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TO:  
[cyberstrategynsw@customerservice.nsw.gov.au](mailto:cyberstrategynsw@customerservice.nsw.gov.au)  
New South Wales Government (NSW)  
Australia

**2020 NSW Cyber Security Strategy**

First of all, a lot of thanks to New South Wales Government (NSW) for organising this important consultation.

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This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.  
PDF file of this opinion can be added to a relevant web page.

Annex 1 holds information about previous Australian consultations.  
Annex 2 holds information about copyright, licence and disclaimers.

Best Regards,

Jukka S. Rannila  
citizen of Finland  
signed electronically

[Continues on the next page]

41

**42 European Union context**

43

44 There are some European Union agencies which could be assessed.

45

**46 European Union Agency for Cybersecurity (ENISA)**

47 <https://www.enisa.europa.eu/>

48

**49 Body of European Regulators for Electronic Communications (BEREC)**

50 <https://berec.europa.eu/>

51

**52 European Union Agency for the Operational Management of Large-Scale IT**

53 <https://eulisa.europa.eu/>

54

55 These European Union agencies working with cybersecurity issues and their work could be  
56 assessed by the New South Wales Government (NSW).

57

**58 Another organisation to be assessed**

59

**60 European Centre of Excellence for Countering Hybrid Threats**

61 <https://www.hybridcoe.fi/>

62

63 European Centre of Excellence for Countering Hybrid Threats could be assessed by the New South  
64 Wales Government (NSW).

65

**66 One centre for informing different information technology problems**

67

68 I have advocated one centre for informing different information technology problems. At the  
69 moment there are several possibilities for informing different information technology problems.

70

71 Examples for informing information technology problems are following:

72

- 73 • Spamhouse Project <sup>1</sup> for tracking email spammers and spam-related activity
- 74 • SpamCop <sup>2</sup> service for reporting spam
- 75 • Common Vulnerabilities and Exposures (CVE) <sup>3</sup> for informing information-security  
76 vulnerabilities and exposures
- 77 • Forum of Incident Response and Security Teams <sup>4</sup>
- 78 • Computer emergency response team (CERT) <sup>5 6</sup> – also national CERT teams
- 79 • CSIRT Virus Watch <sup>7</sup>

1 <https://www.spamhaus.org>

2 <https://www.spamcop.net>

3 <http://cve.mitre.org>

4 <https://www.first.org>

5 [https://en.wikipedia.org/wiki/Computer\\_emergency\\_response\\_team](https://en.wikipedia.org/wiki/Computer_emergency_response_team)

6 <https://www.cert.org/>

7 <http://www.csirt.org>

- 80
- Scamdex<sup>8</sup>
  - 81 • providers of different technology solutions have their own reporting services
  - 82 • providers of different information technology **security solutions** have their own
  - 83 reporting services
- 84

85 **Opinion: At the moment there are too many independent organisations and**  
86 **services for informing different information technology problems.**

87

88 **Proposal: There could be some work for creating just one service for informing all**  
89 **information technology problems.**

90

91 **Proposal: Possibly there could be just one non-profit organisation which handles all**  
92 **information technology problems.**

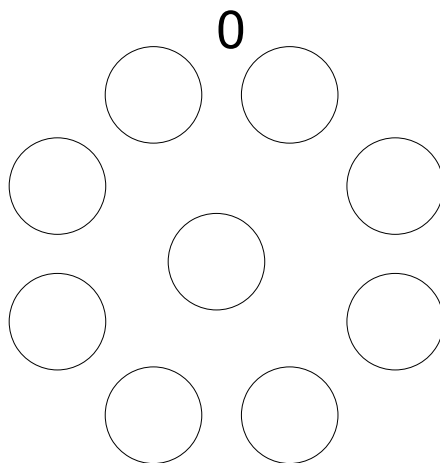
93

94 **Proposal: Different stakeholders could join one non-profit organisation which works**  
95 **with all information technology problems.**

96

97 **Different systems without connections**

98



99

100

101 Here I note that different stakeholders have their own information systems which may not be

102 connected to other information systems.

