submitted any time to the ARIN staff for delivery to the Advisory Council using the template at Appendix B. There is no deadline for the submittal of policy proposals. Besides delivering the policy proposal to the Advisory Council, the staff will post the policy proposal to the public policy mailing list so that the community will be provided the ability to comment on the proposal. Policy proposals posted to the PPML by individuals will not be considered by the Advisory Council until the proposal is submitted to the staff and delivered to them. Only policy proposals that are developed into draft policies by the Advisory Council, or successfully petitioned, will be discussed for adoption on the PPML and at the public policy meeting.

### 2. Draft Policy

Upon receipt of a policy proposal, the Advisory Council assumes control of the proposal. The Advisory Council evaluates policy proposals and develops them into technically sound and useful draft policies that, if adopted, will make a positive contribution to the Number Resource Policy Manual. The development of draft policy consists of several steps.

#### 2.1. Clarity & Understanding

Upon receipt of a policy proposal the ARIN staff will work with the proposal originator to ensure there is clarity and understanding of the proposal text. Staff does not evaluate the proposal itself at this time, their only aim is to make sure that they understand the proposal and believe that the community will as well. Staff reports the results of this step to the Advisory Council within 10 days.

#### 2.2. Development & Evaluation

The Advisory Council develops a draft policy. During this effort they may take any action such as rewrite, abandon, merge various proposals, or use a proposal as an idea to generate a draft policy. The Advisory Council must make a decision regarding any policy proposal at their next regularly scheduled meeting that occurs after the Advisory Council receives the Clarity and Understanding Report from staff. If the period before the next regularly scheduled meeting is less than 10 days, then the period may be extended to the subsequent regularly scheduled meeting, but the period shall not be extended beyond 45 days. The Advisory Council will announce its decision regarding any policy proposal once they have decided how to utilize the proposal.

Once the Advisory Council crafts a draft policy it submits it for staff and legal review. This review will be completed within 10 business days. Upon receipt of the staff and legal comments, the Advisory Council examines staff and legal comments to ensure its understanding and resolve any issues that may have been raised. These comments may cause the Advisory Council to revise its draft policy.

#### 2.3. Discussion & Review

Once the Advisory Council completes its work on a draft policy, to include the staff and legal reviews, it publishes the draft policy and accompanying staff and legal reviews on the PPML for review and discussion. In order for a draft policy to be considered for adoption discussion at a public policy meeting it must be published on the PPML at least 35 days prior to the public policy meeting.

#### **2.4 Discussion Petition**

Any member of the community, including a proposal originator, may initiate a Discussion Petition if they are dissatisfied with the action taken by the Advisory Council regarding any specific policy proposal. If successful, this petition will change the policy proposal to a draft policy which will be published for discussion and review by the community on the PPML and at an upcoming public policy meeting.

The Discussion Petition must be initiated within 5 business days of announcement of the Advisory Council's decision regarding a specific policy proposal; the petition must include the proposal and a petition statement. The petition duration is 5 business days. The ARIN President determines if the petition succeeds (success is support from at least 10 different people from 10 different organizations). In order to be considered at an upcoming public policy meeting, the petition must be successfully completed at least 35 days prior to that meeting.

A successful petition may result in competing versions of the same draft policy. Staff and legal reviews will be conducted and published for successful petitions.

All draft policies that are selected by the Advisory Council or successfully petitioned are published for review and discussion on the public policy mailing list.

### **3. Public Policy Meeting**

Those draft policies that are published at least 35 days prior to a public policy meeting will be placed on the agenda of that meeting for adoption discussion. In the period leading up to the public policy meeting changes may be made to the text of the draft policy. At 10 days prior to the public policy meeting no further changes will be made to the draft policy text so that a single text for each draft policy is considered at the meeting. The text remains frozen until after the completion of the public policy meeting.

The draft policies that have been selected by the Advisory Council are presented by the Advisory Council at the public policy meeting. Draft policies resulting from successful petitions are presented by the petitioner. Competing draft policies, if any, will be discussed together. Discussion and votes at the meeting are for the consideration of the Advisory Council.

