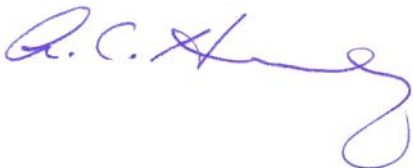**ESNA Review**
Information Economy
Department of Communications, Information Technology and the Arts
GPO Box 2154
Canberra ACT 2601

To whom it may concern,

please find attached ACIF's submission in response to the Australian government review of the E-Security National Agenda

Yours sincerely,

Anne Hurley
Chief Executive Officer
Australian Communications Industry Forum (ACIF)

AUSTRALIAN GOVERNMENT REVIEW OF THE E-SECURITY NATIONAL AGENDA
ACIF SUBMISSION

1   INTRODUCTION

The Australian Communications Industry Forum (ACIF) is pleased to have this opportunity to make a submission to the Government's review of the E-Security National Agenda.

ACIF was established in 1997 to provide communications industry leadership for the promotion and development of industry-led outcomes that foster competition and innovation, while protecting the consumer. See further: www.acif.org.au.

ACIF operates on the central premise that the best outcomes for all stakeholders in Australian telecommunications can be achieved by co-operation. In this context, ACIF supports the policy objective of the *Telecommunications Act 1997* to promote the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.

Formed as a company limited by guarantee and a not-for-profit membership-based organisation, ACIF is ideally placed to reflect and respond to the dynamics of the telecommunications industry.   Its membership comprises carriers/carriage service providers, business and residential consumer groups, industry associations and individual companies.

ACIF's submission provides a general response to some of the matters in the Discussion Paper. In addition, we have taken this opportunity to summarise a number of ACIF's strategic initiatives that align with, and complement, the government's e-security agenda.

2   ACIF'S STRATEGIC FRAMEWORK: LEADING THE INDUSTRY INTO THE NEXT GENERATION OF CONVERGING NETWORKS, TECHNOLOGIES AND SERVICES.

In November 2005, DCITA released its report to the Minister examining policy and regulatory options associated with Voice over Internet Protocol. In that report, [1]Recommendation 3 was produced and requires the development of a strategic framework to guide the transition to next generation networks.

As a result of R3, ACIF has commenced initial planning to scope a strategy that will drive the Australian telecommunication industries' transition to next generation networks.

Part of this strategy will see ACIF increasing its emphasis on working collaboratively with all industry stakeholders to pro-actively identify the issues to be addressed in emerging technologies and services, and to respond with appropriate industry-developed solutions.

The framework will encompass commercial, technical and operational issues relating to the NGN transition; and e-security will be a common theme that will be tackled in discussions, stakeholder engagement and throughout strategic initiatives associated with the industries' transition to next generation networks.

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[1] Refer to Attachment One

ACIF would be happy to offer our services to help coordinate complementary exercises along with DCITA, in relation to e-security.

3   SERIES OF INFORMATION SESSIONS – 'FUTURE FORUMS'

Our top priority throughout this NGN transition is to encourage maximum cooperation between all of the participants. A first phase of the strategic framework will see ACIF convene a series of open industry information sessions. These information sessions will include the involvement of a broad range of stakeholder groups so that sufficient insight can be gained to help inform and progress the transition strategy to NGNs.

4   FORMAT

The information sessions will initially be held in four parts and will encompass topics concerning:

- fibre and copper (including fibre to the 'x');

- wireless technologies (includes wimax, wi-fi, etc);

- mobile technologies (includes 3gsm 850 wcdma/hsdpa); and

- alternate infrastructure technologies (includes Broadband over Powerline 'BPL').

5   EXAMINATION OF ISSUES

We expect that the content of the series will focus broadly on inter-operator and access issues and e-security will be a topic that will be part of those discussions.

6   STAKEHOLDER GROUPS

The sessions will build on the successful format adopted for ACIF's December 2005 VoIP forum. The following stakeholder groups were each presented with an opportunity to share information. The groups included:

- Regulatory

- Technical

- Operational

DCITA, ACCC and ACMA have all indicated their positive support for this initiative.

7   INTERNATIONAL FOCUS

The NGN world does not respect many of the borders we have been able to apply to our industry in the past. International policy and collaboration is a critical component to future focus.

Therefore, ACIF's strategic planning will include an international focus to make sure Australia is aligned with the rest of the world. ACIF is mindful that the overall NGN framework is aligned with the rest of the world. To that end, ACIF discussion papers, as appropriate, will be released overseas to seek international feedback.

8   ACIF'S VOIP RELATED INITIATIVES AND E-SECURITY

Emerging NGN services like VoIP have been factored in to our strategic planning. ACIF has taken a proactive leadership role in bringing the industry together to initiate strategies that address issues before they become problems and we are already adopting new ways of addressing NGN and VoIP issues.

In the past, we might have referred them to a committee, which would have spent months or years analysing every aspect, eventually developing a set of industry codes and technical standards.