103

104 **Proposal: Different informations systems provided by different stakeholders could be**  
105 **assessed.**

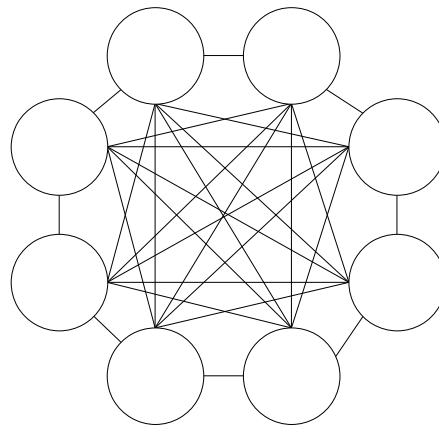
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107 **Different systems with complex connections**

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8 <http://www.scamdex.com>

1



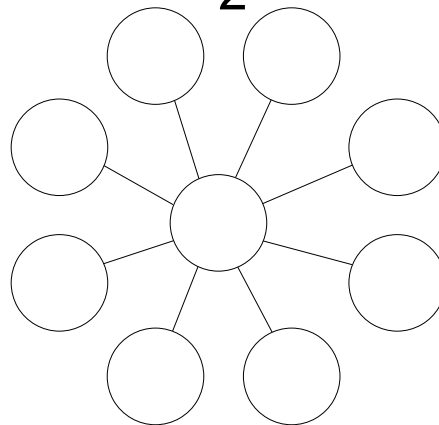
109  
 110 Generally speaking different information systems evolve and there can be several systems with  
 111 complex connections.

112  
 113 **Different systems with one central system**

114  
 115 Next option is top have one central system with connection to all other systems.

116

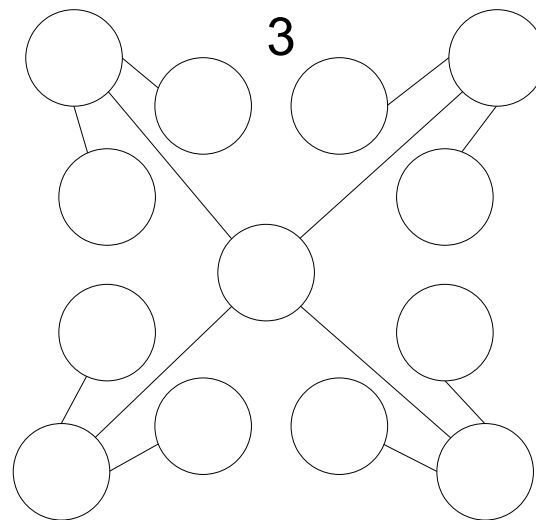
2



117  
 118  
 119 Problem with this option is dependency to just one central system which can have different  
 120 problems. This means that problem in one central system affects immediately other systems.

121  
 122 **Hierarchy between system**

123



124  
125

126 I have advocated several times hierarchy between system which means that there can be one central  
127 systems with different subsystems. This option means that a problem with one central systems does  
128 not affect all system at the same time.

129

130 **What this means for NSW?**

131

132 **Proposal: NSW could work with different stakeholders for creating just one non-profit**  
133 **organisation which could collect together all information about different information**  
134 **technology problems.**

135

136 **Proposal: NSW could work with different stakeholders for creating one central service**  
137 **for informing different about information technology problems.**

138

139 **Proposal: One central service can mean different hierarchies for different information**  
140 **systems.**

141

142 **About different standards**

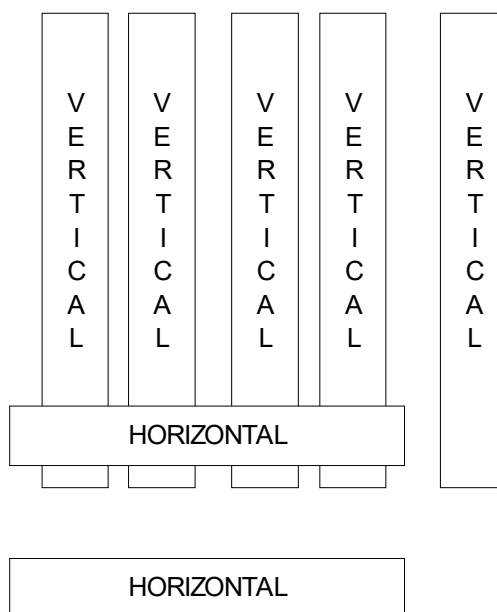
143

144 I have proposed several times to use open horizontal standards when developing different  
145 information system.

146

147 **Favouring open standards / Favouring horizontal standards**

148



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150

151 There are differences between horizontal and vertical standards. A simple example is naturally  
152 email solutions. There are several vertical standards when creating technically email solutions. Then  
153 there are horizontal standards which enable sending messages between technically different email  
154 solutions.

155

156 **Proposal: There could be assessment of vertical and horizontal standards.**

157

158 **Proposal: Using horizontal standards could be favoured when creating different**  
159 **information systems.**

160

161 Horizontal standards enables technological solutions which can work together. Horizontal standards  
162 hides different complexities in information systems.

