From:	Frank Farance
To:	Hall, Travis; [redacted] Frank Farance
Cc:	iotrfc2016
Subject:	Dept of Commerce, Internet of Things: Inadequate announcement call for comments
Date:	Tuesday, May 24, 2016 9:05:00 AM
Attachments:	fr_rfc_iot_04062016.pdf

On 2016-05-23 17:13, Frank Farance wrote:
> DEPARTMENT OF COMMERCE
> National Telecommunications and Information Administration
> [Docket No. 160331306–6306–01]
> RIN 0660–XC024
> The Benefits, Challenges, and Potential Roles for the Government in Fostering the Advancement of the Internet of Things
>
> I will have my comments for you tonight.
>
> -FF

Travis Hall:

Here are my *administrative* comments: I only received notice of this call for comments on Friday afternoon via a colleague on the NIST Big Data Working Group. I believe this call for comments was poorly announced because I am involved in various standards activities on Internet of Things, Smart Cities, Cloud Computing, Home Electronics, etc. and this announcement was not made available to the US industry via standards committees (ANSI, INCITS, IEEE, EIA/TIA, etc.). In other words, merely publishing in the Federal Register does NOT constitute proper announcement for US industry in the field of information technology.

Considering the importance of these comments and their intended effect upon government involvement, regulation, and administration of Internet of Things, and the existing technologies and consensus building in standards committees in progress, I request that you extend the call for comments for two months more and provide appropriate announcements to the above US standards committees and other IT standard-setting organizations.

Note: I am merely representing myself, I am not representing any of those standards development organizations. Separately, I will submit a technical paper in a couple weeks that provides *technical comments* on the topic at hand. I have CCd several colleagues in standards committees, but they are not necessarily a complete list. Possibly, ANSI might have a more complete list of relevant standards-setting organizations within the US.

-FF
[redacted]

[Excerpt of "https://www.ntia.doc.gov/files/ntia/publications/fr_rfc_iot_04062016.pdf"]

DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
[Docket No. 160331306–6306–01]
RIN 0660–XC024
The Benefits, Challenges, and Potential Roles for the Government in Fostering
the Advancement of the Internet of Things

AGENCY: National Telecommunications and Information Administration, U.S. Department of Commerce.

ACTION: Notice, request for public comment.

SUMMARY: Recognizing the vital importance of the Internet to U.S. innovation, prosperity, education, and civic and cultural life, the Department of Commerce has made it a top priority to encourage growth of the digital economy and ensure that the Internet remains an open platform for innovation. Thus, as part of the Department's Digital Economy Agenda, the National Telecommunications and Information Administration (NTIA) is initiating an inquiry regarding the Internet of Things (IoT) to review the current technological and policy landscape. Through this Notice, NTIA seeks broad input from all interested stakeholders—including the private industry, researchers, academia, and civil society—on the potential benefits and challenges of these technologies and what role, if any, the U.S. Government should play in this area. After analyzing the comments, the Department intends to issue a "green paper" that identifies key issues impacting deployment of these technologies, highlights potential benefits and challenges, and identifies possible roles for the federal government in fostering the advancement of IoT technologies in partnership with the private sector.

DATES: Comments are due on or before 5 p.m. Eastern Time on May 23, 2016.

ADDRESSES: Written comments may be submitted by email to iotrfc2016@ntia.doc.gov. Comments submitted by email should be machine-readable and should not be copy-protected. Written comments also may be submitted by mail to the National Telecommunications and Information Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW., Room 4725, Attn: IOT RFC 2016, Washington, DC 20230. Responders should include the name of the person or organization filing the comment, as well as a page number on each page of their submissions. All comments received are a part of the public record and will generally be posted to http://www.ntia.doc.gov/category/internetpolicy-task-force without change. All personal identifying information (for example, name, address) voluntarily submitted by the commenter may be publicly accessible. Do not submit confidential business information or otherwise sensitive or protected information. NTIA will accept anonymous comments.

