



TRANSPOWER

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TICSA team
Government Communications Security Bureau – Te Tira Tiaki
Wellington

By email: TICSA@ncsc.govt.nz

Submission: Feedback on TICSA Exemptions 2018

Thank you for the opportunity to provide feedback on your proposed changes to the exemptions issued under s49(1) of the Telecommunications (Interception Capability and Security) Act 2013 (TICSA). Transpower operates the national electricity grid and the security of our communications network is critical for the operation of the grid.

Exemption 1: Routine changes to networks

We support the proposed exemption for routine changes. We assume that the list of exempted activities (9 bullet points) is subject to the previous “routine changes” requirements but it would be helpful if this was clarified.

Exemption 2: Standard builds and bulk changes

We support the proposed exemption for standard builds and bulk changes.

Exemption 3: Emergency changes

We support widening the exemption to cover confidentiality and integrity issues.

We question whether it is necessary to only exempt emergency changes made on a temporary basis when a network operator must subsequently notify the change under s48 and if necessary implement any accepted mitigation proposal. It may not be necessary to implement a permanent solution if the emergency response adequately addresses the problem.

Removal of customer premises exemption (current exemption 6)

We support the removal of this exception.

Removal of testing/experimentation exemption

We support the removal of this exemption.

New exemption for network operators with reduced lawful intercept duties

We agree with the statement at paragraph 5.7 that niche operators may still provide critically important services. We encourage the Director-General to consider the application of this exception to niche operators that provide services to other network operators and particularly to network operators such as Transpower, which provide the types of services listed in s50(1)(b).

Extension of time period for exemptions

Transpower supports the proposal to extend the period for which the exemptions apply to three years, particularly seeing as the GCSB may vary or revoke the exemptions at any time if necessary.

Please contact me if you have any queries about this submission or require any further information from Transpower.

Yours sincerely

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

John Crisp
Telecommunications Manager