163

164 **Opinion: The number of redundant standardisation efforts should be minimal.**

165

166 **Proposal: There could be separation of horizontal standards and vertical standards.**

167

168 **Proposal: There could be different standardisation efforts to horizontal standards and**  
169 **vertical standards.**

170

171 Personally I have advocated using different horizontal standards. For example email standards  
172 (horizontal) are implemented with very different technologies (vertical).

173

174 Here we can note some problems:

175

176

- 177 • some systems are based on **de-facto** standards
- 178 • some systems are based on **de-jure** standards
- 179 • there can be confrontations between **de-facto** and **de-jure** standards
- 180 • there can be a monopoly situation in some domain
- 181 • some standards may inhibit possible actions of some stakeholders
- 182 • there can be a standard war on some domains
- 183 • standards have different life-cycles
- 184 • systems have different life-cycles
- 185 • there can be mismatches between different life-cycles
- 186 • there can be failed standards
- 187 • there can be deprecated standards.

188

189 It is quite normal situation in the information technology field that there are competing standards  
190 for some application field. Therefore there are all the time ongoing “standards wars” or “format  
191 wars”. The information technology standards tend to be interrelated and one “standards war” or  
192 “format war” can lead to another similar situation.

193

194 I have advocated open standards even though in some cases open standards are not de facto  
195 standards. In practice public sector has very important role, when some standards are competing in  
196 the market place. Because public sector has a considerable power when buying/developing  
197 information systems and therefore public sector can sometimes direct markets to certain standards.  
198 Therefore there should be serious vigilance when assessing different standards and “standards” in  
199 some application fields.

200

201 There are different standards setting organisations on the information technology field. One list <sup>9</sup> of  
202 these standards setting organisations is provided by ConsortiumInfo.org.

203

204 One warning can be said about standards setting organisations. All standards setting organisations  
205 are not successes based on several factors and there can may irrelevant standards setting  
206 organisations. Market situation on different markets varies a lot based on different factors.

207

208 **Proposal: Current standardisation (e.g. list provided by ConsortiumInfo.org) efforts by**  
209 **different standard setting organisations could be assessed carefully.**

210

211 Personally I have advocated using different horizontal standards. For example email standards  
212 (horizontal) are implemented with very different technologies (vertical).

213

214 **Proposal: Governments should especially concentrate on horizontal standards.**

215

216 **Proposal: Some government agencies could apply for memberships of different**  
217 **standard setting organisations which develop especially horizontal standards.**

218

219 **Proposal: Government agencies should not be passive by-standers when different**  
220 **horizontal standards are developed.**

9 Standard Setting Organizations and Standards List, [www.consortiuminfo.org/links/linksall.php](http://www.consortiuminfo.org/links/linksall.php)

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**Proposal: Government agencies could financially support development of horizontal standards.**

**Proposal: There could some guidance for using open horizontal standards on different application fields.**

**What this means for NSW?**

**Proposal: NSW could work with different stakeholders for creating different open horizontal standards related to cybersecurity problems.**

**Note: There can be some global standards which could be assessed.**

**An example for cooperation: Web feeds (RSS and Atom)**



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I have advocated usage of web feeds<sup>10</sup> on several previous opinion documents. Actually there are two standards for web feeds: RSS<sup>11 12</sup> and Atom<sup>13 14 15</sup>.

**Proposal: Web feeds (RSS and/or Atom) could be advocated when developing different informations systems.**

**Proposal: Web feeds (RSS and/or Atom) should be used extensively for providing (real-time) information for different stakeholder(s) (communities).**

**Proposal: There can be different web feeds (RSS and/or Atom) for different stakeholder(s) – having just one web feed (RSS and/or Atom) may not be a feasible solution.**

**Proposal: Several web feeds (RSS and/or Atom) can be based on different viewpoints.**

It can be easier to create web feeds in different information systems since web feeds enable connections without direct system-to-system connections.

10 [https://en.wikipedia.org/wiki/Web\\_feed](https://en.wikipedia.org/wiki/Web_feed)

11 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

12 <https://en.wikipedia.org/wiki/RSS>, Wikipedia / RSS

13 [https://en.wikipedia.org/wiki/Atom\\_\(standard\)](https://en.wikipedia.org/wiki/Atom_(standard)), Wikipedia / Atom (standard)

14 <https://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

15 <https://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol



258 It can be noted, that different back-office systems (with a wide variety of different technologies) can  
259 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this  
260 kind solutions front-office systems dont need direct system-to-system communications with back-  
261 office systems.

