STAFF ASSESSMENT: Abuse Contact Policy Update - v3

Proposal	AFPUB-2018-GEN-001-DRAFT03
Title	**Abuse Contact Policy Update – v3**
Proposal UR	https://www.afrinic.net/policy/2018-gen-001-d3#proposal
Assessed	**20 July 2019**

1.0 Staff Understanding of the Proposal

a. Replacement policy text to current CPM 8.0 (Abuse Contact Information) - *[sec 8.1]*
b. Introduces a mandatory "abuse-c" attribute in inetnum, inet6num and aut-num whois database objects. The value of this attribute is an e-mail address (abuse-mailbox), to which all abuse related information shall be sent. The abuse-mailbox is optional in child objects of parent direct allocations or assignments issued by AFRINIC - *[sec 8.2]*
c. The abuse-mailbox must be valid and actively monitored through period verification - *[sec 8.2]*
d. Email sent to the abuse-mailbox must need manual intervention by the recipient **at some point** - *[sec 8.3]*
e. AFRINIC must provision a system to validate the abuse-mailbox. The actual process is left to AFRINIC staff discretion, but could follow an example procedure in sec 3.2 of the policy proposal, with a recommended minimum validation interval of at least once every 6 months - *[sec 8.4]*
f. Abuse-c mailboxes that fail validation tests will lead to eventual **blocking of certain services**, at AFRINIC discretion (**and in accordance with the relevant policies/procedures**) - *[sec 8.5]*
g. An escalation mechanism to AFRINIC must be provided where any concerns with the validation process can be reported by community and/or members. This can also help with manual re-validations. - *[sec 8.6]*

2.0 Staff Comments

a. There is already an existing solution through the **IRT object**, which is currently optional - (and which seems to address the intent of the proposal) - which can be made mandatory for directly issued resource objects by AFRINIC. An added advantage of using the IRT is that it can hold more information than just an e-mail address, such as physical address, phone numbers and PGP keys for secure communication.
b. During the AFRINIC30 Public Policy Meeting, the author clarified that the IRT can be an 'alias' of the abuse-c. We note however that it is confusing to use IRT as an alias to the abuse-c and the other way round - we would not know how to implement such a requirement unless the author guides with detailed specifications through the policy proposal or through the (DBWG) database working group.
c. In proposed 8.5 where abuse-c mailboxes that fail validation tests will lead to eventual **blocking of certain services**, at AFRINIC discretion (**and in accordance with the relevant policies/procedures**). The policy proposal needs to be clear on what specific services shall be blocked. However, it's important to note that without this clause in the first place, a breach of the policy (such as lack of valid abuse-c if this proposal were to pass) amounts a breach of the RSA, which can lead to eventual revocation of the same RSA and associated services.

3.0 Legal Observations

None

4.0 Implementation:

4.1 Timeline & Impact: About 6 months of software development work.
4.2 Implementation Requirements: Modifications to WHOIS codebase depending on the solution that will eventually be ratified.