

Staff Impact Assessments

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AFRINIC
The Internet Numbers Registry for Africa



ORGANISED BY

AfNOG
African Network Operators Group

Abuse Contact Policy Update

AFPUB-2018-GEN-001-DRAFT07

Staff Interpretation & Understanding of the proposal



This policy proposal requests AFRINIC to implement proper abuse-c contact and abuse-mailbox.

<https://afrinic.net/policy/proposals/2018-gen-001-d7#impact>

Impact

4.1 Impact on Registry Functions

1. If this proposed policy reaches consensus, an improvement on the accuracy and currency of registry data is expected, as the “abuse-mailbox:” attributes are expected to be current and correct. This will also reduce the number of abuse emails that are currently directed to AFRINIC queues due to lack of abuse contacts.

2. MS procedures will require updates as follows:-

New procedure/sub-process to be developed for the validation of the abuse-c/abuse-mailbox.

Impact

WHOIS

- The abuse-c shall be a person/role object on the WHOIS database. abuse-mailbox is already an attribute of the person/role object.
- The abuse-c attribute shall be added on the WHOIS database as an attribute to inetnum, inet6num and aut-num objects
- Deprecate IRT object
- Remove mnt-irt attributes from inetnum, inet6num and aut-num objects.
- Add validation rules to force abuse-mailbox on person and role objects which are referenced via the abuse-c attribute.
- A WHOIS query of the inetnum, inet6num and aut-num shall provide the abuse contact in the response.

Impact

MyAFRINIC

- a. Coding will be required to ensure creation/updates/import of abuse contacts
- b. Abuse contacts shall not have login credentials on MyAFRINIC unless if it is being used in another role as well and hence will be maintained by admin/tech contacts
- c. Update of the resource issuance/update business rules to make abuse-c mandatory for all
- d. Updates of the sub-allocation and assignment forms with business rule around abuse-c
- e. A tool to validate the mailboxes as mandated by this policy proposal will have to be implemented and abuse contacts flagged as valid/invalid
- f. A tool to enable members to implement the abuse-c will be developed.

Impact

Object	Count in WHOIS DB	Protected by mnt-irt
Inetnum	139268	232
Inet6num	31230	33
aut-num	1915	32

Member organisations: 28 Out of a total of 1857 resource members have adopted the current abuse contact policy and 27 IRT objects (out of 42 IRT objects created in the whois db) are referenced in their resources on the whois database.

Impact

Financial Impact

No impact

Legal impact

In case this policy reaches consensus, non-compliance with this policy by an AFRINIC member will be considered a breach of the RSA clause and the member will be encouraged to remedy the breach. Persistent non-compliance may entail revocation of the RSA as per the clause.

Implementation

AFRINIC shall update its current whois database accuracy initiatives with its members with the abuse contact adoption

The AFRINIC team shall implement the policy in a phased approach and keep the community informed about progress

General Abuse Contact

AFPUB-2020-GEN-005-DRAFT01

Staff Interpretation & Understanding of the proposal

This policy proposal requests AFRINIC to implement an abuse-c contact (similar to existing admin-c and tech-c) for Autonomous System Numbers.

<https://afrinic.net/policy/proposals/2020-gen-005-d1#impact>

Clarification Requests

AFRINIC Clarification Requests

- a. Author, to clarify if the removal of Section 8 of the CPM implies that the IRT object should be deprecated from the AFRINIC whois database?
- b. The proposal as worded will not ensure that inet(6)nums will not contain an abuse-c. Author to clarify if this is what the proposal aims to achieve.

Clarification Requests

AFRINIC Clarification Requests

c) The proposal as written contains some statements that are not comprehensible and can easily lead to erroneous interpretations & implementation concerns as follows

"Section 8.X does not offer a valid method on how to host reports about not working and not specific objects." , "This addition will allow the system to return to errors if someone creates an object without the mandatory contact attribute, which means that if something goes wrong (creating an object without the mandatory contact attribute) while the members report abuse, the system will return an error to inform the user. If the policy has specific parameter requirements, the system will also report an error if they are not correct." , "The abuse contact("abuse-c") should be a person who can handle abuse issues on the network, and it is for the network to communicate with each other on abuse issues."