### **4. Consensus**

#### **4.1 Discussion Evaluation**

At the conclusion of the public policy meeting, the Advisory Council controls all draft policies, including those that were successfully petitioned. The Advisory Council reviews all draft policies and, taking into account discussion on the PPML and

at the public policy meeting, decides what to do with each one within 30 days following the public policy meeting. The Advisory Council may take any action such as rewrite, merge, abandon, or send to last call the draft policies. The results of the Advisory Council's decisions are announced to the PPML. Draft policies that are not abandoned or sent to last call are placed on the AC docket for further development and evaluation.

#### **4.2 Last Call Petition**

Any member of the community, including a proposal originator, may initiate a Last Call Petition if they are dissatisfied with the action taken by the Advisory Council regarding any draft policy. If successful, this petition will move the draft policy to last call discussion and review by the community on the PPML.

The Last Call Petition must be initiated within 5 business days of the announcement of the Advisory Council's decision regarding a specific draft policy; the petition must include the draft policy and a petition statement. The petition duration is 5 business days. The ARIN President determines if the petition succeeds (success is support from at least 10 different people from 10 different organizations).

#### **4.3 Last Call**

The Advisory Council selects draft policies that have the support of the community and the Advisory Council and sends these draft policies to a last call for review and discussion by the community on the PPML. The last call period will be for a minimum of 10 days. The Advisory Council may decide that certain draft policies require a longer last call period of review, such as those that were revised based on comments received while the text was frozen. If the Advisory Council sends a draft policy to last call that is different from the frozen version, then the Advisory Council will provide an explanation for all changes to the text.

#### **4.4. Last Call Review**

Within 30 days of the end of last call the Advisory Council determines consensus for each draft policy by reviewing last call comments, revisiting its decision (the Advisory Council may take any action such as rewrite, merge, or abandon), and determining readiness for consideration by the Board of Trustees. If the Advisory Council modifies a draft policy, it will be sent to another last call or may be placed back on the docket of the Advisory Council for further development and evaluation.

The results of the Advisory Council's decisions are announced to the PPML. The Advisory Council forwards the draft policies that it supports to the Board of Trustees for consideration.

#### **4.5 Board of Trustees Consideration Petition**

Any member of the community may initiate a Board of Trustees Consideration Petition if they are dissatisfied with the action taken by the Advisory Council regarding any last call review. If successful, this petition will move the draft policy for consideration by the Board of Trustees. The Board of Trustees Consideration Petition must be initiated within 5 business days of the announcement of the Advisory Council's decision regarding a specific last call review of a draft policy; the

petition must include the draft policy and a petition statement. The petition duration is 5 business days. The ARIN President determines if the petition succeeds (success is support from at least 10 different people from 10 different organizations).

## **5. Board of Trustees Review**

The ARIN Board of Trustees reviews and evaluates each draft policy within 30 days of receipt. The Board examines each draft policy in terms of fiduciary risk, liability risk, conformity to law, development in accordance with the ARIN PDP, and adherence to the ARIN Articles of Incorporation and Bylaws. The Board may adopt, reject or remand draft policies to the Advisory Council. Rejections will include an explanation. Remands will include an explanation and a recommendation. The Board may also seek clarification from the Advisory Council without remanding the draft policy. The results of the Board's decision are announced to the community via PPML.

## **6. Implementation**

The projected implementation date of the policy is announced at the time that adoption of the policy is announced. ARIN staff updates the NRPM to include the adopted policy and implements and publishes a new version of the manual.

## **7. Special Policy Actions**

### **7.1. Emergency PDP**

The Board of Trustees may initiate the Emergency PDP by declaring an emergency and posting a draft policy to the PPML for discussion for a minimum of 10 business days. The Advisory Council will review the draft policy within 5 business days of

the end of the discussion period and make a recommendation to the Board of Trustees. If the Board of Trustees adopts the policy, it will be presented at the next public policy meeting for reconsideration.

