AFRINIC 25 Public Policy Meeting
Minutes

Date: 29 November 2016
Mauritius

Agenda

1100 - 1110	*1.* Welcome, Introduction & Agenda Overview
1110 - 1120	*2.* Quick Look at the AFRINIC Region PDP
1120 - 1130	*3.* Summary of Interesting Proposals at other RIRs
1130 - 1230	*4.* Proposal: Inbound Transfer Policy
	L U N C H
1330 - 1430	*5.* Proposal: Soft Landing Overhaul
1430 - 1530	*6.* Proposal: IPv4 Soft Landing - BIS
	B R E A K
1600 - 1700	*7.* Proposal: Internet Number Resources Review by AFRINIC
1700 - 1800	*8.* Proposal: IPv4 Resource Transfers within the AFRINIC region
1800 - 1900	*9.* Open Policy Microphone & Closing

1.0 Welcome, Introduction & Agenda Overview

The meeting was called to order at 1100 local time in Mauritius with welcome remarks from Ernest Byaruhanga, who introduced the two co-chairs, Adewole Ajao, the session chair for the day, and Sami Salih (participating remotely). A community member requested that two items that were recently discussed on the rpd list - PDP Review and Board approval & revocation of policy proposals, be included on the agenda. The items were listed to be discussed during the Open Policy Microphone.

2.0 Quick Look at the AFRINIC Region PDP

A flow chart of the AFRINIC region PDP was presented and explained by the co-chair to the community members present.

A brief update about the recently adopted Consolidated Policy Manual (CPM) was shared. It was noted that there has been a transition from the system of individual policy documents to the CPM since October 2016, following a process of community consultation and call for comments on the draft CPM, and that the Board approved to adopt and implement the CPM thereafter. There was a comment on the floor about the CPM implementation not having gone through the PDP and the responses received pointed to the fact that the community was given opportunities to make their inputs. A request was also made to be able to view snapshots of the CPM at

different points in time; This is already present in PDF form in the revision history at the foot of the CPM page. It was recommended that any challenges observed by the community be brought forward as they are discovered so that staff can look at ways of improving the implementation.

3.0 Summary of Interesting Proposals at other RIRs

Policy news from other RIRs was shared by representatives from each respective RIR. Andrea Cima from RIPE NCC, Sergio Rojas from LACNIC, Guangliang Pan from APNIC and Sean Hopkins from ARIN each talked about latest policy discussions in their respective communities.

4.0 Proposal: Inbound Transfers Policy

Presented by Andrew Alston and Christopher Mwangi

Authors noted that at the moment, although the AFRINIC IPv4 inventory is the largest of the 5 RIRs, Africa still globally has the least amount of IPv4 space, and allowing inbound flow of this space from the transfer markets of other regions lets those African companies who will still need space after the AFRINIC inventory is exhausted to bring it in and use it on the continent.

It was noted that this proposal covers all resource types (including IPv6 and ASNs) to cater for those multinational companies that may wish to consolidate their resources at a single point of administration and not maintain multiple RIR memberships.

Authors further noted that:

- Legacy IPv4 space shall cease to be legacy after an inbound transfer into AFRINIC.
- Some RIRs have indicated that the policy may not be compatible with theirs because it's one-way, and that making transfers bidirectional would make the proposal compatible. Authors stated that one-directional compatibility is something they could lobby for at other RIR communities, but will be at a point in future after the AFRINIC community has accepted the proposal as written.

Comments were received from the floor as follows:

- RIPE NCC clarified that the policy proposal as written is compatible with RIPE transfer policies, and that RIPE NCC can authorize outbound transfers with AFRINIC if the proposal is implemented. It was also stated that at the RIPE73 meeting in Madrid, the proposal was mentioned to the RIPE community for their comments, and the community generally understood the proposal and did not express any concerns on it.

- There were several statements opposed to the proposal on the basis that:

  o It would slow down IPv6 adoption in the region. The authors noted that it would not slow IPv6 adoption, since inbound space would be from transfer markets, whose prices will be out of reach of many African ISPs anyway – and those ISPs may instead opt for IPv6.

  o It seems unfair to other regions whose IPv4 pools are now exhausted, yet AFRINIC, which still has considerable IPv4 space, is attempting to further deplete the little that is left at other regions. Authors clarified that the incoming space will be from the IPv4 address transfer market, and not necessarily from the inventories of the other RIRs, which poses no harm to willing buyers and sellers as it is a free and open market.

  o Africa does not have many multinationals that need to consolidate their resources from other RIRs unless authors can present evidence with supporting examples, and that even then, there is no need for a dedicated policy for such multinationals.

