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To: [counter_botnet RFC](#)
Subject: Comments on Promoting Stakeholder Actions Against Botnet and other Automated Attacks
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Comments to National Telecommunications & Information Administration
US Department of Commerce by Internet Public Trust, Layton Olson, Facilitator, on

Promoting Stakeholder Actions Against Botnet and other Automated Attacks
July 26, 2017

Commenter recommends strengthening connections among Data Security Application Developers, Security Managers, and Civil Society, both on technical and consensus-building conversation processes, to prepare a Civic-centered data-driven very local to regional framework that is understandable to the public and public safety agencies, as well as to security managers for an annual calendar of review of Data Privacy and Data Security service improvements, and in times of localized and wider business, government and public utility emergencies, such as actions against botnet and other automated attacks.

Principles and goals

Commenter recommends NTIA

1 Adopt User and Local Community Centric, (US Department of Commerce) Digital Economy, FEMA public-private Community Response and similar design goals, systems and procedures to reduce the impact of Botnet and other Automated Attacks and to increase end user prevention and capacity building, including through coordination of regular calendars of public and private Community Anchor Institution communication with Local Data Privacy and Security Community Forums, and inclusion of such networks and other Smart State Local networks in emergency communication and consumer technical support networks.

2. Work with Big Data universities, State and local governments, Utilities and Community Anchor Institution Business Enterprises, including local Community Media, in the definition and development of a common set of local to multi state regional Civic (public and demand side) Community Response and Resiliency areas and networks as uniform Building Blocks for improving and sharing communication and sensor data in the Digital Age, including with varying levels of cybersecurity needs. This People + Technology cooperation platform would be anchored in seasonal and emergency calendars of activities and physical community events affecting every (1) habitation areas in a utility substation area, (2) school enrollment and library service area, (3) local commerce (ZIP) and public safety area, (4) community college and health district area, (5) multi county regional planning agency areas. This local-regional platform would coordinate with Critical Infrastructure cybersecurity planning and management in regional and multi state economic and subcontinental watershed resiliency areas, including in concert with NTIA/US Department of Commerce and USDA/RUS Digital Economy area planning, US Department of Transportation state-local transportation and utility area planning and FEMA public-non profit Community Response area services, including 911, 311, 811 and 211, and other Critical Infrastructure planning area parties.

Reviewing 'What Works' Best Practices

In reviewing 'what works' in developing and maintaining People + Technology Platforms and networks which directly

assist residential, business, community institution, utility, and public institutions directly and through public and community media, commentor recommends reviewing

1. design Civic or Community-centric standards and procedures developed through university design school and community engagement activities involving overlapping technology, business and civic engagement models, all supported by Big Data and information decision science tools linked to Local Area as well as Wider Area decisions.
2. models of multi stakeholder consumer mass process service management and quality improvement of combined digital and personal interaction intensive services, including models with decades of experience in local and regional service quality assemblies such as in education mass process services, such as ACT and ETS/College Board.
3. models of Digital Economy (Innovation and Skill Cluster) area, Small Business , ZIP, and Census and American Community Survey area models of Department of Commerce, anchored in about 2000 community college and health district areas of 100,000 to 200,000) in 56 states and territories.
4. models of inclusion of cross sections of residents, businesses, community and public Institutions, including through archived keypad polling and communities speak techniques, in Federally recognized regional planning areas for land use, transportation, and public Infrastructure in mid range and long range planning with access to Big Data universities and services.
5. models of engagement with Family, Business, Civic and Public stakeholders involved with development and implementation of FCC National Broadband Plan of 2010 and 7 National Needs for Broadband, and the NTIA-RUS Broadband infrastructure and services model building. The FCC national needs model includes the 2 process needs of Improving Government Performance and Civic Engagement and social productivity, both of which are building blocks of cooperating (and sometimes consolidating) of governance, including public utility governance among water, power, electricity, natural gas, communication, road and easement parties. The other 5 national needs (health and life sciences, education and skills, jobs and economy, energy/transportation/environment, and public safety are further defined in advanced application areas, such as those of NSF-support US-Ignite Connected Communities and University-Developer advanced applications, NSF 4 Regional Big Data Hubs.
6. models of smart state local government anchored in coordinating IT networks and services among state and local governmental units, including increasing cooperation and consolidation of governance networks, and including major elements of expanding uniformity of cybersecurity, and the development of real time, near real time, daily and other regular dashboard tools for Digital Economy and Community Response areas.

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Smart Communities Testbed Proect

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Safe and Healthy Communities*

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