

Will you place your documents in the cloud?

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Cloud computing is getting a lot of buzz because it offers a way for you to lower costs and access resources with mobile devices that people are starting to carry as frequently as they used to carry briefcases. Like most innovations, there are concerns arising out of cloud computing and how lawmakers and regulators are responding to it.

Forrester Research defines cloud computing as “a pool of abstracted, highly scalable, and managed computing infrastructure capable of hosting end customer applications and billed by consumption.” If you have used Google Apps (or Applications), or Amazon.com, you have used cloud computing. As of September, 2008, ComScore Media Metric counted 4.4 million users for Google Docs (or Documents).

Among the critics of cloud computing, you will find the Electronic Privacy Information Center (EPIC) (<http://www.epic.org>). In March, 2009, EPIC filed a petition with the Federal Trade Commission (FTC) to investigate the privacy and security of Google Apps, Gmail, and Picasa parts of the Google cloud application suite. EPIC also filed an FTC petition against Microsoft's Passport application. Another EPIC filing concerned Choicepoint business practices after a 2005 security breach. The Choicepoint filing resulted in fines totaling \$15 million.

What to Consider

If you are considering using cloud computing suites, ask yourself these questions:

What will you put in the cloud? You can place your data files, letters, other materials or program applications like word processors or spreadsheets in the cloud. This is not a revolutionary idea--when I first learned online research, I was using a Texas Instruments Silent 700 terminal and a dial-up connection. The terminal had no memory and the only record one had of the interaction was a long strip of thermal paper. The brains driving the interaction were mine (with the

information generated from a documentation search that built the search strategy) and the Lockheed computers I was accessing on which the Dialog Information Retrieval System was running. You do the same thing now when you search Google.

Do you have permission to put the data or application in the cloud? Do you have appropriate licenses?

Must you comply with a relevant statute?

Do the data you have raise issues that would include such requirements as those specified by contract, by privacy considerations, or electronic discovery?

How much service will your use of data in the cloud require? Such considerations as expenses of licensing for application software, encryption, storage, training, and backup are worthy of addition to the budget.

What level of security will you require? Some professionals must keep the confidences and secrets of their clients secure. That infers the use of encryption software and the use of reasonably secure ways to pass encryption keys (the character strings used to unlock documents that are encrypted) to people entitled to see the documents you have encrypted. It also infers your use of procedures to strip the metadata out of documents you store in the cloud.

Are you billed in a way that allows for easy accounting? Can you separate amounts for the purpose of charge back or auditing?

What liability is there for the loss of data? Who is responsible for maintaining the integrity of data in the cloud?

If either party wants to end the agreement, who does what? How do we know the agreement is over and what happens then?

What is the long-term stability of the service provider? Is it planning to be around to serve you in the future?

For more information about security issues, take a look at Security Guidance for Critical Areas of Focus in Cloud Computing online at <http://www.cloudsecurityalliance.org/csaguide.pdf>.