- Some statements of support noted that:

  o In African IXP communities, some IXPs (like Kenya) have their prefixes in other RIR whois databases where they are unable to modify their records sometimes leading to challenges with law enforcement; this policy will help move those prefixes to the AFRINIC whois database where the holders can then set correct database properties. A reaction to this was that this was not a widespread problem, and that AFRINIC can deal with such IXPs on a case by case basis to correct that issue with the concerned RIR.

  o At some point, there is going to be a need for more IPv4 space in Africa, question being, at what point in time. Because the transfer market is the only way to meet such need when it does arise, there is a compelling case for a policy that allows inbound flow of IPv4 addresses. The author added that since the AFRINIC PDP takes a bit of time for a policy proposal to get accepted, the time is about now to consider an inbound IPv4 transfer policy because by the time it is implemented, there may already be limitations on how much IPv4 space that a member can acquire from AFRINIC because of the maximum allocation size constraints in the IPv4 soft landing policy, and a transfer market can potentially solve such a problem.

  o The proposed requirement to show proof of 50% utilization of IP resources be rephrased to simply demonstrate an intent to use since it is impossible for anyone to justify how they would for example, use 50% of an IPv6 pool.

Co-Chair Decision on Proposal - Inbound Transfers Policy:
No Consensus. Proposal goes back to the mailing list for further discussion.

5.0 Proposal: IPv4 Soft Landing Overhaul

Presented by Andrew Alston, Kris Seeburn and Mark Elkins

Highlights from the proposal:

o   The proposal seeks to overhaul the current IPv4 Soft Landing policy in its entirety due to its intent of postponing the usable lifetime of IPv4 space unnecessarily thereby slowing down IPv6 adoption on the continent.
o   AFRINIC should do away with the Soft-Landing methodology and let the pool exhaust naturally on the same needs-based allocation principles, but allow a /13 reserve for late and new entrants as the only measure moving forward.

The following comments were received from the floor opposing the proposal:

o   The problem statement of this proposal (getting rid of IPv4 to promote the uptake of IPv6) is inherently incorrect, and this cannot form the basis for a proposal that has the interests of the region, because IPv4 is still needed towards a smooth transition to IPv6, the same basis on which ICANN issued each RIR one (final) /8 (not based on RIR needs, but to ease possible transition to IPv6 among other technical reasons).
o   This is a crash-landing proposal due to the fact that it accelerates IPv4 depletion, a very scarce resource that is still needed by a growing internet industry for IPv6 adoption.
o   One of the co-authors is not consistent on the principle of accelerating IPv6 adoption by accelerating IPv4 depletion, due to the fact that in one of his proposals, the intent is to import more IPv4 space into the continent (hence delaying its depletion on the continent) yet in this proposal, the intent is to quickly deplete IPv4 space for a faster IPv6 uptake – which is contradictory.
o   The 102/8 (which is the last /8 as issued by IANA) was not needs based, but for managing the IPv6 transition period such that majority operators can get a block of IPv4 space to enable smoothly move to IPv6.
o   *RIPE NCC also has a provision for last /8 management, where new entrants can receive an IPv4 block from the last /8 to cater for their transition to IPv6.*

Co-Chair Decision on Proposal – Soft Landing Overhaul:
No Consensus. Proposal goes back to the mailing list for further discussion.

6.0 IPv4 Soft Landing BIS

Presented by Alain Aina and Omo Oaiya

Co-Authors made the following remarks:

- o There are two competing policy proposals and the co-authors recognize and acknowledge the difficulty in getting consensus on either of the two.
- o The proposal was already presented in Gaborone and all comments received were duly reviewed.
- o Co-authors therefore propose that moving forward, they would prefer to work with authors of the "Soft Landing Overhaul" proposal to establish a common problem statement and consequent policy proposal that fits within the long term best interests of the AFRINIC community.
- o If need be, as noted by CEO that Soft Landing may trigger in Q1 2017, it is possible to use the emergency provision of the PDP to move a unified proposal forward in an expedited fashion once both sets of authors converge on the problem statement and proposal.
- o Co-Authors requested that the proposal "IPv4 Soft Landing – BIS" go back to the mailing list for further discussion as a process is forged to collaborate on another proposal version.

