From: Louis Lee [mailto:louienet@gmail.com] On Behalf Of Louie Lee
Sent: Monday, April 14, 2014 9:56 AM To: steve@shinkuro.com; Leo Vegoda; Elise Gerich; David Olive; Barbara Roseman; John Jeffrey
Cc: German Valdez; ASO Secretariat; AC-COORD List
Subject: Re: Policy implementation questions relating to the Global Policy for Post Exhaustion IPv4 Allocation Mechanisms by the IANA

Advice from the ASO Address Council to the ICANN board and to the ICANN Staff performing the IANA function on implementation of Global Policy for Post Exhaustion IPv4 Allocation Mechanisms by the IANA

Preamble:

In line with the ASO Address Council’s responsibility of "providing advice to the Board of ICANN on number resource allocation policy, in conjunction with the Regional Internet Registries," laid out in the ICANN/ASO MoU, ICANN on 16th November 2013 wrote to the ASO Address Council seeking guidance on the interpretation of the Global Policy for Post Exhaustion IPv4 Allocation Mechanisms by the IANA, which was ratified in May 2012.

The request specifically stated that according to the Global Policy, "Allocations from the IANA may begin once the pool is declared active." It is not clear whether this means that allocation from the Recovered IPv4 Pool should be made straight away or whether they should happen at the start of the next "IPv4 allocation period," the "6-month period following 1 March or 1 September."

This is a formal response to the request for guidance from the ASO Address Council to ICANN.
Advice:

After consultations with the Internet number communities through the respective RIRs, the ASO Address Council has drawn rough community consensus and advises IANA to implement the Global Policy for Post Exhaustion IPv4 Allocation Mechanisms by the IANA as follows:

1. Make the first allocation from the IANA recovered pool immediately after the pool is declared active. This first allocation should also be consistent with the rest of the policy.

2. Make all subsequent allocations consistent with the IPv4 allocation period specified in the policy text.

Methodology:

To arrive at this recommendation the ASO Address Council elicited feedback from the 5 Regional Internet Registries. The feedback was arrived at by cascading the request for guidance to the respective communities. The coordination work was done by the member of the ASO Address Council from the various communities.

Summary of discussion:

AFRINIC:

There were 6 responses and the general view is that whereas there are no objections to either options A or B, there is support for immediate activation as soon as an RIR declares it has less than a /9 in its inventory for the first allocation, however, subsequent allocations must be in line with the next allocation round of either 1 March or 1 September of each year.
ARIN:

There question was put to ARIN-PPML and received 14 responses which all supported not waiting. The ARIN community felt it should not defer making the initial allocation to RIRs, except in a few exceptional cases where it might make sense. The ARIN community believes the policy was written to be flexible and allow IANA the discretion to defer if such an edge case occurred.

The discussion concluded that while discretion and flexibility are desired, there was no clear prescription for when IANA should exercise such discretion. Given the desire for IANA to act in a way that is predictable to the community and consistent with expectations, simply making the allocation immediately provides clarity and predictability, which are valued more than the benefit of such flexibility in the face of an unlikely corner case.

APNIC:

During consultation with the community at APNIC 37 and through the policy mailing list, a few private responses were received including the message from co-author of original policy (also co-chair of APNIC Policy SIG). All responses and discussions yields same conclusion that ICANN staff should begin allocations from the Recovered IPv4 pool immediately after the pool is declared active.

LACNIC:

During consultation with the community, 5 responses were received on the policy mailing list. Even when some parts of the text of policy can generate an ambiguous interpretation, the spirit of all comments was to accept the starting of allocation from the recovery pool as soon as it will be declare active. The
subsequent allocations must follow the procedure explained in the text of the referred policy.

RIPE:

There were 5 responses from community members and 2 informational mails from IANA Staff, Leo Vegoda. There was either support for the option to make the first allocations from the Recovered IPv4 pool straight away as soon as the pool is declared active, or respondents did not see much difference between the options and nobody strongly preferred the option of waiting until an allocation period to make the first allocations. Accordingly the thread was concluded with that RIPE region had consensus on the reading of the Global Policy for post exhaustion IPv4 allocation mechanisms by the IANA, that the first allocations from the Recovered IPv4 pool should be made straight away as soon as the pool is declared active.