

# Policy Text

- Insert new section to NRPM to read as follows:
- 4.2.3.8 IP addresses reassigned by an ISP to an incumbent cable operator for use with Third Party Internet Access (TPIA) will be counted as fully used once they are assigned to equipment by the underlying cable carrier provided they meet the following requirements
- \* initial assignments to each piece of hardware represent the smallest subnet reasonably required to deploy service to the customer base served by the hardware
- \* additional assignments to each piece of hardware are made only when all previous assignments to that specific piece of hardware are at least 80% used and represent a three month supply
- \* IP allocations issued through 4.2.3.8 are non-transferable via section 8.3 and section 8.4 for a period of 36 months. In the case of a section 8.2 transfer the IP assignment must be utilized for the same purpose or needs based justification at a rate consistent with intended use.

# Problem Statement

Third Party Internet Access (TPIA) Providers are not able to receive subsequent allocations due to existing policy.

Access to Incumbent Cable networks are regulated in Canada.

The TPIA provider provides address space to the incumbent to be assigned over the Incumbent foot print. The TPIA Providers do not have control of the assignments.

Once a serving area is full and subsequent allocations are requested it is likely that the over-all utilization rate is below policy guidelines.

# Benefits

- This policy will help to increase the overall utilization rate of TPIA Providers.
- It resolves an immediate issue for the TPIA Providers that are being denied resources.
- It is generic enough to be used across the region.
- It would increase overall utilization over time.

# Drawbacks

The policy would allow for subsequent allocations to TPIA Providers below the 50 percent overall threshold currently in the cable policy.

It adds requirements that limit the ability to transfer the resources via 8.3 or 8.4.

Discussion?