Comments were received from the floor as follows:

- o The two groups should collaborate on a unified policy that is easy to understand, and consequently faster to implement by AFRINIC.
- o Authors of this proposal were commended for their willingness to collaborate.
- o Authors of the 'IPv4 Soft Landing Overhaul' proposal suggested that both groups withdraw their proposals for an effort to create a new proposal from ground up, and stated this is the condition on which they can work with the authors of the "IPv4 Soft Landing – BIS" proposal.
- o Authors of the "IPv4 SOFT LANDING Overhaul" proposal consequently withdrew it with the hope of working with the authors of "IPv4 SOFT LANDING BIS" towards a unified proposal.
- o It was suggested that the new proposal considers reducing the maximum allocation in phases 1 and 2 of the current soft landing policy while refining the provision for new entrants.
- o A new set of points was proposed from the floor as a potential unified problem statement

Co-Chair Decision on Proposal – IPv4 Soft Landing - BIS:
Proposal goes back to the mailing list for further discussion.

7.0 Proposal: Internet Number Resources Review by AFRINIC

Presented by Serge Ilunga, Arnaud Amelina, Jean Baptiste Millogo and Wafa Dahmani

Authors presented the following highlights from the proposal:

- It's acknowledged that Internet Number Resources, especially IPv4 space, are scarce and finite and that current distribution principles are based on operational needs, while avoiding stockpiling of those resources.
- Section 4 of the AFRINIC Registration Service Agreement (RSA) provides the framework for Investigations of resource usage while mentioning members' obligation to cooperate with the said investigations, and defines measures to be taken by AFRINIC in case of failure to comply with the RSA and policies.
- The lack of such investigations or regular control can lead to inefficient usage of the Number resources, stockpiling and other types of abuse.
- Proposal therefore provides a framework for AFRINIC to conduct regular reviews of resource utilizations held by members and to recover resources of members where usage is not in compliance with the RSA.
- Reviews shall be to establish compliance with both the RSA and Allocation/Assignment Policies, and can be random (initiated by staff) or reported (from a whistleblower).
- There shall be an appeal process to ensure that reviews are conducted transparently and neutrally – with an arbitration process developed by the AFRINIC Board, which involves publication of the process and the pool of arbitrators.
- The proposal provides for publication of compliance reports annually that lists members who have been reviewed (by membership category and resource type) along with their level of compliance.

The following comments against the proposal were received from the floor:

- Problem being solved by the proposal is not very strong or compelling.
- Audits can be expensive and time consuming - and this will strain AFRINIC significantly.
- The policy is open to significant abuse by competing business entities who can trigger random audits against each other (especially as the proposal does not intend to disclose the identities of complainants).
- If a member is reviewed and company details plus audit report is published online, the image of such a business would be defamed, and there may be litigation consequences, which could strain AFRINIC financially.
- The AFRINIC CEO remarked as follows:
  o Current audit practice is that some review is performed when a member applies for additional resources.
  o If AFRINIC received many cases leading to investigation and audit, this may attract significant cost although a few reasonable requests can be done without the need for an explicit policy on the issue.
  o If this policy passes as written, the CEO will recommend to the Board not to ratify

it due to the potential harm it may cause to the organization.

- The AFRINIC Board Chair clarified that the Board can elect to ignore or consider the CEO's recommendation not to ratify.
- The AFRINIC Legal Advisor noted that the RSA binds AFRINIC to confidentiality and protection of members' data by the laws of Mauritius and that publishing detailed member information in publicly available audit reports can bring AFRINIC under a legal spotlight with possible litigation, and advised that a policy should not bind AFRINIC to publish information that can lead to such situations.
- It was proposed that AFRINIC puts in place an operational and administrative method to receive complaints about policy violation, RSA breach or resource misuse – instead of going through the PDP.

The following comments in support of the proposal were received from the floor:

- Any policy proposal that ensures efficient and appropriate usage of number resources is necessary.
- If there is nothing to hide, there is no need to be afraid of competitor malice.
- The policy will improve quality of AFRINIC whois data, cause better transparency & community accountability.
- Since the RSA already empowers AFRINIC to do audits, this policy proposal provides clearer process to enforce existing RSA provisions, making it easy for AFRINIC staff.