### **7.2. Policy Suspension**

If, after a policy has been adopted, the Board receives credible information that a policy is flawed in such a way that it may cause significant problems if it continues to be followed, the Board of Trustees may suspend the policy and request a recommendation from the Advisory Council on how to proceed. The recommendation of the Advisory Council will be published for discussion on the PPML for a period of at least 10 business days. The Board of Trustees will review the Advisory Council's recommendation and the PPML discussion. If suspended, the policy will be presented at the next scheduled public policy meeting in accordance with the procedures outlined in this document.

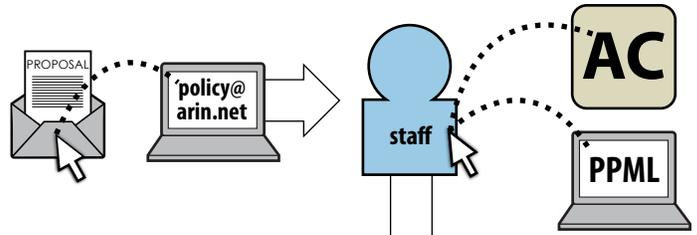
If, after a policy has been ratified and put into effect, the Board of Trustees receives credible information that a policy is flawed in such a way that it may cause unforeseen problems if it is continued to be followed, the Board may suspend the policy and request a recommendation from the ARIN Advisory Council on how to proceed. The Advisory Council's recommendation will be posted for discussion on the Public Policy Mailing List for a period of at least ten working days.

# Appendix A: PROCESS FLOW CHART

## 1 Proposal

### Submittal

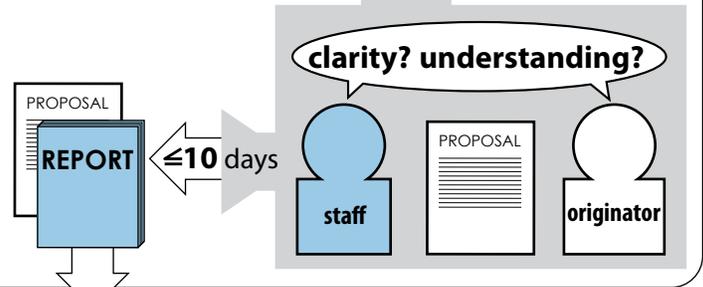
- By anyone at anytime (not Staff or BoT)
- Submit template to policy at ARIN
- Staff posts the proposal to PPML and forwards it to the AC.



## 2 Draft Policy

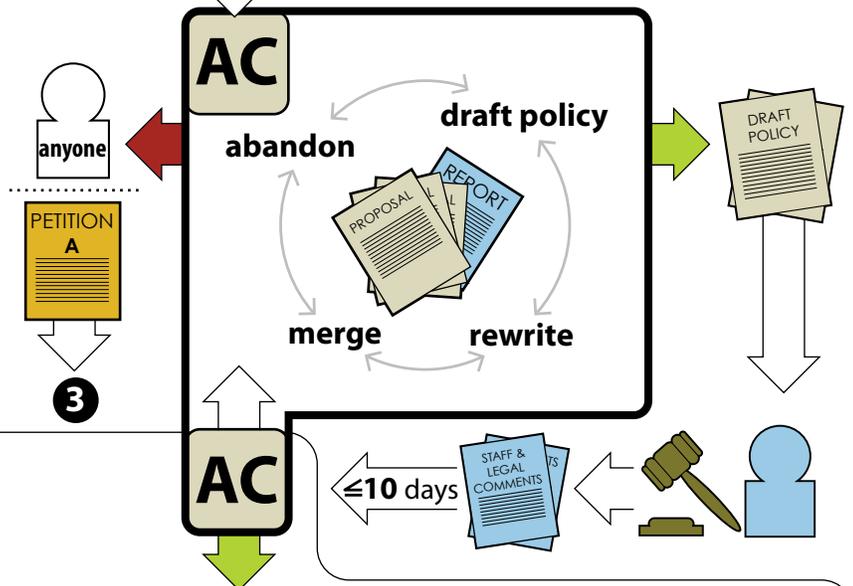
### a. Clarity & Understanding

- Staff and originator work together to ensure clarity and understanding of what is being proposed.
- Staff does not evaluate the proposal.
- Staff reports the result of this step to the AC within 10 days.



