March 13, 2017

Dear Dr. Hall,

We commend the Department of Commerce (Department) for the work in developing the Green Paper on Fostering the Advancement of the Internet of Things (IoT) and investigating the role of government. We agree with the statement in the Executive Summary that for emerging technologies such as IoT, the role of government should largely be to encourage private sector leadership in technology and standards development while using a multi-stakeholder approach to policy making.

We agree with the principles and engagement areas described in the Green Paper. We believe the Green Paper is comprehensive in describing the issues, challenges and benefits of IoT and provides appropriate next steps to foster the advancement of IoT.

Given Illinois’ transformation to a Smart State and the roles we believe a Smart State should have, we do have further recommendations for the Department to consider. The recommendations are described below, following a review of the three roles of a Smart State.

As communicated in our response to the original Request for Comments, Illinois is undergoing a transformation to a Smart State. IoT is key to this transformation in helping drive the three roles necessary for a Smart State which are (i) Government Efficiency (ii) Economic Growth and (iii) Demand Aggregation.

**IoT for Government Efficiency:** Helping make government more efficient, effective and accessible by using information and communications technologies such as the Internet of Things and Big Data analytics. Driving better service to Illinois citizens and businesses, our customers.

**IoT for Economic Growth:** Supporting and facilitating entrepreneurship, innovation, talent
development and investment in the Internet of Things industry, by improving policy and the regulatory structure that fosters economic growth.

**IoT for Demand Aggregation (suburban and rural areas):** Aggregating the demand by clustering of cities and regions allowing shared services and benefits of IoT to accrue to all towns and cities in Illinois. This should achieve cost savings for cities and regions and is particularly helpful for those rural areas that do not have the resources as well as enough demand to attract the private sector to deploy Smart City solutions.

We believe these roles can be mirrored at the national level and with this in mind we have the following further recommendations.

1. As first highlighted in our response to the Request for Comments, we continue to recommend a Deputy CTO position at the White House to foster the advancement of the Internet of Things in the USA. This can also be achieved by naming a specific position within the Department. The idea is to drive national IoT efforts in a coordinated and secure manner.

2. We believe further emphasis should be placed on “IoT for Government Efficiency” at the federal level, thus supporting use of IoT by federal agencies, with the goal of making government more efficient, effective and accessible, and driving better service to citizens. We recommend more specific next steps to encourage use of IoT for Government Efficiency.

3. For the “Demand Aggregation” role, we support further emphasis and research on clustering of cities and regions allowing shared services and benefits of IoT to accrue to disadvantaged communities. We recommend specific next steps regarding Demand Aggregation, similar to Illinois’ efforts of using the state’s fiber network and procurement authority as platforms.

4. We support research funding directed towards IoT, with particular emphasis on the challenges that arise due to the scale of IoT, as evidenced by the number of connected devices expected to come online in the near future. For example, issues of security and privacy, as highlighted in the Green Paper, are greatly magnified by the scale of IoT.
We continue to welcome the opportunity to contribute on this topic as a thought leader and a practitioner and we certainly support any collaboration between Illinois and the US to advance the Internet of Things. Please don’t hesitate to contact me if you have any questions on our response.

Sincerely,

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