

RIR Reciprocity Assessments(External)

During the Policy discussions in the AFRINIC-32 PPM on 17 Sep 2020, there was a debate regarding the reciprocity of one inter-RIR transfer policy proposal with ARIN. AFRINIC contacted the other RIRs to get their response regarding the reciprocity of four policy proposals (The resource transfer policy draft 3) was received in September 2020).

The information received has been compiled in this document.

Policy Proposal Title	Resource Transfer Policy(draft 2)	Resource Transfer Policy(draft 3)
Policy ID	AFPUB-2019-V4-003-DRAFT02	AFPUB-2019-V4-003-DRAFT03
ARIN	ARIN does not find the proposed policy compatible with ARIN's Inter RIR transfer policy, as the statement "The source must be the current rights holder of the IPv4 address resources registered with any RIR and shall be in compliance with the policies of the receiving RIR." would require a source in the ARIN region to comply with AFRINIC RIR policies.	ARIN has responded that the Resource Transfer Policy is not compatible with their inter-RIR transfer policies because of the following statement therein - "The source must be the current rights holder of the IPv4 address resources registered with any RIR and shall be in compliance with the policies of the receiving RIR." would require a source in the ARIN region to comply with AFRINIC RIR policies.
APNIC	Since version 2 has the same text as version 3, hence not compatible	The APNIC inter-RIR policy is not compatible with the current text, especially "The source must be the current rights holder of the IPv4 address resources registered with any RIR and shall be in compliance with the policies of the receiving RIR."

<p>RIPE NCC</p>	<p>Paragraph 5.7.5 "Procedure of the resource transfer" states that the transferring party will submit a transfer request to the receiving RIR (Not the offering) and the receiving RIR will notify the transferring RIR once it approves the transfer.</p> <p>This is not in line with how INTER-RIR transfers were set up in any of the other RIR and it is not in line with RIPE NCC due diligence and procedural documents.</p>	<p>Section 5.7.5 makes the policy not compatible with the RIPE policies and procedures and not possible to implement.</p> <p>For Transfers from AFRINIC to RIPE NCC:</p> <p>Since this policy states that the transferring party needs to contact the RIPE NCC. The RIPE NCC can not verify if he is the actual holder of the resources or if these resources comply with the policies in AFRINIC.</p> <p>(This is a requirement of the RIPE Policies)</p> <p>The RIPE NCC procedure states: "For transfers to the RIPE NCC service region, the RIPE NCC will be notified by the relevant RIR and contact the relevant party within the RIPE NCC service region."</p> <p>For Transfers from RIPE NCC to AFRINIC:</p> <p>The policy states that the transferring party should contact the receiving RIR (AFRINIC in this case). This is not compatible with the RIPE Policies which state that when transferring Internet number resources to another RIR, the RIPE NCC will follow the transfer policies that apply within its own service region.</p> <p>The RIPE NCC procedures state: "The transfer request is always initiated by the transferring party. The transferring party must send a request to the RIR where the Internet number resources are registered at the moment the request is made."</p>
<p>LACNIC</p>	<p>Since version 2 has the same text as version 3,</p> <p>First of all, LACNIC doesn't demand reciprocity in the inter-RIR policy. However, there are some aspects which are important to consider:</p> <p>1. "The source must be the current rightful holder of the IPv4 address resources registered with any RIR, and shall be in compliance with the policies of the receiving RIR"</p> <p>LACNIC's policy manual doesn't request to the source organization to be in compliance with the other RIR policies. It wouldn't have much sense to request that.</p> <p>2. Paragraph 5.7.5 "Procedure of the resource transfer" states that the transferring party will submit a transfer request to the receiving RIR (Not the offering) and the receiving RIR will notify the transferring RIR once it approves the transfer".</p>	<p>First of all, LACNIC doesn't demand reciprocity in the inter-RIR policy. However, there are some aspects which are important to consider:</p> <p>1. "The source must be the current rightful holder of the IPv4 address resources registered with any RIR, and shall be in compliance with the policies of the receiving RIR"</p> <p>LACNIC's policy manual doesn't request to the source organization to be in compliance with the other RIR policies. It wouldn't have much sense to request that.</p> <p>2. Paragraph 5.7.5 "Procedure of the resource transfer" states that the transferring party will submit a transfer request to the receiving RIR (Not the offering) and the receiving RIR will notify the transferring RIR once it approves the transfer".</p> <p>This is not in line with how INTER-RIR transfers were set up in any of the other RIR.</p>