That worked quite well when technology lifecycles were measured in five or ten year blocks. In the NGN world, even the concept of a "lifecycle" is disappearing because e-security threats, technologies, and services are in a state of perpetual mutation.

Instead of developing new codes and standards that could be outdated as soon as they are published, ACIF is tackling VoIP and NGN differently and e-security features in this work.

For example, we have developed a number of fact sheets that provide basic information about VoIP for service providers and their customers. It is fair to say that ACIF is increasing its education and awareness raising activities.

The first fact sheet gave basic information to help consumers make more informed decisions about buying VoIP services.

The second fact sheet gave the VoIP providers a set of instructions on what they needed to do to help emergency services pinpoint the source of a VoIP call.

The third VoIP fact sheet is designed to alert VoIP providers and ISPs about security issues they need to address. It highlights some of the ways VoIP calls, networks and systems can be vulnerable to malicious or criminal attack.

As well as advising providers about the need to safeguard their own infrastructure, the fact sheet also suggests they educate their customers on the need to take precautions.

The VoIP Security Fact Sheet can be downloaded from the ACIF website at http://www.acif.org.au/documents_and_lists/factsheets.

The VoIP Security Fact Sheet, was suggested by participants at the ACIF VoIP Forums in 2004 and 2005 respectively.

9   2006 VOIP FORUM

In December 2006, ACIF will be holding its 3rd VoIP Forum. A feature of this forum, as the previous two, will be the inclusion of discussions surrounding the e-security environment.

Further information about the 3rd Annual ACIF VoIP Forum will be provided closer to the time. ACIF is keen to include e-security on the agenda and will seek DCITA's input and engagement when planning commences.

10   VOIP WORKING GROUP

The ACIF VoIP Working Group is identifying and progressing issues relating to VoIP. Membership is drawn from interested sectors, including industry, consumer and regulatory organisations. The Working Group meets every month and will continue to monitor and address issues identified and to consider new issues.

Work is being progressed through a variety of ways, including sub-groups, the development of discussion papers, and referral to ACIF Reference Panels as appropriate. Issues under consideration frequently include matters of e-security.

11   ACIF'S SUBMISSION INTO THE REVIEW OF THE SPAM ACT 2003

ACIF understands that the scope of this review does not incorporate the separate process being conducted under review of the Spam Act 2003. However, it is worthwhile noting that in February 2006, ACIF had the opportunity to make a submission to the legislative review of the operation of the Spam Act 2003 and related parts of the *Telecommunications Act 1997*.

ACIF's submission commented on the policy intent of the Telecommunications Act 1997 of 'maximum use of industry self-regulation' is, in essence, a mandate for industry to take responsibility for its own outcomes. Industry has demonstrated its commitment to this task through its responses to furthering the objectives of the Spam Act.

ACIF' submission also highlighted the importance of promotional, educational and awareness-raising activities associated with Spam and considered that consumer and industry benefits would be gained by the development of an ACIF Industry Spam Guideline. Such a Guideline would help Suppliers comply with their legal and regulatory obligations by consolidating the various requirements contained in existing regulations and publications and capturing them in a single, user friendly Industry Guideline.

Such initiatives would raise the profile of what Suppliers were doing in relation to the reduction or elimination of Spam. This would send a strong message to consumers and overseas players that Australian Suppliers will not tolerate their Networks being used for illegal purposes.

Similarly, e-security is another instance of where supplier networks may be vulnerable. ACIF again welcomes the opportunity to work with the Government on the development of awareness raising material to help suppliers protect their networks from threats to e-security.

ACIF would willingly participate in any initiatives funded by DCITA relating to e-security.

12   CLOSING

The range of NGN issues that ACIF has and will be tackling can only be resolved by cooperative outcomes, with the industry itself taking ownership and accountability.

The policy of the *Telecommunications Act 1997* is to promote the primacy of industry self-regulation. ACIF's lengthy experience and substantial involvement in leading

pro-active outcomes to next generation network issues, means it is well placed to play in role in leading industry solutions, which include matters of e-security.

ACIF would be happy to offer its services to help coordinate complementary exercises along with DCITA, in relation to e-security and welcomes further opportunities to discuss such matters.

Examination of Policy and Regulation Relating to Voice over Internet Protocol (VoIP) Services Report to the Minister for Communications, Information Technology and the Arts

R3: The longer-term strategy and work plan to deal with the broader transition to NGNs, including continuing VOIP issues, should be implemented by the Department in consultation with ACMA, the ACCC and relevant industry and consumer bodies. The work plan should include examination of the following:

(a)   jurisdiction and extraterritoriality issues (that is, the enforcement of Australian laws on service providers located offshore)
(b)   interoperability and standards
(c)   emerging competition issues
(d)   potential critical infrastructure vulnerabilities and other security issues
(e)   changes in consumer expectations, perceptions and behaviour that may make some legacy regulation redundant
(f)   new technologies such as next generation messaging that provide opportunities to extend the services available to people with disabilities
(g)   potential international and domestic Internet governance issues including numbering and addressing and voice spam that flow over into the NGN environment
(h)   quality of service.