

prop-171-v001:
Operational Accountability for Abuse Contacts in
Sub-Allocated Address Space

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The Problem

APNIC already requires IRT/abuse contacts to be reachable and periodically validated (prop-125). But in sub-allocation scenarios, the registered contact may not be the operator that actually controls the affected network. So the email can be successfully delivered, yet the abuse issue may still go unresolved.

The status of the RIRs

Region	Abuse contact validation	Operational accountability (prop-171)
APNIC	Every 6 months	Proposed
RIPE NCC	Annually	No
LACNIC	At least twice yearly	No
ARIN	Annually	No
AFRINIC	Reachability-oriented framework	No

Key distinction

Reachability $\neq$ Accountability.

A working mailbox does not necessarily mean there is an effective operational path to the person who can investigate and act.

e.g. ISP sub allocated the IP address to their customer.

Proposed Policy Solution

When address space is used by a downstream organisation, the upstream holder must ensure a reliable operational path from the registered abuse/IRT contact to the party that can actually investigate and resolve the report.

Abuse Report

- Registered Abuse / IRT Contact
- Reliable Operational Path
- Responsible Downstream Operator
- Investigation / Resolution

How Can the Requirement Be Met?

Model	How it works
A. Direct downstream contact	The registered abuse/IRT contact is operated directly by the downstream organisation.
B. Centralised upstream handling	The upstream holder receives the report, identifies the responsible downstream party, and forwards it reliably.
C. Other effective arrangement	Any other model is acceptable, as long as legitimate reports reach the responsible party without undue delay.

Be clear about what it does not do

The proposal does not require every downstream customer's contact details to be published. It does not mandate one specific abuse-handling model, change the existing IRT validation cycle, or turn APNIC into an abuse investigation or enforcement body.

Advantages & Disadvantages

Benefit: stronger operational accountability

Cost: some additional process and administrative work

Networks that make sub-allocations may need to review their internal escalation processes or registry information, while APNIC may need to provide clearer operational guidance.

“Prop-171 is not about making APNIC police abuse. It is about making the existing abuse-contact system operationally meaningful. Not just reachable, but actionable.”