Taking Urgent Requests Seriously

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The Sequence

- PSWG via the GAC requested Phase I include <u>Urgent Requests</u>
- Initial Phase I spec left a detail unspecified
- Implementation Review Team (IRT) attempted to fill in the detail
- Closer examination revealed deeper problems
- Board eliminated the requirement
- SSAC wrote SAC 122

Urgent Requests

"Urgent Requests for Lawful Disclosure" are limited to circumstances that pose an imminent threat

> to life,
>
> of serious bodily injury,
>
> to critical infrastructure, or
>
> of child exploitation

in cases where disclosure of the data is necessary in combatting or addressing this threat.

Critical infrastructure means the physical and cyber systems that are vital in that their incapacity or destruction would have a debilitating impact on economic security or public safety.

Component elements

Expected   **Actual**

- Justification of requirement

- Well defined submission process
    - Minutes

- Control over submission

- Required response time
    - Minutes to hours

Component elements

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- Well defined submission process
  - Minutes
- Control over submission
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Actual
- No documentation
- No separate submission process
  - No SLA on submission time
- Anyone can submit
- Best efforts
  - Compliance: threshold X days

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Not fit for purpose

Revisiting

Expected

- Justification of requirement
- Well defined submission process
  - Minutes
- Control over submission
- Required response time
  - Minutes to hours

To Do

- Document need
- Design/implemnent submission process
  - Contacts; submission process
- Accountability for submitters
- Design/implement automated response process