Policy Proposal Title	AFRINIC Number Resources Transfer Policy
Policy ID	AFPUB-2019-GEN-002-DRAFT02
ARIN	<p>3.3.3 If source is Legacy holder and recipient is in another region, then allow "Legacy" for transfer.</p> <p>3.3.4 If source is AFRINIC member and recipient is in another region, then allow "Global" for transfer.</p> <p>Others == Global</p> <p>3.1.4 "Others" means resources transferred from other regions through Inter-RIR transfers.</p> <p>Infers "Only Legacy resources and resources transferred in from other regions will be transferable out of the AFRINIC service region."</p> <p>ARIN considers the NRPM 8.4 requirement for "reciprocal" Inter-RIR transfer policies to require substantially the same categories of number resources to be transferrable by policy.</p> <p>If this provision allows general inward transfer of number resources from ARIN-region entities but prohibits the transfer out of some categories, then this aspect of the proposal is not reciprocal with ARIN, as ARIN does not have a restriction on outgoing Inter-RIR transfers (apart from those resources in our reserved pools.)</p>
APNIC	<p>3.3.3 If source is Legacy holder and recipient is in another region, then allow "Legacy" for transfer.</p> <p>3.3.4 If source is AFRINIC member and recipient is in another region, then allow "Global" for transfer.</p> <p>Others == Global</p> <p>3.1.4 "Others" means resources transferred from other regions through Inter-RIR transfers.</p> <p>Infers "Only Legacy resources and resources transferred in from other regions will be transferable out of the AFRINIC service region."</p> <p>Not compatible as it is not fully reciprocal and bi-directional in nature. The proposal only allows transfer of legacy resources and resources that been transferred into AFRINIC, and NOT resources from the AFRINIC pool. In principle, APNIC allows outgoing transfer of resources from the APNIC pool, but has a 5-year transfer restriction for 103/8 space.</p>
RIPE NCC	compatible and reciprocal with the RIPE NCC's inter-RIR transfer policy.
LACNIC	First of all, LACNIC doesn't demand reciprocity in the inter-RIR policy. No comments

Policy Proposal Title	IPv4 Inter-RIR Resource Transfers (Comprehensive Scope)
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Policy ID	AFPUB-2019-IPv4-002-DRAFT04
ARIN	<p>This proposal would be compatible with ARIN policy as written. 5.7.2.2 language does not always explicitly state that the source entity requirements apply solely to source entities, but this proposal is compatible with or without that clarification.</p>
APNIC	<p>Compatible for IPv4 Inter-RIR transfers. However there is ambiguity about APNIC to AFRINIC ASN transfers. We understand the text below allows transfer of ASNs out of AFRINIC region if they meet certain conditions. Does it imply transfer of incoming ASNs into AFRINIC is allowed?</p> <p>"5.7.4 Transfer of ASN with IPv4 Resources</p> <p>At the AFRINIC discretion, in the case where over 50% of the IPv4resources associated with an ASN are being transferred, that ASN may also be transferred at the same time."</p>
RIPE NCC	<p>compatible and reciprocal with the RIPE NCC's inter-RIR transfer policy.</p>
LACNIC	<p>First of all, LACNIC doesn't demand reciprocity in the inter-RIR policy. However, there are some aspects which are important to consider:</p> <ol style="list-style-type: none"> 1. In section 5.7 IPv4 Resources transfers "This policy applies to an organization with a justified need for IPv4 resources (recipients) and organizations with IPv4 resources which no longer need (sources). " <p>Our procedure doesn't demand to ask the recipient the reasons for the transfer, we don't interfere in that part.</p> <ol style="list-style-type: none"> 2. The policy says: "5.7.4 Transfer of ASN with IPv4 Resources". However, LACNIC policies only allow IPv4 transfers.