



July 28, 2020

via supplychaininfo@ntia.gov

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Associate Administrator for Office of Policy Analysis and Development
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW, Room 4725
Washington, DC 20230

Docket Number: 200609-0154

RIN 0660-XC046

RE: Request for Comments on Promoting the Sharing of Supply Chain Security Risk Information

COMMENTS OF THE RURAL WIRELESS ASSOCIATION, INC.

The Rural Wireless Association, Inc. (“RWA”)¹ submits these comments in response to National Telecommunications and Information Administration’s (“NTIA”) request published in the Federal Register on June 12, 2020² seeking comment on how it should promote the sharing of supply chain security risk information as required by the Secure and Trusted Communications

¹ RWA is a 501(c)(6) trade association dedicated to promoting wireless opportunities for rural telecommunications companies who serve rural consumers and those consumers traveling in rural America. RWA’s members are small businesses serving or seeking to serve secondary, tertiary, and rural markets. Each of RWA’s member companies serves fewer than 100,000 subscribers.

² Federal Register, Vol. 85, No. 114, pp 35919-35922 (June 12, 2020) (Federal Register Notice); *see* <https://www.ntia.doc.gov/files/ntia/publications/fr-rfc-promoting-sharing-supply-chain-security-risk-information.pdf>.

Networks Act of 2019.³ As mandated by the Secure Networks Act, on July 8, 2020, NTIA announced the creation of its information sharing program, the Communications Supply Chain Risk Information Partnership (C-SCRIP).⁴

I. C-SCRIP’s Mandated Regular Briefings Should Be Easily Accessible to All Providers and Vendors

The Secure Networks Act requires that C-SCRIP conduct regular briefings to share information with trusted providers of advanced communications services and trusted suppliers of advanced communications equipment or services.⁵ These briefings should be easily accessible to *all* providers and vendors, especially rural providers who lack substantial resources to participate in regularly scheduled briefings and are spread across four time zones. Allocating time and resources has been even more difficult for rural providers given the COVID-19 pandemic and the increased work load put upon these essential workers. For instance, C-SCRIP could make these briefings available online and recorded so that rural providers could access the important supply chain security information at any given time and C-SCRIP could provide a live chat service for real time interaction.

II. C-SCRIP Should Engage with Trusted Providers and Suppliers Through Trade Associations When Feasible

The Secure Networks Act also requires that C-SCRIP engage with trusted providers and suppliers and, in particular, those that are small businesses or primarily serve rural areas.⁶ As rural providers have limited resources, it would be more efficient for C-SCRIP to disperse this

³ Pub. L. 116-124, 133 Stat. 158 (2020) (“Secure Networks Act”).

⁴ NTIA, Establishment of the Communications Supply Chain Risk Information Partnership, 85 FR 41006 (July 8, 2020). <https://www.govinfo.gov/content/pkg/FR-2020-07-08/pdf/2020-14725.pdf>.

⁵ *Id.*, Section 8(a)(2)(A).

⁶ *Id.*, Section 8(a)(2)(B).

critical information to rural providers and vendors through trade associations such as RWA, NTCA – The Rural Broadband Association (NTCA), the Competitive Carriers Association (CCA), and others. These trade associations can much more easily disseminate this security information to small and rural providers and vendors, whom they are in more regular contact with, than C-SCRIP. Additionally, trade associations such as RWA already have mechanisms in place to facilitate this dissemination of supply chain security information. For example, RWA has a Rural National Security Council that is focused on national security and supply chain issues, an Education Committee that facilitates monthly webinars for its members to educate and inform them on important issues and a newly formed Technology Committee to allow carriers and vendors to work through novel technology and technical issues. RWA could use any one of these member-focused groups as vehicles to disperse this critical supply chain security information to its members and other trade associations may have similar mechanisms to easily disseminate this information. Webinars (live and recorded) are especially efficient during this COVID-19 pandemic while most people continue to work remotely.

III. NTIA Should Expedite and Expand the Provision of Security Clearances as Much as Possible

Under the Secure Networks Act, NTIA is required to both declassify material, when possible, and expedite and expand the provision of security clearances to facilitate information sharing.⁷ NTIA needs to ensure that the process for obtaining a security clearance is time-efficient for rural carriers and providers as they do not have the extra resources for a time-consuming process. For company employees that are obtaining a security clearance, it would be

⁷ *Id.*, Section 8(a)(2)(C)(i-ii).

a best practice for the company representative to work in either the company's information technology division or in its network security department. As some of the IT and network security work is outsourced to vendors and consultants, NTIA should make the process for obtaining a security clearance time-efficient for them as well.

IV. NTIA Should Consider a Rural Wireless Provider Appointee for CSRIC

The Secure Networks Act requires that the Commission's Communications Security, Reliability, and Interoperability Council ("CSRIC") appoint a member who represents the interests of the public and the consumers.⁸ As there is not a current member on CSRIC that represents a rural wireless provider, NTIA should consider such an entity in appointing its new member on CSRIC and its working groups.

V. NTIA Should Clarify its Interpretation of the Definition of "Trusted" Provider or Vendor

Under Section 8(c)(4) of the Secure Networks Act, the term "trusted" provider or vendor is defined as a provider or vendor of advanced communications service or equipment that NTIA has determined "is not owned by, controlled by, or subject to the influence of a foreign adversary." NTIA should clarify its interpretation of this definition. Does the determination by NTIA involve a screening process or is it simply that if you are not determined by NTIA to be owned by, controlled by, or subject to the influence of a foreign adversary then you are trusted? If there is a screening process involved to become a trusted provider or vendor, NTIA should consider implementing a short process that is not overly time consuming because rural providers

⁸ *Id.*, Section 8(b)(1).

and vendors, many times, lack the resources to divert their attention away from operating their networks as demand for broadband continues to be substantial during this pandemic.

Respectfully submitted,

RURAL WIRELESS ASSOCIATION, INC.

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