

STAFF ASSESSMENT: Abuse Contact Policy Update

Proposal	AFPUB-2018-GEN-001-DRAFT02
Title	Abuse Contact Policy Update
Proposal URL	https://www.afrinic.net/policy/2018-gen-001-d2#proposal
Assessed	20 April 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 - [sec 8.2]
- d. Email sent to the abuse-mailbox must need manual intervention by the recipient - [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 - [sec 8.4]
- f. AFRINIC must block MyAFRINIC access for non-complying members. All functions in MyAFRINIC other than updating the abuse-mailbox shall be blocked until the abuse-mailbox has been successfully validated. - [sec 8.5]
- g. An escalation mechanism to AFRINIC (such as through an email address) 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. In proposal text 3.2, "After this proposal is implemented, AFRINIC will publish the IRT also as abuse-c, in order to facilitate the search in whois for the same information, regardless if looking for abuse-c or IRT..." The proposal should be clear of the exact solution in EITHER the abuse-mailbox (with an email address) and/or an IRT object. The IRT is currently a value of the "mnt-irt" attribute. It is not clear if the "IRT" should be a value for the abuse-c attribute, or if the "abuse-mailbox" referenced in an "irt" should be the value of the abuse-c attribute, or if the "mnt-irt" attribute should be renamed to "abuse-c". In any case, the proposal needs to be clearer on one solution, but we recommend maintaining the IRT and making it mandatory.
- c. In proposed 8.5 where MyAFRINIC access to members with invalid abuse contacts is blocked, the blocked accounts would be unable to vote at the AGMM or other elections requiring the members to vote online, as this is done through MyAFRINIC. (Legal Adviser's opinion in Sec 3.0 below). The proposal though is not clear about the meaning of "blocking of that account's access to its resources". We suggest re-wording to specify that no database objects (including WHOIS and IRR objects) may be edited except to an add abuse-c or abuse-mailbox. If the author intends voting to be blocked, the punitive measure is certainly disproportionate to the offence, but is not an illegal act in Mauritius law.
- d. In proposed 8.6, it's better to not specify an email address (for manual interventions and escalations), as this could change. It's better to reword like "AFRINIC should provide a method to report or escalate.. invalid abuse email addresses"

3.0 Comments from Legal Adviser

Non-compliance with an administrative obligations such as updating of contact information cannot be construed as such a serious offence to warrant the blocking of access which would lead to loss of voting rights. This ultimate sanction is disproportionate with the non-compliance and should be reviewed. It is not however an illegal act in Mauritius law.

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.