### b. Development & Evaluation

- AC assumes control of all proposals.
- AC develops and evaluates proposals to only bring forth technically sound policies that make a positive contribution to the Number Resource Policy Manual. The AC may rewrite, merge, abandon, etc.; for example, they may use a proposal as an idea to generate a draft policy.
- AC must submit for Staff and Legal review if it intends to move a draft policy forward. Review comments must be understood and addressed. Text may be revised in response.
- AC must make a decision regarding any proposal within 30 days of receipt (approx.).
- Decisions posted to PPML.



### c. Discussion & Review

- AC selects sound and useful draft policies for community discussion.
- Relevant staff and legal comments are published with each draft policy.
- Anyone may initiate Discussion Petition (Petition A\*) if dissatisfied with AC action.
- Staff and legal reviews are conducted for successful petitions.
- Draft policy is posted to PPML for community discussion and review.

### AC selects...



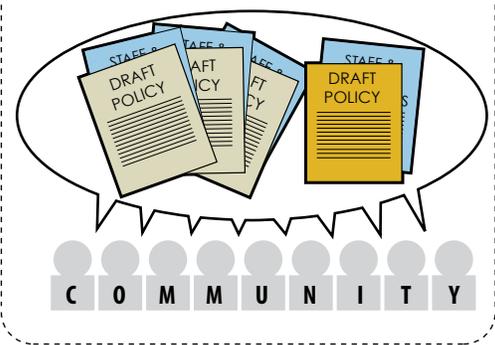
## 3 Public Policy Meeting

- The PPM agenda will contain those draft policies that will have been on the PPML for at least 35 days prior to the meeting.



Draft policy text is frozen 10 days prior to PPM so that a single text for each draft policy is considered at the meeting.

- The AC presents draft policies at the Public Policy Meeting; the successful petitioner presents their draft policy. Competing proposals will be discussed together.



### 3 Public Policy Meeting (cont.)

Discussion and votes at the meeting are for the consideration of the AC.

### 4 Consensus

#### a. Discussion Evaluation

- AC controls all draft policies.
- AC considers list and meeting discussion and may rewrite, merge, abandon, send to last call, etc.
- Draft policies not abandoned or sent to last call are placed on AC's docket for further development and evaluation.
- AC's decisions are posted to PPML.
- Anyone may initiate Last Call Petition (Petition B\*) if dissatisfied with AC action.
- AC must make a decision within 30 days of the PPM.

#### b. Last Call

AC selects draft policies that have support both in the community and the AC and sends them to a last call for comments on the PPML for at least 10 days. If text is different from the frozen version, AC will explain.



