



Recommended Draft Policy

ARIN-2014-19

New MDN Allocation Based on Past  
Utilization

## **2014-19 History**

1. Origin: ARIN-prop-211 from August 2014
2. AC Shepherds: Cathy Aronson, Andrew Dul
3. Presented at:
  - PPC at NANOG 62
  - ARIN 34
4. Advanced to Recommended Draft Policy in December 2014
5. Text Online & in Discussion Guide  
[https://www.arin.net/policy/proposals/2014\\_19.html](https://www.arin.net/policy/proposals/2014_19.html)

- **Staff Understanding**

- This policy proposes to change existing NRPM 4.5, "Multiple Discrete Networks" bullet 7 to add an additional qualifying criteria. Currently new sites applying under MDN will qualify for the minimum allocation size specified in 4.2.1.5 or under immediate need. This proposal adds the option for new MDNs with at least a year's worth of historical utilization data to request up to a 3 month supply of addresses.

## **Staff Comments**

1. If implemented, staff would require the organization to show a direct correlation between the demonstrated 1-year utilization rate and the new discrete network's 3 month need.
2. The policy requires an "applicable 1 year utilization rate" in order to qualify under this criteria. If implemented, staff would require that there be at least a full year of utilization data in order to qualify for a 3-month supply of address space.

## **Legal Assessment**

- This proposal does not create any material legal issue.

## **Implementation**

- 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 and internal procedures
  - Staff training

# **Presentation by the AC**

ARIN 2014-19 New MDN allocation  
based on past utilization



# Problem Statement

- The previous MDN policy was too limiting in that a new MDN could only qualify under immediate need. This was extended by ARIN-2013-8 where the minimum allocation will now be assigned unless immediate need for more can be demonstrated. Unfortunately, this policy did not go far enough. There may be some cases where there is a one year utilization history that is applicable to a new MDN. For example, imagine a network that is divided into four regions, each an MDN. Three of the four MDNs have been growing at a /20 per year. The fourth MDN has been growing at a /19 per year, it is over 80% utilized, and the region is too large. The region will be divided in half, which half of the current customers and their addresses to be migrated into a new MDN (Region 5). It is also anticipated that half of Region 4's growth will be shifted to Region 5. With Region 4 and Region 5 each above 80%, both should qualify for subsequent allocations at half of what was Region 4's growth rate.

# Issues with 2013-8

- The only way an organization could get more than the minimum was to apply via immediate need.
- This is not always possible and orgs should be allowed to apply based on prior utilization

# Policy Text

- replace section 4.5.4 created by 2013-8:
- Upon verification that the organization has shown evidence of deployment of the new discrete network site, the new network(s) shall be allocated the minimum allocation size under section 4.2.1.5 unless the organization can demonstrate additional need using the immediate need criteria (4.2.1.6).
- with:
- Upon verification that the organization has shown evidence of deployment of the new discrete network site, the new network(s) shall be allocated one of the following:
  - the minimum allocation size under section 4.2.1.5
  - more than the minimum if the organization can demonstrate additional need using the immediate need criteria (4.2.1.6)
  - **A 3-month supply of address space may be requested if the new MDN can show a demonstrated one-year utilization history.**

# Summary

- Allows a new method to justify an allocation for a new MDN site
  - Immediate need
  - Current minimum allocation
  - Three month supply based on prior utilization
- Currently a new MDN site would qualify for the minimum (/24) unless need could be justified with immediate need. (requires deployment in 30 days)
- This change gives MDN operators the option to justify a larger block based on prior utilization

# Draft Status & Questions

- This is currently a recommended draft that could go to last-call after the PPC.
- The AC is looking for confirmation and support from the community that this is a policy that should be adopted.
- "If staff is already implementing MDN policy this way, would it still be useful to make this policy change to provide clarity to MDN users in understanding the NRPM?"
- If you do not support this policy, why not?