Policy Implementation & Experience Report

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Policy Implementation Report



Purpose

- Present a quick overview of recently implemented policies
- Provide relevant operational updates or statistics on existing policies

Recently Implemented Policies

• ARIN-2011-1 "ARIN Inter-RIR Transfers" on July 31

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

 ARIN-2012-1 "Clarifying Requirements for IPv4 Transfers" on July 31

- Added criteria to prevent "flipping" of IPv4 space during an 8.3 transfer
- ARIN-2012-3 "ASN Transfers" on July 31
 - Added ASNs to "8.3. Transfers between Specified Recipients within the ARIN Region"



NRPM 8.3 and 8.4 Transfers

- First inter-RIR transfer was successfully completed on October 9, 2012
 - /24 went to a company in Australia
 - 2nd inter-rir transfer in progress
- 2 ASNs have been transferred under NRPM 8.3 since the policy was implemented in July

IPv6 ISP Block Sizes



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IPv6 End User Block Sizes



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Policy Experience Report



Purpose

- Review existing policies
 - Ambiguous text/Inconsistencies/Gaps/Effectiveness
- Identify areas where new or modified policy may be needed
 - Operational experience
 - Customer feedback
- Provide feedback to community and make recommendations when appropriate



Policies Reviewed

- Efficient utilization (referenced in NRPM 4.2)
- Initial vs Additional allocation policies for legacy holders (initial and additional referenced in NRPM 4.2.2 and 4.2.4)

Efficient Utilization



Question for the Community

Is the use of IP addresses in bulk to avoid email filtering considered to be efficient use?



Problem Statement

- ARIN is receiving requests from small and new email marketers for several thousand IP addresses (or more) based on:
 - Separate IP address per marketing campaign for IP based reputation
 - Limiting volume of email sent per IP address to avoid filtering
 - Rotating IP addresses to avoid filtering
- Yet many legitimate email marketers send out a large amount of email using only several hundred IP addresses

Problem Statement (cont'd)

 If successful marketing companies are able to run their entire business with only a few hundred IP addresses, should ARIN accept numbering plans from the same types of organizations who plan to consume thousands of addresses in order to accomplish the same goal?

Current Staff Practice

- We typically consider one IP address per device or customer to be acceptable, even if multiple customers per IP address are possible
- Although this may not necessarily be efficient utilization, we have no policy basis to deny if indeed they will be utilized
- Is clearer guidance from the community possible with respect to IP address usage for bulk email?

Initial vs Additional Allocation Policies for Legacy Holders



Question for the Community

Should a legacy space holder who comes to ARIN to request space for the first time be reviewed under the Initial policies or Additional Request policies ?



Problem Statement

Existing policies do not provide any guidance in this area



Current Staff Practice

- If a legacy space holder comes to ARIN for the first time:
 - They are reviewed under Initial allocation policies
 - Legacy space is counted towards policy justification requirements
 - All previous space must be 80% utilized

Issues

- An organization with legacy space may have efficiently used all of it, but still not qualify for an initial allocation:
 - Multi-homed ISP has a /24 (policy requires at least a /23 to qualify)
 - Single-homed ISP has a /21 (policy requires at least a /20 to qualify)

Issues

- Reviewing under additional allocation policies would provide an advantage to legacy holders:
 - Legacy /24 holder could qualify for a /22 by showing 80% utilization
 - Yet an ISP with a provider assigned /24 would be unable to qualify for a /22 under any policy