Clarification Requests

AFRINIC Clarification Requests

d) Authors mention that "The current policy fails to improve data accuracy in the WHOIS database and compliance for what concerns addressing issues." How will this proposal as written improve data accuracy in the WHOIS database and compliance for what concerns addressing issues?

e) Can an aut-num have more than one abuse-c contact? This clarification is required for the purpose of determining if the abuse-c on an aut-num object will be:

abuse-c: [mandatory] [multiple] [inverse key] OR abuse-c: [single] [multiple] [inverse key]

Impact



Processes

- Process reviews will be required to ensure that abuse-c information is received for the ASNs.
- A proper migration plan for those members currently using IRT in case the authors state that the proposal's removal of section 8 entails deprecating IRT.

Systems - WHOIS

A new mandatory attribute abuse-c will be required for aut-num objects.

IRT object phased deprecation(if clarified by authors)

Systems - MyAFRINIC

Coding updates to add the abuse-c to the ASN forms

Impact



Impact on Resource Holders

1738 Resource Members that have ASNs delegated to them @May 2021 will be requested to comply with this policy by providing their abuse-c contact.

New members will be required to provide their abuse-c at the time of membership application

Impact



Financial Impact

No impact

7. Legal impact

The legal Team advises on the need for compliance with the Data Protection Act (DPA) in case personal data of the abuse-c are intended to be published on the WHOIS database. Alternatively, in order to ensure full DPA compliance, the authors may consider specifying the need for role-based email addresses so that no individual (data subject) may be identified through email addresses being adopted for that purpose.

Implementation

Implementation timelines

The proposal as written contains a number of an unclear implication that needs to be clarified. If implemented as drafted, would result in operational issues based on varying interpretation.

RPKI ROAs for Unallocated and Unassigned AFRINIC Address Space AFPUB-2019-GEN-006-DRAFT03

Staff Interpretation & Understanding of the proposal

- This proposal requires AFRINIC to create ROAs with origin AS0 for all its unallocated and unassigned IPv4 and IPv6 address space that it currently administers. unallocated and unassigned space here means available and reserved space as per the AFRINIC extended delegated stats file.
- New prefixes received from IANA/PTI would immediately have AS0 ROA's.
- Any prefixes returned by or reclaimed from members will also have AS0 ROAs only at the end of the reclamation process
- When AFRINIC allocates address space to one of its Resource Members, the RPKI ROA or ROAs with origin AS0 covering the space will first have to be revoked AND not be visible in the repositories, before the allocation/assignment can happen.
- The process for ROA validity periods and release of ROAs before assignment/allocation by AFRINIC is left for AFRINIC staff to define in internal procedures.

Impact



Registry Functions

- An upgrade of the AFRINIC inventory management system will be required in order to implement this policy
- Automation of the creation of AS0 ROAs for resources currently unallocated in its inventory as well as incoming resources (either from resource reclamation, returns or replenishment of its pool from IANA/PTI)
- Adjustments of resource issuance process as well as timeframes to ensure that ROAs are revoked and that the revoked ROAs are removed from the validators repositories before the resources are issued.
- An update on AFRINIC systems interfaces & internal controls used for resource & transfer management will be required

Impact

- Improve overall monitoring to ensure that members do not consistently create ROAs with AS0 with the prefixes they need to announce in compliance with the policies under which they received these resources.
- Existing policies implemented or undergoing implementation will be put into consideration so that a check is run to determine which prefixes' usage does not require an announcement in global routing
- Member documentation for ROAs management shall be updated

Impact

- **Legal Assessment**

No comments

- **Financial Assessment**

No CAPEX will be required for the implementation of this policy proposal.

Impact

RPKI

On the RPKI side, 3 options have been scoped notably,

- a. Use the existing AFRINIC RPKI Tree
- b. Additional Production certificate (0/0) for unallocated space only
- c. New Trust Anchor with a single Production Certificate

Implementation

AFRINIC has planned the migration to myafrinic v2 in Q4-2021. The AFRINIC inventory of unallocated and unassigned resources will be integrated on the myafrinicv2 platform and the technical team will be able to implement the AS0 ROAs on them.

We have been advised that the policy can be fully implemented by Q2-2022.