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From: Louis Lee

To: ICANN Board and ICANN Staff

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 Internet Assigned Numbers Authority (IANA) Policy for Allocation of ASN Blocks to Regional Internet Registries

## 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 15 April 2014 wrote to the ASO Address Council seeking guidance on the interpretation of the Global Policy for Internet Assigned Numbers Authority (IANA) Policy for Allocation of ASN Blocks to Regional Internet Registries, which was ratified on 12 September 2010.

The request specifically stated the following:

The RIRs have raised a question about allocations of AS Numbers to the RIRs and whether their holdings of 16-bit AS Numbers can be set to one side when evaluating a request for additional AS Numbers from the IANA AS Numbers registry.

## The policy says:

"This means until 31 December 2010, RIRs can receive two separate ASN blocks, one for 16-bit ASNs and one for 32-bit only ASNs from the IANA under this policy. After this date, IANA and the RIRs will cease to make any distinction between 16-bit and 32-bit only ASNs, and will operate ASN allocations from an undifferentiated 32-bit ASN allocation pool."

Our questions include (but are not limited to):

- 1. Does this give ICANN any flexibility to still allow RIRs to maintain a separate 16-bit pool when evaluating AS Number requests?
- 2. How does this policy relate to regional policy, if at all?

This is the 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 Allocation of ASN Blocks to Regional Internet Registries as follows:

1. When judging if an RIR is eligible to receive (an) additional ASN block(s) from the IANA per section 3, the IANA must consider utilization of the total undifferentiated pool of ASNs that contains both 16-bit ASNs (ranging from 0-65535) and 32-bit only ASNs (ranging from 65536 - 4294967295).

2. How RIRs manage their undifferentiated pool is within each RIR's consideration per their operating procedures and policies.

Note that treating the 16-bit ASNs (ranging from 0-65535) and 32-bit only ASNs (ranging from 65536 - 4294967295) differently could lead to a condition where one portion of the undifferentiated pool is completely utilized, while the other portion is underutilized causing the total utilization to be low enough to prevent the RIR from being eligible for additional ASNs.

3. The ASO AC would like to reaffirm its advice given in June 2013 that "There is no requirement in the policy to form the block of 1024 AS Numbers from a contiguous set of numbers, thus allocating from 2 or more different value-ranges is acceptable."

Per this advice, the past practice that an RIR has the option of requesting a block of 1024 AS Numbers that consists of a non-contiguous block of a specific amount of 16-bit ASNs (ranging from 0-65535) and 32-bit only ASNs may continue.

Best Regards, Louie Lee Chair, ICANN ASO Address Council