262

263 **More technical consultations?**

264

265 Based on answers (this consultation generally) there could be more technically oriented  
266 consultations. Previously mentioned issues (this opinion) could be detailed for new technically  
267 oriented consultations.

268

269 **Proposal: More technically oriented consultations could be organised after this**  
270 **consultation.**

271

272

273

274 **Good luck !!!!!!!**

275

276 This opinion is quite limited and probably other opinions will result some constructive ideas.

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280 [Continues on the next page]

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## ANNEX 1

### **General web page for my opinions**

General web page for my opinions can be found from the following address:

<http://www.jukkarannila.fi/lausunnot.html>

### **Information about previous Australian consultations:**

EN: Opinion 54: Government Content Management System

[http://www.jukkarannila.fi/lausunnot.html#nro\\_54](http://www.jukkarannila.fi/lausunnot.html#nro_54)

EN: Opinion 56: National Identity Proofing Guidelines

[http://www.jukkarannila.fi/lausunnot.html#nro\\_56](http://www.jukkarannila.fi/lausunnot.html#nro_56)

EN: Opinion 57: Updating the Commonwealth Procurement Rules

[http://www.jukkarannila.fi/lausunnot.html#nro\\_57](http://www.jukkarannila.fi/lausunnot.html#nro_57)

EN: Opinion 72: Queensland biofuel mandate

[http://www.jukkarannila.fi/lausunnot.html#nro\\_72](http://www.jukkarannila.fi/lausunnot.html#nro_72)

EN: Opinion 73: Financial / Conceptual Frameworks

[http://www.jukkarannila.fi/lausunnot.html#nro\\_73](http://www.jukkarannila.fi/lausunnot.html#nro_73)

EN: Opinion 78: Consumer Complaints Register (NSW)

[http://www.jukkarannila.fi/lausunnot.html#nro\\_78](http://www.jukkarannila.fi/lausunnot.html#nro_78)

EN: Opinion 79: PCEHR (Information Commissioner Enforcement Powers) Guidelines 2015

[http://www.jukkarannila.fi/lausunnot.html#nro\\_79](http://www.jukkarannila.fi/lausunnot.html#nro_79)

EN: Opinion 85: Regulatory options for automated vehicles

[http://www.jukkarannila.fi/lausunnot.html#nro\\_85](http://www.jukkarannila.fi/lausunnot.html#nro_85)

EN: Opinion 87: Assessing privacy and big data on the Internet

[http://www.jukkarannila.fi/lausunnot.html#nro\\_87](http://www.jukkarannila.fi/lausunnot.html#nro_87)

EN: Opinion 90: Consent / Information and Privacy Commission NSW (IPC)

[http://www.jukkarannila.fi/lausunnot.html#nro\\_90](http://www.jukkarannila.fi/lausunnot.html#nro_90)

EN: Opinion 103: About lobbying - New South Wales

[http://www.jukkarannila.fi/lausunnot.html#nro\\_103](http://www.jukkarannila.fi/lausunnot.html#nro_103)

EN: Opinion 115: Framework for Secondary Use of My Health Record Data

[http://www.jukkarannila.fi/lausunnot.html#nro\\_115](http://www.jukkarannila.fi/lausunnot.html#nro_115)

330 EN: Opinion 117: The Digital Economy: Opening up the conversation  
331 [http://www.jukkarannila.fi/lausunnot.html#nro\\_117](http://www.jukkarannila.fi/lausunnot.html#nro_117)

332  
333 EN: Opinion 148: Updating Victoria's Open Data Policy  
334 [http://www.jukkarannila.fi/lausunnot.html#nro\\_148](http://www.jukkarannila.fi/lausunnot.html#nro_148)

335  
336 EN: Opinion 150: Consultation on a new Online Safety Act  
337 [http://www.jukkarannila.fi/lausunnot.html#nro\\_150](http://www.jukkarannila.fi/lausunnot.html#nro_150)

338  
339 EN: Opinion 153: Voluntary Code of Practice: A call for views  
340 [http://www.jukkarannila.fi/lausunnot.html#nro\\_153](http://www.jukkarannila.fi/lausunnot.html#nro_153)

341  
342 EN: Opinion 163: Government access to vehicle-generated data  
343 [http://www.jukkarannila.fi/lausunnot.html#nro\\_163](http://www.jukkarannila.fi/lausunnot.html#nro_163)

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346 [Continues on the next page]

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**ANNEX 2**

350 DISCLAIMERS

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