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Radio Regulatory Technical Advisory Group (RR-TAG)

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| Proposed Reply Comment to FCC NPRM: Cybersecurity Labeling for Internet of Things |
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This document drafts a proposed reply comment to FCC NPRM: Cybersecurity Labeling for Internet of Things.

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Electronic filing [September 24, 2023]

Re: Reply comment to NPRM: Cybersecurity Labeling for Internet of Things

Dear [Federal Communications Commission],

IEEE 802 LAN/MAN Standards Committee (“IEEE 802 LMSC”) thanks Federal Communications Commission for issuing the consultation on Notice of Proposed Rulemaking (“NPRM”): Cybersecurity Labeling for Internet of Things and for the opportunity to provide reply comments.

IEEE 802 LMSC is a leading consensus-based industry standards body, producing standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless specialty networks (“WSNs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANs”). We also produce standards for wired Ethernet networks, and technologies produced by implementers of our standards are critical for all networked applications today.

IEEE 802 LMSC is a committee of the IEEE Standards Association and Technical Activities, two of the Major Organizational Units of the Institute of Electrical and Electronics Engineers (IEEE). IEEE has about 400,000 members in over 160 countries. IEEE’s core purpose is to foster technological innovation and excellence for the benefit of humanity. In submitting this document, IEEE 802 LMSC acknowledges and respects that other components of IEEE Organizational Units may have perspectives that differ from, or compete with, those of IEEE 802 LMSC. Therefore, this submission should not be construed as representing the views of IEEE as a whole[[1]](#footnote-1).

[Need to get feedback from 802 IoT and security experts. Add 1-2 paragraphs on IEEE 802 related standards on IoT (802.11ah) and security (802.1X/WEP/802.11i?)].

IEEE 802 LMSC applauds the Commotion NPRM proceedings on cybersecurity labeling program for Internet of Things (IoT). IEEE LMSC recognizes the Commission goal of improving consumer confidence and understanding of the security of their connected devices and supports proposed voluntary cybersecurity labeling program for such devices.

Please find below the IEEE 802 LMSC’s reply comments on the NPRM focusing on Cybersecurity Labeling for unlicensed wireless Internet of Thing (“IoT”) devices.

**Industry-led Cybersecurity Standards**

IEEE 802 LMSC supports the Commission’s recognition of industry-led development and implementation of cybersecurity standards such as [IEEE 802.1X, 802.11i,] Wi-Fi CERTIFIED WPA3 program led by Wi-Fi Alliance [reference to WFA comment on NPRM].

IEEE LMSC agrees with Wi-Fi Alliance that there is no need to convene a Commission-sponsored group to develop standards to avoid replicating the work already completed or those underway by industry-led standard bodies. IEEE LMSC also supports proposal by Wi-Fi Alliance where the Commission evaluates cybersecurity standards developed by approved or accredited industry organization for adoption under the IoT Cybersecurity Labeling Program.

**Scope of Cybersecurity Labeling**

IEEE 802 LMSC believes that the scope of proposed cybersecurity labeling program should be carefully studies and limited to IoT consumer products. More specifically, IEEE 802 LMSC proposes to adopt NIST Recommended Criteria for Cybersecurity Labeling for Consumer Internet of Things (IoT) Products[[2]](#footnote-2) and exclude common general purpose computing equipment (e.g., personal computers, smartphones) as well as general internet and networking infrastructure (e.g., internet routers and switches).

In addition, to meet the goal of improving consumer confidence and understanding of the security of connected devices IEEE 802 LMSC to consider focusing on labeling IoT end products and exclude other components such as modules, gateways, backends, or applications.

**Cybersecurity Testing and Conformity**

IEEE 802 LMSC supports the consideration in the NPRM as commented by various responses [References to Wi-Fi alliance and Keysight responses] to provide options for device manufacturers testing and self-assessment as well as FCC-approved industry accredited labs (e.g. Wi-Fi CERTIFIED labs) or by an FCC-approved CyberLABs. IEEE 8092 LMSC believes that availably of these options for conformity is key in efficiency of the compliance programs and hence critical in successful adoption of such voluntary program. Details of such options and specific scope of sub-testing is a subject of further study.

**Conclusion**

IEEE 802 LMSC thanks the Commotion for the opportunity to comment on the important NPRM proceedings on cybersecurity labeling program for Internet of Things (IoT and supports) and supports initiating the voluntary labeling program. We respectfully request the Commission to take into account our reply comments listed in this response.

Respectfully submitted

By: /ss/.

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1. This document solely represents the views of IEEE 802 LMSC and does not necessarily represent a position of either the IEEE or the IEEE Standards Association. [↑](#footnote-ref-1)
2. Recommended Criteria for Cybersecurity Labeling for Consumer Internet of Things (IoT) Products, Section 2.1 Scope of an IoT Product, February 4 2022, <https://doi.org/10.6028/NIST.CSWP.02042022-2>. [↑](#footnote-ref-2)