

Data Standards Body

Technical Working Group

Noting Paper 335 – Non-functional Requirement Working Group Trial

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Context

The Non-functional Requirements (NFRs) included in the Consumer Data Standards have been a part of the standards since July 2019 and were made binding in October 2021.

The NFRs set a baseline expectation for performance and availability of technical implementations that support the Consumer Data Right ecosystem. The importance of these NFRs increases as CDR usage increases and data sharing under the CDR becomes more integral for business activity in Australia.

Changes to the NFRs were proposed in late 2022 in response to expanding scale of the ecosystem. These changes were initially consulted on via the standards maintenance process and were later consulted on directly via [Decision Proposal 288 - Non-Functional Requirements Revision](#).

Consultation on Decision Proposal 288 included feedback that a separate, more targeted, process is needed to help participants to plan their infrastructure and to be proactive in setting the NFRs rather than reactive to issues as they occur.

In response to this feedback, three workshops were conducted by the DSB in August and September. During these workshops, attendees proposed that a working group, with a small number of consistent members, that could assess operational data and proposes changes to the NFRs would be an effective mechanism for managing NFRs for the CDR.

This paper summarises the feedback received during these workshops and proposes an initial trial of a NFR Working Group established as an advisory group to the Data Standards Chair.

Workshop Feedback

During the two physical, and one virtual, workshops held in August and September of 2023 the following feedback was received.

Sharing of performance data

- There was consistent feedback provided that NFRs should be set based on data provided by participants on existing performance.

- The sharing of data in a fully open and transparent consultation is a barrier for many participants for a variety of reasons.
- The type of data that would need to be shared would likely evolve over time and, in some cases, may be tailored to a specific issue being addressed.
- The internal legal teams of some DHs were explicitly concerned about sharing detailed performance data with the regulator due to the risk that the data could lead to compliance action being taken.
- Counter feedback was also provided that the involvement of the regulator would be of benefit since performance issues are frequently raised as incidents between participants.

Future planning and forecasting

- DHs indicated that a multi-year forecast for NFRs would be beneficial due to the long lead time of infrastructure investment planning in most organisations.
- It was acknowledged that the ability to forecast traffic and usage is very difficult and unlikely to be accurate but that this would still be useful for participants.
- It was also acknowledged that a forecast of future usage can only be done by the participants. The DSB would not be able to do this kind of planning without active involvement of both ADRs and DHs.

The process of consultation

- Participants appreciate the transparency and openness of the current consultation process and would like to ensure that this is not lost if the process is changed.
- There was feedback during the workshops, and in response to Decision Proposal 288, that a working group of participants to collaborate on proposals to change the NFRs that are then publicly consulted on would be a possible solution.
- Participants indicated that a working group would need members that have technical expertise in performance and infrastructure management and that it would be best if there was continuity of membership over time.

Proposal: NFR Working Group Trial

To address the feedback received during Decision Proposal 288 and during the NFR workshops a trial of a working group is proposed.

The intent of this trial is to test the approach proposed by the community for more targeted consultation and planning on NFRs. If this trial demonstrates that the approach is effective, the DSB will propose that a more permanent version of the group be established.

Proposed Working Group

Terms Of Reference

The NFR working group would be established by the Data Standards Chair as a group to provide advice to the Chair on the development of standards.

The scope of the initial working group is proposed to be as follows:

- To develop a forecast for the expected future usage of the CDR ecosystem, under various hypothetical scenarios, that can be used to help CDR participants plan their future infrastructure requirements.
- To procure, securely collate, and review actual performance data from CDR participants that can be used to identify changes that need to be made to the CDR NFRs.
- To propose changes to the CDR NFRs that can then be commented on by all CDR participants in a public consultation.
- To provide feedback on the effectiveness of the trial and help shape a more permanent approach for the management of NFRs.

Membership

The membership of the initial NFR working group will be determined as follows:

- Nominations will be open to anyone to become a working group member.
- The preferred criteria for membership are:
 - Representative of an existing, operationally active, participant in the CDR ecosystem,
 - Technical expertise in the delivery and management of digital infrastructure,
 - Ability to work collaboratively in a group,
 - Capacity for attendance at a regular monthly meeting, and
 - Capacity to read and analyse information and minutes in between meetings.
- The target size for the working group will be nine members.
- Members will be required to accept a code of conduct that will include requirements for managing confidential performance data provided to the working group to help decision making.
- In addition to the members of the working group the ACCC, Treasury and OAIC will be invited to nominate an observer.
- The Data Standards Chair will have sole discretion on the number of members for the NFR Working and the individuals that shall be invited as members or observers.

Operations

It is proposed that the working group will operate as outline below:

- The DSB will act as Chair and Secretary for the meeting.
- The working group will meet once per month for around two hours.
- An agenda, describing issues to be discussed will be published ahead of the scheduled meeting time.
- Available data, if any, that can be used as an aid to discussion will be made available to members ahead of the scheduled meeting time.
- Minutes will be taken for each meeting documented outcomes but will not contain attribution of anything said in the meeting or the detail of discussion.
- The agenda and minutes for each meeting will be considered public and will be published by the DSB.
- The initial backlog of issues to address will be created by the DSB based on feedback received to date.
- Once operational, the working group will actively curate the backlog of issues to address.

Trial Conditions

To ensure a long enough period to validate the operation of the working group the initial trial will run for six meetings. This time may be truncated if a majority of the members of the working inform the Chair that the working group is not effective, and the trial should be ended early.