#### c. Last Call Review

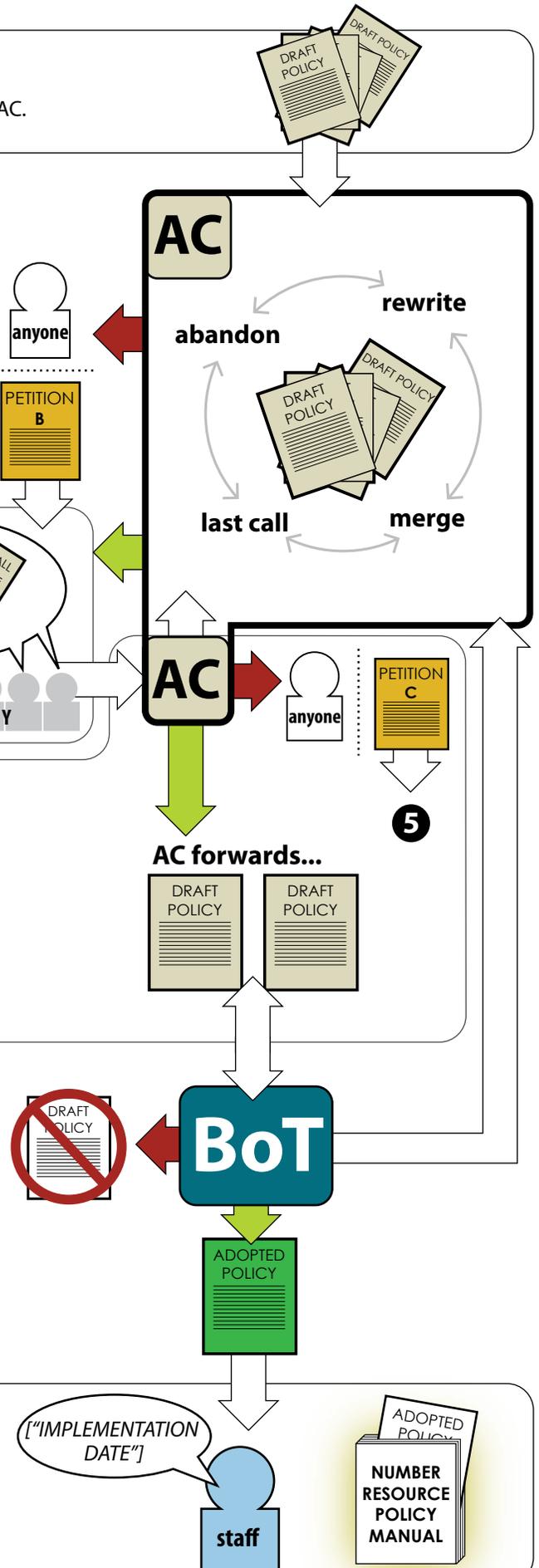
- AC determines consensus for each draft policy.
  - Reviews last call comments
  - Revisits earlier decision
  - Determines readiness for consideration by BoT
- AC may revise and repost to last call.
- AC's decisions are posted to PPML.
- Anyone may initiate BoT Consideration Petition (Petition C\*) if dissatisfied with AC action.
- AC determines consensus within 30 days of the end of Last Call.

### 5 Board of Trustees Review

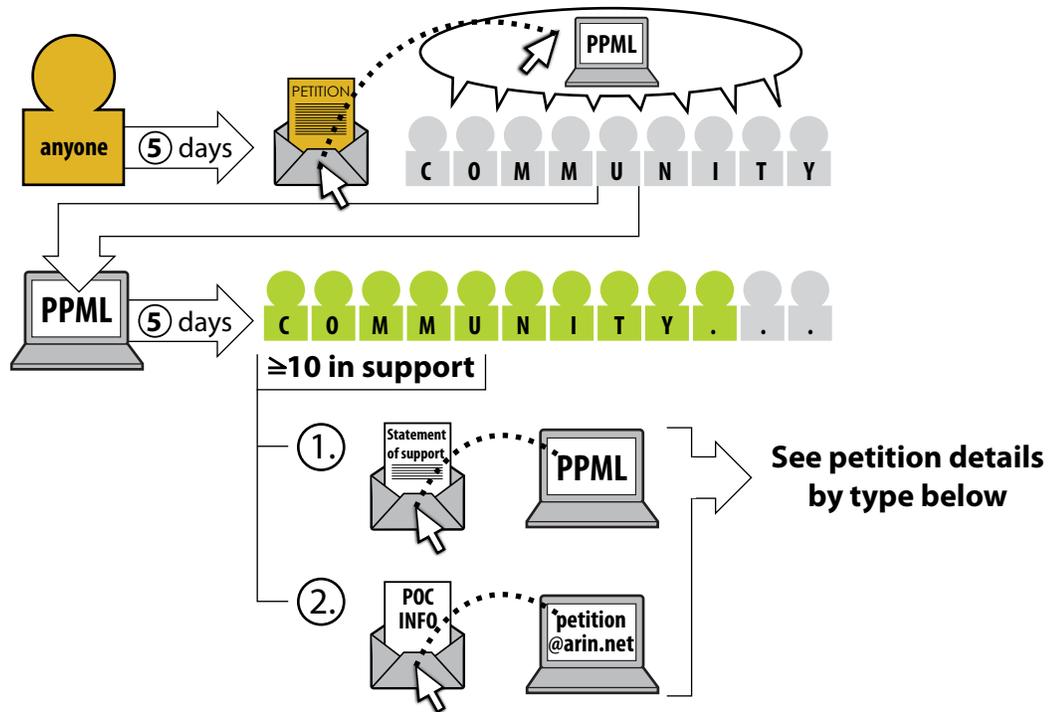
Within 30 days of receipt the Board examines each draft policy in terms of fiduciary risk, liability risk, conformity to law, development in accordance with the ARIN PDP, and adherence to the ARIN Articles of Incorporation and bylaws. The Board may adopt, reject or remand draft policies to the AC. Rejections will include an explanation. Remands will include an explanation and a recommendation. The Board may also seek clarification from the AC without remanding the draft policy. The results of the Board's decision are announced to the community via PPML.

