

February 11th, 2024

To Whom it May Concern:

RE: Submission on the Security of Critical Infrastructure (Telecommunications Security and Risk Management Program) Rules 2024

Titan Telecoms welcomes the opportunity to provide feedback on the Security of Critical Infrastructure (Telecommunications Security and Risk Management Program) Rules 2024 (TSRMP Rules). As an Australian-grown and privately funded telecommunications carrier specialising in dark fibre and optical connectivity solutions, we recognise the importance of securing Australia's critical infrastructure. However, we believe the current approach under the TSRMP Rules imposes unnecessary regulatory burdens on carriers like Titan Telecoms in a disproportionate way.

The TSRMP Rules automatically classify all carrier-owned assets as critical telecommunications infrastructure, irrespective of the actual impact on national security or operational risk. While large-scale national backbone infrastructure warrants stringent security obligations, some carriers operate networks that do not pose the same systemic risk. We suggest that the rules should apply in a more proportionate manner, taking into account the ownership of national backbone, intercapital, interconnect, or submarine cable infrastructure in addition to network scale or footprint. This approach would ensure that the regulatory burden is proportionate to actual security.

The TSRMP Rules impose extensive security obligations, including Critical Infrastructure Risk Management Program (CIRMP) compliance, mandatory cybersecurity maturity assessments, incident reporting and personnel security measures. While these measures are crucial for large-scale carriers, they create an undue compliance burden for smaller, specialised providers. The cost and administrative complexity associated with adhering to cybersecurity frameworks will disproportionately impact regional carriers. Additionally, the time allowed for compliance in the draft rules is far too short for meaningful compliance for many carriers coming from a zero-base. We suggest that the provide transition periods for compliance are considerably longer, to allow carriers to implement necessary controls without significant operational disruptions.

The telecommunications sector is already subject to security obligations under the Telecommunications Sector Security Reforms (TSSR). The TSRMP Rules create regulatory duplication without clear mechanisms for integration, forcing carriers to comply with overlapping obligations. We suggest that the TSSR and TSRMP accomplish similar things in different ways, the schemes have substantial overlap, and it would be more effective to establish a single, consolidated reporting framework that eliminates redundant security obligations.

The TSRMP Rules place extensive responsibilities on carriers to manage the security of their entire supply chain. As a provider of dark fibre and optical connectivity solutions, Titan Telecoms relies on vendor partnerships for certain network components. The expectation that carriers must ensure full compliance of international suppliers imposes challenges that are beyond the reasonable control of operators. We suggest that the rules more clearly define vendor responsibilities for compliance, ensuring that obligations do not fall solely on

carriers. Further, we suggest that the rules include only realistic security expectations for carriers that have little control over the manufacture or development of the hardware.

Titan Telecoms fully supports the objective of enhancing the security of Australia's critical telecommunications infrastructure. However, the TSRMP Rules must be revised to introduce a more proportionate, and practical approach to regulation. By refining the classification of critical telecommunications assets, aligning obligations with existing security frameworks, and ensuring a scalable compliance model, the rules can better achieve their intended security outcomes without placing excessive burdens on smaller carriers.

Sincerely,

Nic Tippelt
Titan Telecoms