



National Telecommunications and Information Administration  
US Department of Commerce  
1401 Constitution Avenue N.W.,  
Room 4725, Attn: IOT RFC 2016,  
Washington, DC 20230

June 2, 2016

**RE: Request for public comment on “The Benefits, Challenges, and Potential Roles for the Government in Fostering the Advancement of the Internet of Things” | Docket No. 160331306-6306-01 | RIN 0660-XC024)**

To Whom It May Concern:

We are grateful for the opportunity to comment upon this document. Our present recommendations focus only on the administration of the discussion on the Internet of Things (Iot):

1. We recommend reference to, and conformity with, the National Technology Transfer and Advancement Act (NTTAA) with which, since the National Institute of Standards and Technology is a division of the Department of Commerce, the NTIA should already be familiar. The education facilities industry has been a beneficiary of the public-private partnerships that the NTTAA catalyzed.
2. We recommend reference to, and conformity with, OMB Circular A-119 which has the practical effect of giving the private sector a first chance to write IoT standards and regulations, if any.
3. Break up any proposed regulation in small pieces to the furthest extent possible. When proposed regulations are drafted too long, the review tends to favor only those interests who have the resources to respond -- typically incumbent interests who can finance their advocacy in the product or service that they sell to the education industry.

We hope these recommendations will inform the national discussion of this important technology. As you can see from our website – we are very active in regulatory product development:

<http://standards.plantops.umich.edu/>

<http://standards-michigan.plantops.umich.edu/>

We hope to continue participation with the NTIA discussion on the IoT transformation in the future.

Respectfully,

A handwritten signature in black ink that reads "Mike". The letters are cursive and somewhat stylized, with a large 'M' and 'i'.

Michael A. Anthony  
Senior Manager of National Infrastructure Standards Strategy

Cc: Richard Robben, Christine Fischer, Ronald Loveless (University of Michigan)