Other RIRs were requested to inform the community regarding any existing audit practices in their regions, and if they are enforced through policy or administrative internal measures. RIR representatives responded as follows:

- RIPE NCC – There is a system in place (on their website) for reporting noncompliance with policy, and consequently carry out audits based on the contents of those reports received. The reports must be accompanied with proof. Some audit activities involve proactively reaching out to members to ensure that WHOIS records have correct data, and other audit activities involve detailed review and investigations. Such investigations can be triggered when a staff member suspects policy violation or when it's reported through the website. Results of investigations are not published. It was noted that 200 cases were reported/received so far in 2016, leading to 76 investigations.
- ARIN – The RSA provides for audits whenever there's IP space requested, fraud has been suspected or anytime at staff discretion. Audits are commonplace when there's suspicion of fraud or policy violation and this could lead to reclamation of resources. As an example, a suspected hijacking can be reported by anyone, and will lead to audit and investigations. The reporter (whistle blower) is not disclosed publicly however, neither is the detailed report of the investigation published.
- LACNIC – Only has policy provisions to check if a resource is being properly

utilized.
- *APNIC - no policy or RSA provision to do audits and investigations.*

More comments and feedback received on the proposal from the floor:

- If AFRINIC believes the policy is not needed, they should consider informing the community about ongoing audit activity, by some form of audit reports for a start because moving forward, WHOIS data accuracy is very important with respect to accountability to governments, law enforcement and other institutions within the community.
- The AFRINIC CEO was asked to inform the community whether AFRINIC has audited any members before and under what circumstances. He indicated that there have been audits when requesting additional resources, and these are always done when the additional resource request is received.
- The AFRINIC CEO was requested to share details of costs of such audits that AFRINIC currently conducts, so that this information can help authors towards refining the problem statement and other provisions in this proposal.

Co-Chair Decision on Proposal – Internet Number Resources Review by AFRINIC: Proposal goes back to the mailing list for further discussion.

8.0 Proposal: IPv4 Resource Transfers Within the AFRINIC region

Presented by Ali Hadji, Komi Elitcha and Alain Aina

Authors shared the following highlights from the proposal:

- Like all the other RIRs, AFRINIC will soon exhaust its IPv4 pool. A transfer policy is needed within the region to meet the needs of late resource requestors when the AFRINIC IPv4 pool is finally exhausted, and this policy proposal attempts to define the conditions under which such transfers can occur.
- Proposal is activated when Soft Landing in the current policy hits Phase 2.
- The source of the transfer must be a legitimate owner or the resource to be transferred, with no disputes.
- AFRINIC must ensure that transfers are needs-based, and a recipient must justify the need for the resource to be transferred.
- Staff concerns as shared in the assessment were addressed, since they were minor.

The following Comments (in support of the proposal) were received from the floor:

- Authors need to additionally clarify how Legacy IPv4 resource holders are impacted by this proposal since in principle, no policy applies to them.
- Instead of activating in Phase 2 of Soft Landing, the policy should take effect immediately, since AFRINIC is already projected to hit Soft Landing in Q1 2017.
- The condition about the source of a transfer being an AFRINIC member should be clearly reworded to also include an option that provides for Legacy Resource Holders to be able to transfer their resources.
- It was noted that *staff puts in place a pre-approval process for recipients of transfers, such that transactions can be quicker when a resource to transfer becomes available*.

There were no statements opposing the proposal.

Co-Chair Decision on Proposal – IPv4 Resource Transfers within the AFRINIC region: Consensus - Proposal moves to Last Call with requested modifications above added by authors into the proposal.

9.0 Open Policy Hour

Due to time constraints, the community requested that items lined up to be discussed during the Open Policy Hour be instead introduced for discussion on the mailing list by the Co-Chairs. The meeting adjourned at 1915 local time in Mauritius.

Summary of decisions on Policy Proposals discussed during AFRINIC25

Proposal	Decision	Comments
Inbound Transfers Policy	No Consensus	Back to the mailing list
IPv4 Soft Landing Overhaul	No Consensus	Withdrawn by authors thereafter
IPv4 Soft Landing - BIS	No Consensus	Authors to collaborate with authors of IPv4 Soft Landing Overhaul for a revised problem statement and proposal
Internet Number Resources Review by AFRINIC	No Consensus	Back to the mailing list
IPv4 Resource Transfers within the AFRINIC region	Consensus	Moves to Last Call with requested additions.