### 6 Implementation

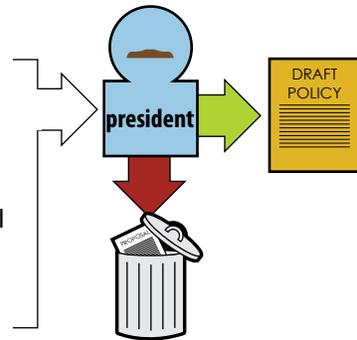
The expected implementation date of the policy is announced at the time that adoption of the policy is announced. ARIN staff updates to include the adopted policy into the Number Resource Policy Manual and implements and publishes a new version of the manual.



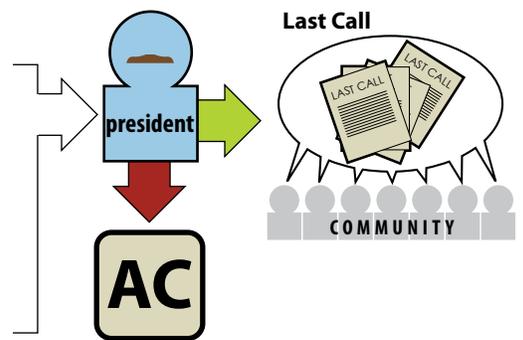
# Appendix A: PDP PETITIONS



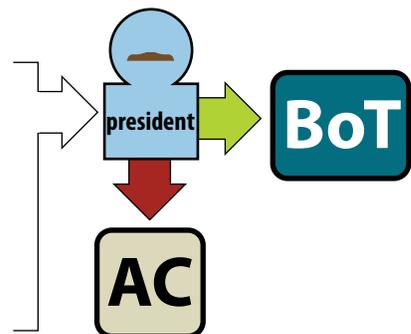
**Discussion Petition** - If any member of the community, including a proposal originator, is dissatisfied with the AC action on a policy proposal they can initiate a Discussion Petition to move this particular proposal to the PPML for discussion as a draft policy. Anyone may initiate the petition on the PPML (within 5 business days of publication of the AC's decision); the petition must include the proposal and a petition statement. The petition duration is 5 business days. The ARIN President determines if the petition succeeds. Success is support from at least 10 different people from 10 different organizations.



**Last Call Petition** - If any member of the community, including a proposal originator, is dissatisfied with the AC action on a draft policy they can initiate a Last Call Petition to move this particular draft policy to the PPML for last call. Anyone may initiate the petition on the PPML (within 5 business days of the publication of the AC's decision); the petition must include the draft policy and a petition statement. The petition duration is 5 business days. The ARIN President determines if the petition succeeds. Success is support from at least 10 different people from 10 different organizations.



