



Australian Government
Department of Communications

FOI REQUEST NO. 05-1415

Mr Ben Fairless
righttoknow.org.au

ACCESS DECISION
STATEMENT OF REASONS

I, Elizabeth Lawler, Manager FOI Unit, Legal Division of the Department of Communications (**Department**) being:

- (a) authorised by the Secretary under subsection 23(1) of the *Freedom of Information Act 1982* (**FOI Act**) to make decisions about access to documents under the FOI Act, and
- (b) required under section 26 of the FOI Act to provide a Statement of Reasons for my decision,

make the following statement setting out my findings on material questions of fact, referring to the evidence or other material upon which those findings were based, and giving the reasons for my decision.

A. DECISION

- 1. There is one document covered by this request.
- 2. I hereby decide that this document is to be exempt in full under section 33(a)(i) of the FOI Act.

B. BACKGROUND

- 3. On 16 July 2014, Mr Ben Fairless lodged an application via righttoknow.org.au requesting access (the **FOI Request**) to:

Information pertaining to your Information Technology infrastructure.

Namely, I am after records detailing the IPv4 (and if relevant, IPv6) addresses used to access the public internet from within your network.

To clarify, these are the public facing addresses of your private network. I am only requesting addresses that are used to access the general public internet.

In addition, if it is such that a particular IP address serves a particular area within your department (for example, one IP address is used for Media Relations,

while another is used for Ministerial Communications), I also request access to this information.

4. I have consulted with the relevant officers within the Department and have been advised that the information you seek under your request is not available in discrete written form, but rather forms part of the Department's Information Technology network configuration documentation.
5. Section 17(1)(c)(i) of the Act provides that where an agency can produce a written document containing the information sought by the use of a computer or other equipment that is ordinarily available to the agency for retrieving or collating stored information, the agency should deal with the request as if it were a request for access to written document.
6. Pursuant to subparagraph 17(1)(c)(i) of the FOI Act, the Department has produced a one page written document containing the information you have sought.

C. MATERIAL ON WHICH MY FINDINGS OF FACT ARE BASED

7. I based my findings of fact and decision on the following material:
 - the terms of the FOI Request;
 - the content of the document falling within the scope of the FOI Request;
 - relevant provisions of the FOI Act;
 - Guidelines issued by the Australian Information Commissioner under section 93A of the FOI Act and published by the Office of the Australian Information Commissioner (**OAIC Guidelines**);
 - advice from departmental officers with responsibility for matters relating to the documents to which the Applicant sought access;
 - advice from other Commonwealth agencies; and
 - the Department's *Guidelines for Processing Freedom of Information Requests* (**Department's Guidelines**).

D. REASONS FOR DECISION

8. My reasons for deciding that the relevant exemption provision of the FOI Act applies to that document or part of the document are set out below.

Section 33 – Exemption – Documents affecting National Security, Defence or International Relations

9. Section 33(a)(i) of the FOI Act provides:

A document is an exempt document if disclosure of the document under this Act:

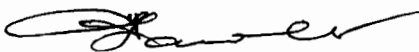
(a) would, or could reasonably be expected to, cause damage to:

(i) the security of the Commonwealth

10. The requested document contains information about the Department's infrastructure design. It is not considered good security practice for agencies to explicitly publish or otherwise make public these details as this information could be used to facilitate malicious attacks on the Department's or other government agency's networks. For example, it could enable more direct targeting of denial of service attacks.
11. As discussed in para 5.33 of the OAIC Guidelines, when considering application of the exemption under section 33 of the FOI Act, it is reasonable for decision makers to take into account the 'mosaic theory', a theory which holds that individual pieces of information when combined with other pieces can generate a composite – a mosaic – that can damage Australia's national security, defence or international relations.
12. I am of the view that the information sought in this FOI request, when aggregated across the whole of government, could appreciably raise the risk profile of government agencies and that release of this information may lead to increased effectiveness of malicious activity targeting government networks. This constitutes a potential threat to the security of Commonwealth networks and communication systems, and to the proper and efficient conduct of each agencies operations.
13. I am satisfied that the disclosure of information contained in the document, would or could be reasonably be expected to cause damage to the security of the Commonwealth. Therefore, I find that these documents contain exempt materials under subsection 33(a)(i) of the FOI Act.

E. REVIEW RIGHTS

14. This decision is subject to review under sections 54 and 54L of the FOI Act. The OAIC's FOI fact sheet 12 (*Freedom on information – Your review rights*) is attached to my reply letter to the Applicant for his information.



Elizabeth Lawler
Manager, FOI Unit
Legal Division

19 August 2014