From:	Kirill Sinitski
To:	counter_botnet_RFC
Subject:	Re: Promoting Stakeholder Action Against Botnets and Other Automated Threats
Date:	Friday, June 09, 2017 2:19:03 PM

Dear Department of Commerce,

I am particularly glad to see these initial steps in securing IoT. I like to describe existing situation as follows: In IoT S stands for Security (hint: there is no S).

I see robust certification regime as the only possible solution. Power supplies used to catch fire and electrocute consumers, then certification became mandatory and the problem is now considered resolved. The same approach should be used with IoT, require certification as a pre-requisite to selling IoT to consumers. It is also unnecessary to develop additional frameworks when an internationally recognized framework of Information Technology, ISO/IEC 15408 (Common Criteria) already exists. The National Information Assurance Partnership (NIAP) oversees a national program, CCEVS, to evaluate IT products according to Common Criteria with a healthy network of evaluation laboratories. Coordinate with NIAP to develop IoT Protection Profile and start certifying devices.

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