ITI Comments on the Restricted Movement Order

March 20, 2020

We at the Information Technology Industry Council (ITI) appreciate the opportunity to provide feedback to MITI on COVID-19 efforts and the Restricted Movement Order (RMO).

About ITI

ITI is a global trade association that represents over 70 the world's leading information and communications technology (ICT) companies. ITI's membership comprises the leading global innovators from all corners of the technology sector, including hardware, software, digital services, semiconductors, network equipment, and platforms, as well as "technology-enabled" companies that rely on ICT to evolve their businesses. ITI engages policymakers around the world to promote innovation, security and sustained economic opportunity.
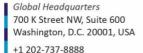
Recommendation:
Define ICT and Manufacturing as Essential Business

In the face of a rapidly evolving crisis, ITI and its members understand Malaysia's need for quick and decisive policymaking and we appreciate the steps the government is taking to ensure its citizens and our companies' employees remain healthy. We are concerned, however, that the breadth of the RMO will unintentionally limit the flow of essential goods and services and impede the movement of workers from returning to their jobs and homes. We respectfully request that the Malaysian government broaden the scope of "essential business" to include companies that critically manufacture and provide ICT components, products and services.

We would encourage the Malaysian government to refer to the U.S. Department of Homeland Security's Cybersecurity & Infrastructure Security Agency (CISA) guidance. In CISA's "Memorandum on Identification of Essential Critical Infrastructure workers during COVID019 Response," it includes communications and information technology sectors, along with critical manufacturing, as part of essential critical infrastructure. The Memo also rightly states that contemporary just-in-time supply chains require workers "to access certain sites, facilities, and assets to ensure continuity of functions."[1] We urge Malaysia to take a similar approach to defining critical infrastructure.

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[1] https://www.cisa.gov/sites/default/files/publications/CISA-Guidance-on-Essential-Critical-Infrastructure-Workers-1-20-508c.pdf

We would also request additional clarification on movement of workers under the Order. We would be pleased to engage in a dialogue with the Government of Malaysia to help address these issues.

How the Tech Sector Combats COVID-19

Technology plays a crucial role in facilitating a comprehensive response to the crisis, from manufacturing critical healthcare-related devices and components to providing products and services to support telework, distance learning, and tele-health arrangements. Monitors, sensors, and ventilators are just some of the critical tech components and devices that will be needed for advanced medical care.

ICT companies work around the clock to support and secure the networks and information of other critical sectors. Computers, mobile devices, office equipment, key networking equipment, data centers, and cloud services will also be crucial in a period where many employees and schools will turn to remote, tech-based solutions to support continued productivity and education. Maintenance of critical infrastructure will be supported in this crucial time by technicians at factories and data centers that provide much-needed services and spare/repair parts. It is vital that manufacturers and supply chain vendors that provide the undergirding hardware and software for other critical sectors keep running.

Cybersecurity equipment and services are needed to protect these critical infrastructure sectors that are so important in responding to the COVID19 epidemic. We regularly see cyberattacks against critical infrastructure providers, including health care providers. For example, in October 2019, Australia saw a ransomware attack that forced hospitals to shut down their IT systems.[2] With the COVID-19 developments, a cyberattack against an already burdened health care sector could prove catastrophic.

As nations and multinational operations continue to be affected by the spread of COVID-19, our companies have taken significant measures to reduce risk to their employees and contribute to relief efforts around the world. In many manufacturing facilities, production has continued with new arrangements to reschedule and limit the density of workers, along with increased sanitation and health precautions. Our companies have also contributed medical supplies and donations to heavily affected areas and are striving to eliminate disinformation and instead promote well-researched, best practices and advice to workers and consumers. Cybersecurity companies are rapidly deploying technologies to secure remote workers.

While taking steps to protect the health and safety of their workers, tech companies as well as their manufacturers and supply chain vendors must continue to be able to develop and deploy key technologies that will be essential during the crisis. Malaysia's relief efforts

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[2] https://www.abc.net.au/news/2019-10-01/victorian-health-services-targeted-by-ransomware-attack/11562988

will be all the more effective when these companies can effectively operate as "essential businesses" under the RMO.

Prohibiting operations of tech companies will stymie relief efforts in the short term and holds significant consequences for Malaysia's investment and business environment in the long-term. At a time when Malaysia is among the leaders in the region with high numbers of foreign investment and manufacturing, stark restrictions on technology companies and workers' operations could have long-lasting damage on the Malaysian economy.

Conclusion

We appreciate all that you and your colleagues in the Malaysian government are doing to to respond to this crisis, strengthen safety precautions, and coordinate relief efforts. We hope that the current policy can be amended while supporting your efforts by reflecting the needs of workers and the general public in this important area. We would welcome the opportunity to engage in a dialogue with you in order to address this concern in the most constructive way possible.

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