

October 2008

## ETNO Expert Contribution on IP Addressing in a Post IPv4 World Reallocation of resources

### Executive Summary

ETNO<sup>1</sup> has considered the new version of the RIPE 2007-08 Policy Proposal Enabling Methods for Reallocation of IPv4 Resources, submitted for discussion in the RIPE Address Policy Working Group mailing list. ETNO believes this revised version that provides for additional criteria to demonstrate the need for an LIR to receive IPv4 addresses through transfer, is significantly improved. Therefore ETNO will support this Policy Proposal.

Still there are outstanding considerations regarding the extent and effect of this proposal that should be addressed by the community.

### 1. Introduction

ETNO members have carefully reviewed the new version of the RIPE Policy Proposal 2007-08 related to the "Enabling Methods for Reallocation of IPv4 Resources", which proposes to use inter-LIR transfer mechanisms.

This new version of the proposal has been examined in light of the principles expressed in the two previous ETNO position papers circulated in the RIPE Address Policy Working Group mailing list (CP082 – 2007/10, and EC097 2008/05 publicly available also at [www.etno.be](http://www.etno.be), Position Papers 2007/2008).

ETNO welcomes the opportunity to provide comments on this new version.

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<sup>1</sup> The European Telecommunications Network Operators' Association is representing 40 major companies from 34 European countries, providing electronic communications networks over fixed, mobile or personal communications systems. ETNO's primary purpose is to establish a constructive dialogue between its member companies and actors involved in the development of the European Information Society to the benefit of users. More information on ETNO can be found at: [www.etno.be](http://www.etno.be)

## 2. ETNO analysis and comments

The major change between Version 2 and Version 3 of the policy proposal is the requirement for the receiving LIR to have their need evaluated by the RIPE-NCC before a transfer can be completed. ETNO believes that this requirement is necessary in order to avoid speculative behaviours.

Based on the above ETNO will support RIPE 2007-08 "Policy Proposal Enabling Methods for Reallocation of IPv4 Resources", but would like to propose for a clarification to be included in the proposal. ETNO suggests that following the text of the proposal: "An LIR may only receive a transferred allocation after their need is evaluated by the RIPE NCC", the following text should be inserted: "The transfer should be formally approved by the RIPE-NCC".

## 3. Outstanding considerations

ETNO has outstanding considerations regarding the extent and effect of this proposal that should be addressed by the community. It should be mentioned that these considerations do not impact the approval of the current policy proposal.

1. ETNO believes that reclamation by the RIRs of allocated but unused addresses can offer a way to reuse IPv4 blocks of addresses. In the future, what impact will this new policy have on any reclamation activity? Is it possible to reconcile the reclamation activity from historic, legacy space and the procedures for inter-LIR transfer?
2. Since the significant volume of allocated but unused addresses resides in the historic, legacy space and these addresses are generally not maintained by Local Internet Registries, what will be the impact of this policy proposal? In the future will it be a requirement that the donor be an LIR even in the situation where legacy space is being transferred? Such a requirement could be counter productive to reintroduce unused legacy space in the RIR/LIR management.
3. Given the limited scope of the policy, does this proposal have a significant impact on the availability of additional IPv4 addresses prior to exhaustion of the pools of "fresh" IPv4 addresses from IANA?

## 4. Conclusion

ETNO is positive to any flexibility that could provide a limited amount of IPv4 addresses, and can help the transition to IPv6, but believes that this will not solve the broad issue if IPv4 exhaust and should not distract ISPs and operators from finding appropriate and long term solutions to maintaining a stable Internet.

Based on the above ETNO will support RIPE 2007-08 “Policy Proposal Enabling Methods for Reallocation of IPv4 Resources”, but has requested for a clarification to be included.