This position paper is being sent on behalf of the OASIS Open Command and Control (OpenC2) Technical Committee(TC)[1] in response to the National Telecommunications and Information Administration (NTIA) Request for Public Comment on "Software Bill of Materials (SBOM) Elements and Considerations" [2] to help NTIA fulfill Executive Order (EO) on Improving the Cybersecurity of the Federal Government (14028) [3]. We thank NTIA for this opportunity to comment on this important task.

This paper addresses NTIA Question 2 on use cases and Question 3g on SBOM delivery.

In the operational considerations section of the request for comment, NTIA quotes the EO on the benefits of automation. The OpenC2 TC notes that meeting the EO objectives will require vendor-agnostic, machine-speed cyber-defense automation. OpenC2[4] is a standardized language for the command and control of technologies that provide or support cyber defense and is ideally suited to meet NTIA needs in this area. The OpenC2 TC thanks the NTIA for recommending OpenC2 for sharing and transferring SBOMs[5]. The OpenC2 TC requests NTIA continue to support the use of OpenC2 for SBOM delivery, and that NTIA consider OpenC2 in use cases where actions are necessary (e.g. sending commands to other devices as result of SBOM analysis).

Thank you for the opportunity to input into the process.

This document was unanimously approved at the 16-June-2021 meeting of the OASIS OpenC2 TC.

Footnote References:

[1] OASIS Open Command and Control (OpenC2) Technical Committee https://www.oasis-open.org/committees/tc_home.php?wg_abbrev=openc2
[2] Federal Register https://www.federalregister.gov/documents/2021/06/02/2021-11592/software-bill-of-materials-elements-and-considerations
[3] Executive Order 14028, Improving the Nation's Cybersecurity, May 12, 2021, https://www.federalregister.gov/documents/2021/05/17/2021-10460/improving-the-nations-cybersecurity
[4] OpenC2 https://openc2.org/
[5] Sharing and Exchanging SBOMs https://www.ntia.gov/files/ntia/publications/ntia_sbom_sharing_exchanging_sboms-10feb2021.pdf