FOR FURTHER INFORMATION CONTACT: Travis Hall, National Telecommunications and Information Administration, U.S. Department of Commerce, 1401 Constitution Avenue, NW., Room 4725, Washington, DC 20230; telephone (202) 482–3522; email thall@ntia.doc.gov. Please direct media inquiries to NTIA's Office of Public Affairs, (202) 482–7002.

SUPPLEMENTARY INFORMATION: Background: As part of the Department of Commerce's Digital Economy Agenda, the National Telecommunications and Information Administration (NTIA) is requesting comment on the benefits, challenges, and potential roles for the government in fostering the advancement of the Internet of Things (IoT).

Description of IoT and its Impact on the Economy: IoT is the broad umbrella term that seeks to describe the connection of physical objects, infrastructure, and environments to various identifiers, sensors, networks, and/or computing capability.1 In practice, it also encompasses the applications and analytic capabilities driven by getting data from, and sending instructions to, newly-digitized devices and components. Although a number of architectures describing different aspects or various applications of the IoT are being developed, there is no broad consensus on exactly how the concept should be

defined or scoped. Consensus has emerged, however, that the number of connected devices is expected to grow exponentially, and the economic impact of those devices will increase dramatically.2 While some types of devices will fall into readily identifiable commercial or public sectors in their own right—for example, implantable health devices—most will serve the function of enabling existing industries to better track, manage, and automate their core functions. The potential health, safety, environmental, commercial, and other benefits of IoT are enormous, from reducing the risk of automobile-related injuries and fatalities to enabling micro-cell weather forecasting. IoT has the potential to catalyze new user applications and give rise to new industries. For example, IoT is the foundation for "Smart Cities" efforts, which use pervasive connectivity and data-driven technologies to better manage resources, meet local challenges, and improve quality of life.

However, the IoT also presents challenges,3 which in turn have begun to generate initial thinking and policy responses both inside and outside of government. A number of Federal agencies—for example, the National Highway Traffic Safety Administration (NHTSA) and the Food and Drug Administration (FDA)—have already begun grappling with potential health, safety, and security issues arising from the connection of cars and medical devices to the Internet.4 The Federal Trade Commission (FTC) has identified privacy and cybersecurity aspects of IoT, and proposed some possible best practices.5 Pursuant to the White House Smart Cities Initiative, the U.S. Government is providing $35 million in new grants and nearly $70 million in new spending on Smart Cities across several departments.6 Additional activities at the federal level seek to take advantage of the potential opportunities as well as address any possible issues raised by the deployment of IoT in relation to agency missions. IoT has also garnered interest by other national governments, standards organizations, and intergovernmental organizations that are interested in understanding how to engage in the IoT ecosystem to encourage economic growth and innovation.7 Unfortunately, country specific strategies threaten the possibility of a global patchwork of approaches to IoT, which would increase costs and delay the launch of new products and services, dampening investment. The U.S. government will need to work with stakeholders to develop industry-driven solutions; however, thus far no U.S. government agency is taking a holistic, ecosystem-wide view that identifies opportunities and assesses risks across the digital economy.

The Department's Digital Economy Initiatives: More than six years ago, the Department created the Internet Policy Task Force (IPTF) to identify and address leading public policy and operational challenges in the Internet ecosystem. The IPTF collaborates across bureaus at the Department, seeks public comment, and has produced policy papers on a variety of important topics. In recognition of the broad impact that the Internet and digitization are having across the economy, in 2015 the Department created the Digital Economy Leadership Team (DELT). Comprised of senior officials from across the Department, the DELT provides high-level guidance and coordination, leveraging the substantial expertise within the agency to promote initiatives that have a positive impact on the digital economy and society. The DELT currently focuses on the four pillars of the Department's 2015–16 Digital Economy Agenda: promoting a free and open Internet worldwide; promoting trust and confidence online; ensuring Internet access for workers, families, and companies; and promoting innovation in the digital economy. Working closely together, the DELT and IPTF ensure that the Department is helping businesses and consumers realize the potential of the digital economy to advance growth and opportunity.

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