Comments on Privacy Recommendation PAR and CSD

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Re: Proposed Privacy Recommendation PAR

Venue:
   IEEE 802 Plenary, Berlin, Germany

Purpose:
   To provide comments regarding proposed PAR on "Privacy considerations for IEEE 802 Technologies" (IEEE privecsg-15-0006-00-0000)
and CSD in "Privacy Recommendation PAR Proposal" (IEEE privecsg-15-0004-02-0000).

Notice:
   This document represents the views of the author and is offered as a basis for discussion.

Comments on Privacy Recommendation PAR and CSD

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Abstract

- This contribution offers comments regarding the proposed PAR, per:

  - PAR in "Privacy considerations for IEEE 802 Technologies" (IEEE privecsg-15-0006-00-0000)

  - CSD in "Privacy Recommendation PAR Proposal" (IEEE privecsg-15-0004-02-0000).

Comment: Dates

- The PAR form dates are blank. Dates are consensus-based decisions to which participants may be sensitive. These must be discussed and agreed as part of the technical decision to submit a PAR. They are not editorial issues.

Comment: Working Group

- The Working Group is indicated as: "Privacy Recommendation EC Study Group (C/LM/PrivacySG)." This is not a valid Working Group.

- Proposed change:

  - Name an existing Working Group, or a new one.

  - Suggestion: 802.1 Working Group

Comment: Title

- Extraneous language in the title follows format that has generally been abandoned within IEEE 802.

- Proposed change:

  - Title: Recommended Practice for ~~Information technology-- Telecommunications and information exchange between systems-- Local and metropolitan area networks:~~ Privacy considerations for IEEE 802 Technologies.

Comment: Scope (part 1)

- Scope refers to "general recommendations", but the project will be of little use without specific recommendations.

- Proposed change:

  - Title: This document specifies a privacy threat model for IEEE 802 technologies and provides ~~general~~ recommendations for standards developers and implementers on how to protect against privacy threats.

Comment: Scope (part 2)

- Scope refers to "recommendations for standards developers," but the remainder of the PAR and CSD have no indication that the recommendations are relevant to the development of standards within IEEE 802. Is an intent to make recommendations on how IEEE 802 standards should be amended? If no, then "for standards developers" should be deleted from the scope. If yes, then the rest of the PAR and CSD should be aligned (including but not limited to, the "Stakeholders,""Broad Market Potential," and "Technical Feasibility" elements).

Comment: Purpose

- The language mentions "recommendations to address privacy threats" and mentions some threats, but it does not explain the purpose of the recommendations. Presumably, the recommendations will mitigate the threats if adopted. But to whom are the recommendations addressed? To which users, designers, standards groups, implementers, or network elements will the recommendations be applicable? This is not apparent, and, without an understanding of the answer, it is difficult to understand the purpose.

Comment: Stakeholders

- See comments regarding Scope and Purpose.

Comment: CSD Coexistence

- The response "A CA document is not applicable because this project does not use wireless spectrum." could be understood to mean that the standard is not applicable to wireless networks.

- Proposed change:

  - A CA document is not applicable because this ~~project~~ **standard** does not ~~use~~ **specify** wireless ~~spectrum~~ **operation**.

- Smart-aleck remark: The criterion is not applicable because it applies only to a WG proposing a project, not to a Study Group proposing a project.

Comment: CSD Broad Market Potential

- "Broad Market Potential" refers to "numerous users." But who are the users of the recommendation? For example, if standards developers are potential users of the recommendation, which standards developers are potential adopters?

Comment: CSD Technical Feasibility

- The response indicates that "The recommended practice will define recommendations that can be followed by system designers and implementers," but the Scope refers to "recommendations for standards developers and implementers." Which is it: system designers or standards developers?

Comment: CSD Economic Feasibility

- The response does not address economic feasibility.

- Increased privacy has economic benefits to some parties and is an economic threat to others. These issues should be articulated.