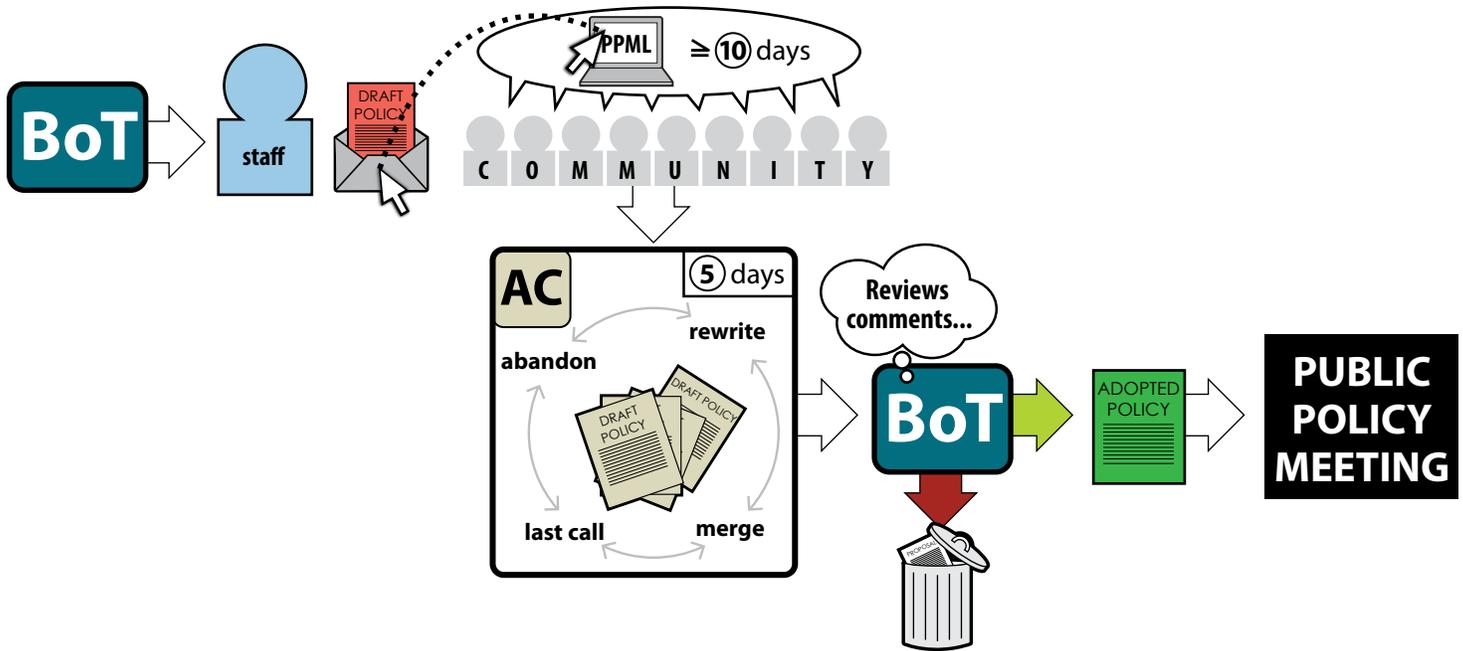
**BoT Consideration Petition** - If any member of the community is dissatisfied with the AC action on a draft policy they can initiate a Board of Trustees Consideration Petition to move this particular draft policy for consideration by the Board of Trustees. Anyone may initiate the petition on the PPML (within 5 business days of the publication of the AC's decision); the petition must include the draft policy and a petition statement. The petition duration is 5 business days. The ARIN President determines if the petition succeeds. Success is support from at least 10 different people from 10 different organizations.



