

Resource Delegation Audit Program Q1 2025 Update

APNIC AGM

27 February 2025

Before we start: Key Principles

- Trust and accuracy is critical to the operation of a registry
- All number resource delegations and transfers must be made in strict adherence to community-developed policies
- APNIC has zero tolerance for the misallocation of resources in its registry or those of NIRs
- APNIC's identification of any delegations that contain questionable common elements are preliminary findings only. They should not be taken to infer that the delegations are fraudulent or that there has been any improper actions taken by Members or registry staff

Delegation Audit Program

Primary Activity

- Aggregated data analysis (APNIC and NIRs)

Supporting Initiatives

- Policy compliance spot checks (APNIC)
- Policy and procedure review (APNIC)
- Account accuracy review (APNIC)
- NIR support + training (APNIC)
- NIR agreement review (APNIC and NIRs)

Background – 2024 Activity

- APNIC's planned delegation audits began in 2024
 - Investigated anonymous report on questionable delegations from IRINN
 - Preliminary audit of IDNIC data (5 years) identified questionable delegations
- Cooperative actions taken
 - APNIC's analysis is of the data it can see. Further investigation requires NIRs' own registry and account data (not accessible to APNIC)
 - IRINN investigated and recovered 44 IPv4 delegations
 - IDNIC appointed independent law firm to investigate 1,216 delegations identified by APNIC's audit
- Thanks to Dr Devesh Tyagi (IRINN CEO) and Muhammad Arif Angga (APJII Chair) for their cooperation

2025 Progress: IDNIC Update

- APJII-appointed law firm, Romulo Silaen & Partners, began its investigation on 6 January 2025 of the preliminary audit data
- Contact and business registration data checks of the organizations receiving space completed
 - Those with inconsistencies / missing information being contacted
- Examination of delegations with common connections and data points to determine any non-compliance
- Next progress update will be provided in Q2

2025 Progress: Aggregated Data Analysis

- All allocation and transfer data for a period of ~10 years
- First audit in 2025 was conducted on JPNIC data - no adverse findings
- Remaining NIRs and APNIC's own registry to follow
- Aim to complete audits for each of the NIRs by the end of 2025
 - Timing may vary depending on audit findings

2025 Progress: Supporting Initiatives

- Account accuracy review
 - Proactively assist Members to ensure registry data is accurate
 - Process to be completed during Q2, implementation from Q3 2025
- Policy and procedure review
 - Review of all of APNIC resource delegation processes, workflows, and team structures
 - To begin in March
- Policy compliance spot checks on new APNIC delegations now underway
- NIR support + training
 - Quarterly NIR alignment meetings
 - Support and training provided as needed
- APNIC – Standard NIR agreement review
 - To be commence in Q4 2025

Community Reporting

- Updates on the audit program will be reported to the EC and community quarterly
 - apnic.net/resource-audit
 - At the AGM and AMM
- Any discoveries of significance will be reported out-of-cycle
- Next report: June 2025

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