

# City of Palo Alto

*Office of the Mayor and City Council*

June 15, 2023

The Honorable Jacqui Irwin  
California State Assembly  
1021 O Street, Suite 6220  
Sacramento, CA 95814

**RE: AB 1637 (Irwin) Local Government: Internet Websites and Email Addresses –  
City of Palo Alto – Notice of Opposition (As Amended 5/18/23)**

Dear Assembly Member Irwin,

On behalf of the City of Palo Alto, I write in opposition to your AB 1637, which requires cities and counties to secure and utilize their website through a new .gov or ca.gov domain no later than January 1, 2027. This includes a requirement to shift all employee email addresses to the updated domain within the same time frame.

While we appreciate the intended goal of this measure and the perceived cybersecurity benefits that some believe utilizing a new domain may provide, we remain deeply concerned about the added costs associated with migrating to a new domain and corresponding email addresses; confusion that will be created by forcing a new website to be utilized; and the absence of any resources to better assist local governments with this proposed migration.

Despite the fact that obtaining a .gov domain is free of cost, the costs of shifting everything associated with our City's website address will present a long and expensive process, for which this bill provides no funding support to initiate. Our City's IT department will need to re-code, establish corresponding e-mail addresses, address network login changes, provide for single sign-on/multi-factor authentication, encryption keys, revise and redesign website/url links, update social media and external entities, and will need to re-print all materials (business cards, community information flyers, etc.) that include outdated web address domains. In our opinion, part of our cybersecurity strategy is for our employees to know threats when they see them. Changing the domain name requires an extensive employee and community outreach campaign to ensure that staff do not fall victim to a cyber attack during our transition process.

What's more, applying for a .gov domain is processed on a first-come first-serve basis. It is unclear whether the Cybersecurity and Infrastructure Security Agency (CISA) – the agency responsible for approving these domains – will even have the capacity to process all local agencies' changes within the state of California within the required timeframe. And additionally, that a domain name similar to the existing domain name would even be available to our community.

Further, while we understand and appreciate your concerns with recent local cybersecurity attacks, we must also recognize that many of these were done to cities with an existing .gov domain. These include BART.gov, OaklandCA.gov, USMarshals.gov, FBI.gov, and even closer to home, the California Department of Finance's website. These were recently hacked and/or victims of serious ransomware attacks crippling their websites, historical data, and how constituents accessed information on those websites.

City officials provide critical information to our constituents on a daily basis. Changing the domain by which they must access information and communicate with officials presents challenges, mistrust, and confusion. Additionally, as evidenced by the COVID-19 pandemic, local IT departments provide critical information necessary to constituents' safety during times of emergency. Diverting their attention to implementing an unnecessary domain change not initiated by the local agency as part of a larger communications strategy could hinder our ability to provide timely information to residents in need.

For these reasons, the City of Palo Alto must respectfully oppose your AB 1637. This measure imposes costly duties on an expedited timeframe without reasonable justification or compliance resources.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lydia Kou", with a small horizontal line underneath the name.

Lydia Kou  
Mayor  
City of Palo Alto