# Appendix A: SPECIAL BoT POLICY ACTIONS

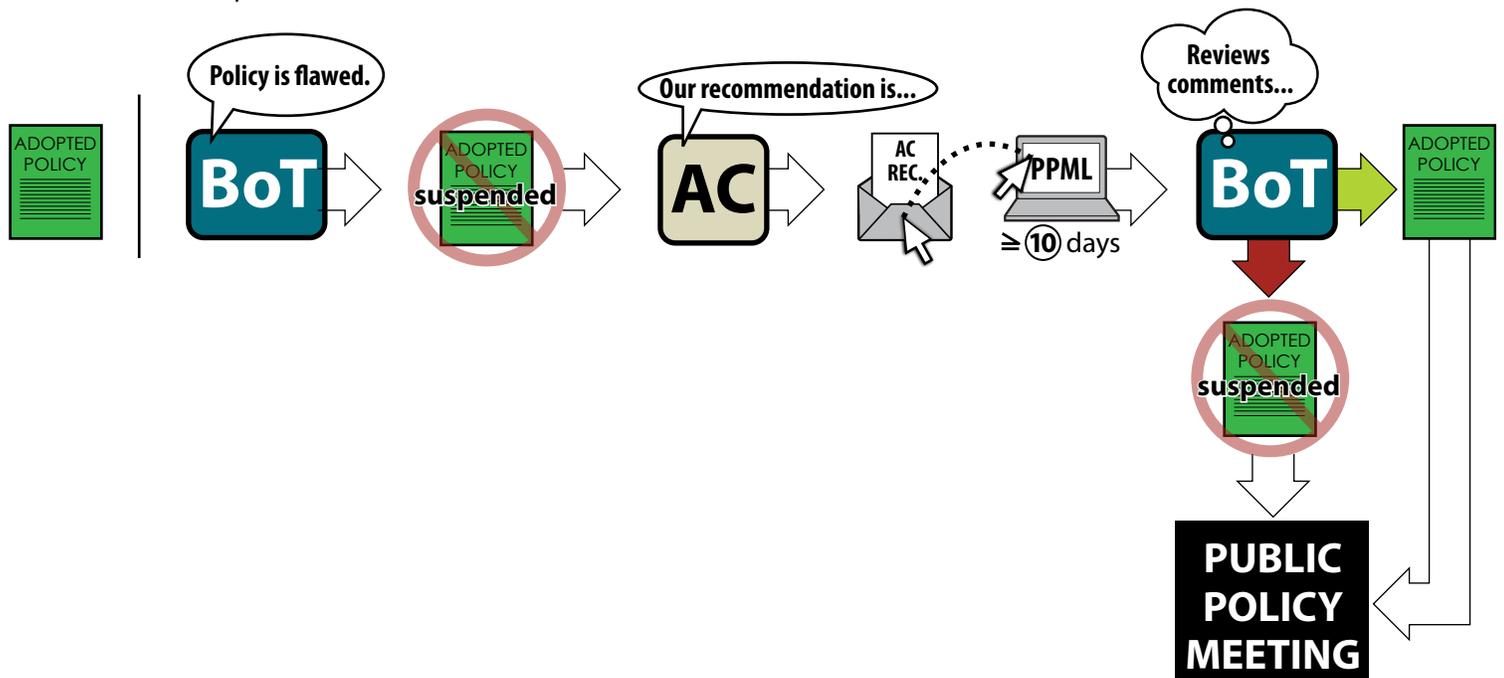
## Emergency PDP

The Board of Trustees may initiate the Emergency PDP by declaring an emergency and posting a draft policy to the PPML for discussion (minimum 10 business days). The AC will review the draft policy within 5 business days of the end of the discussion period and make a recommendation to the BoT. If the BoT adopts the policy, it will be presented at the next PPM for reconsideration.



## Policy Suspension

If, after a policy has been adopted, the BoT receives credible information that a policy is flawed in such a way that it may cause significant problems if it is continued to be followed, the BoT may suspend the policy and request a recommendation from the AC on how to proceed. The AC's recommendation will be posted for discussion on the PPML for a period of at least 10 business days. The BoT will review the AC's recommendation and the list discussion. If suspended, the policy will be presented at the next scheduled PPM in accordance with the procedures outlined in this document.



## Appendix B: PROPOSAL TEMPLATE

Guidelines for Completing the ARIN Policy Proposal Template are available at: [https://www.arin.net/policy/pdp\\_appendix\\_b.html](https://www.arin.net/policy/pdp_appendix_b.html).

Template: ARIN-POLICY-PROPOSAL-TEMPLATE-2.0

1. Policy Proposal Name:
2. Proposal Originator
  1. name:
  2. email:
  3. telephone:
  4. organization:
3. Proposal Version:
4. Date:
5. Proposal type:  
new, modify, or delete.
6. Policy term:  
temporary, permanent, or renewable.
7. Policy statement:
8. Rationale:
9. Timetable for implementation:

END OF TEMPLATE



