.my ccTLD’s approach to Contingency Planning: BCP experience from Information Security perspective

APTLD members meeting

23rd & 24th Feb 2012
What is a Contingency Plan?

Plan devised for an exceptional risk that, though unlikely, would have catastrophic consequences. Contingency plans are often devised by governments or businesses. For example, suppose many employees of a company are traveling together on an aircraft which crashes, killing all aboard. The company could be severely strained or even ruined by such a loss. Accordingly, many companies have procedures to follow in the event of such a disaster. The plan may also include standing policies to mitigate a disaster's potential impact, such as requiring employees to travel separately or limiting the number of employees on any one aircraft.

[http://en.wikipedia.org/wiki/Contingency_plan as viewed on 15 February 2012]
If you are attacked by a Tiger ......
.my’s Business Continuity Plan

- Purpose of the BCP
- Scope of the BCP
- Benefits of BCP
- BCP Implementation @ .my
- Activities
- Summary
- Q & A
1. Purpose of the BCP

**ISMS Requirements**
- To comply to ISO 27001 ISMS requirements

**National Cyber Security Policy**
- Implement framework that specifies cyber security requirement controls
- Critical National Information Infrastructure (CNII)

**Regulatory requirements**
- To comply with government directives that CNII to be certified with ISMS within 3 years (2010 – 2013).
- Personal Data Protection Act (PDPA) 2010.
- Compulsory to be ISMS certified by MCMC prior to 2013 and working closely with MCMC.

**10th Malaysia Plan initiative**
- Funded by MOSTI to implement ISMS
## 2. Scope of the BCP

<table>
<thead>
<tr>
<th>Category</th>
<th>Objectives</th>
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<tr>
<td><strong>Personnel</strong></td>
<td>• Ensuring the safety of .my personnel.</td>
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<td></td>
<td>• Prevention against epidemic or pandemic.</td>
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<td><strong>Documentation</strong></td>
<td>• Safeguard operational and financial documents.</td>
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<td></td>
<td>• Protecting customers confidential information.</td>
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<tr>
<td><strong>Registry System</strong></td>
<td>• Protecting Registry System from outage.</td>
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<td>• Ensuring availability of the domain name services to the public.</td>
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<td><strong>IT Infrastructure</strong></td>
<td>• Ensuring continuous operation in the event of disaster.</td>
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<tr>
<td></td>
<td>• Safeguard critical system.</td>
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<td><strong>Operation</strong></td>
<td>• Implementing the capability to continue operation in a short period of time due to disaster.</td>
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<td>• Ensure readiness in the event of disaster.</td>
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3. Benefits of BCP

Personnel
- Business continuity planning proves to .my personnel that .my have their employment and personal well-being in mind.
- Boost morale and productivity.

Operation
- Offers management the chance to gain a better understanding of the minutia of the business and ultimately helps .my identify ways to overcome any short comings.
- It can prepare the organization to face not only large-scale problems. Also helps make smaller problems that might have caused continuity interruptions to become moot, through detailed planning.

Reputation
- Informing our customers that we have taken steps to ensure continuity of .my domain name services ensuring our commitments to them.
- Placing high priority on quality service instills the customer’s confidence in our business.
- A Business Continuity plan helps protect the organization's image, brand, and reputation.
4. BCP Implementation @ .my

x-Maya Drill
- Started in 2008.
- Organized by National Security Council to protect CNII.
- Have been activated to repel attack by Hacker Anonymous “Operation Malaysia’ in 2011 by .my.

Alternate DR site
- DR site for servers and network connectivity.
- Alternate command centre for Disaster Recovery Team using conference rooms at designated hotel.

BCP Testing
- Conducted BCP testing by simulating registry system outage on 6th Jan 2012.
- Migrating services from production to DR site.

Offsite Storage
- Offsite storage for important documents.
- Offsite storage for backup tapes.
5. Activities

Fire & Safety Training

Fire safety consultants

BCP Coordination Meeting
- Business Impact Assessments, DR Plan
- Communication with Third Parties providing support services to .my including our 59 Resellers
6. Summary

Success Factor

- Understand the main purpose of the BCP.
- Use a project management approach.
- Analyze the nature of the business.
- Manage the level of detail.
- Actively work on communications.
- Structure the business continuity plan around action plans.
- Test plan with drills and exercises

Continual Improvements

- Analyze the business to identify possible impacts that threaten the survivability of the business.
- Develop appropriate actions to minimize the impact of disruptions.
- Test the actions to determine effectiveness and improve the planned responses.
- Provide for the implementation and ongoing management and updating of the plan.
Implementation Timelines

2011
ISMS documentations (policies, processes & guidelines)

2012
ISMS Certification under ISO/IEC 27001:2005

2013
Adopting ERM best practices under ISO/IEC 31000:2009
Tiger Attack Video Case Study

An exceptional risk with a legal ending...

Copyright registration for tiger attack video completed

January 28, 2008: Wilderness Films India Ltd. has completed the process of filing the registration of copyright, for the famous Tiger attack video, one of the most shocking clips to be seen on television, and one of the top ten videos of all time on the internet.

The Certificate of Registration was officially recorded on the 28th of January, 2008. The registration number accorded is PA 1-591-809 and it is signed by Marybeth Peters on behalf of the Register of Copyrights, United States of America.

The copyright registration of this work was necessitated by the widespread copyright infringement by sites such as Google Video and Youtube, which have allowed users to upload Wilderness Films copyright work to their sites. Each time WFIL has filed copyright objections with these sites, the clips in question have been pulled off, only to reappear within minutes. Over 250 million page views of this particular clip, and other WFIL clips, have appeared illegally over Youtube and Google Video.

It was this situation which forced WFIL to pull out of the Google Video contract, and stop streaming our videos on their site. Google Video and Youtube seemed to display a brazen indifference to international and US copyright laws, hiding behind the protection of the US DMCA act.

WFIL has decided to initiate legal action against Google and Youtube for their copyright infringement and the related contractual claims in regard to breakage of the revenue share contract that Google Video entered into with WFIL.
Q & A
Thank You

.my DOMAIN REGISTRY
http://www.domainregistry.my

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Senior Executive, Legal & Corporate Governance