



## **Draft Policy 2017-4**

***Remove reciprocity requirement for inter-RIR transfers***

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# Problem Space



AFRINIC and LACNIC are currently considering one-way inter-RIR transfer proposals. Those RIR communities feel a one-way policy that allows network operators in their regions to obtain space from another region and transfer it into AFRINIC and LACNIC may best meet the needs of the operators in that region.

ARIN staff, in reply to an inquiry from AFRINIC, have formally indicated that ARINs 8.4 policy language will not allow ARIN to participate in such one-way transfers. The staff formally indicate to AFRINIC that the word reciprocal in 8.4 prohibits ARIN from allowing ARIN-registered space to transfer directly to AFRINIC (in this context).

# Guiding Principles



- ARIN as a community should recognize that other RIR operator communities have different needs than we do.

We should recognize that:

- network operators in AFRINIC in LACNIC have need to obtain space in the market;
- they have reasons they think are important to not allow two-way transfers; and
- we should understand that the history of the RIR system has led to LACNIC and AFRINIC having multiple orders of magnitude less IPv4 address space than ARIN does.

# Policy statement



Add the following sentence after the first sentence of NRPM 8.4:

Inter-RIR transfers may take place to an RIR with a non-reciprocal inter-RIR transfer policy only when the recipient RIR has an IPv4 total inventory less than the average (mean) of the IPv4 total inventory among all of the RIRs.

# The Numbers



ARIN has 1,686,159,104 billion IPv4 addresses in its inventory.

APNIC has 881,734,912 million IPv4 addresses in its inventory.

RIPE has 822,316,800 million IPv4 addresses in its inventory.

LACNIC has 190,775,552 million IPv4 addresses in its inventory.

AFRINIC has 121,242,624 million IPv4 addresses in its inventory.

Global average: 740,445,798 million IPv4 addresses.

**2017-04 will specifically allow ARIN to approve source transfers out to both LACNIC and AFRINIC.** Each RIR would need to have an actual “transfer policy” in place (which need not be bidirectional but must be compatible and needs-based) in order to be considered under this policy.

# ARIN Staff Comments



- Consider changing “Remove” in the title to a more appropriate verb such as modify, particularly since the requirement remains in place under some circumstances.
- Quarterly, ARIN will compute the average of the total inventory and assess each RIR’s total inventory against that average. The resulting assessment will be posted online.
- This policy would be implemented to work only with RIRs that have a unidirectional, compatible, needs-based Inter-RIR transfer policy in place and meet the address pool criteria of this policy.
- To eliminate any possible confusion of the meaning of ‘reciprocity’ it is recommended that ‘with a non-reciprocal Inter-RIR transfer policy’ would be better phrased as ‘with a unidirectional, compatible, needs-based Inter-RIR transfer policy.’

# ARIN Staff Comments (continued)



- A corollary recommendation is to change section 8.4 of the NRPM so that the word “reciprocal” is changed to “bidirectional” in the first sentence. Similarly, the word “reciprocal” in the title of the draft policy could be changed to “bidirectional”.
- This proposed policy may be more complex than necessary, since there is a modest number of transfers of number resources coming into the ARIN region via NRPM 8.4, which suggests a very small potential impact if the policy change were to remove the bidirectional policy requirement in its entirety.
- This policy could be implemented as written with the recommended changes.

# ARIN General Counsel – Legal Assessment



The staff's interpretation spelled out above, that removing “reciprocal” does not remove “compatible” and “needs based”, is a legally critical aspect of how this policy would be implemented. Absent such an understanding counsel would recommend against an unlimited transfer policy.



## Next Steps



The most recent iteration of staff and legal feedback presented here has not yet been merged into the working copy of the proposal.

The shepherds are seeking community feedback in addition to the current iteration of staff and legal feedback, to be integrated with the above and presented for another round of staff and legal feedback (!)

# Discussion



**#ARIN40**