JEITA Japan Electronics and Information Technology Industries Association

June 25, 2020

# Re: JEITA's Comment in Response to NTIA request for public comment on Implementation Plan for the National Strategy to Secure 5G

RIN: #0660-XC047

Dear Mr. Hall,

Japan Electronics and Information Technology industries Association (JEITA) appreciates the opportunity to submit our response to NTIA's request for comment, on behalf of the Executive Branch, on developing an Implementation Plan for the National Strategy to Secure 5G (hereafter the "5G Strategy Plan").

JEITA represents Japan's leading information and communications technology (ICT) companies. Our vision is to promote safe and healthy manufacturing, international trade and consumption of electronics products and components in order to contribute to the overall development of the electronics and ICT industries, and thereby further Japan's economic development and cultural prosperity. JEITA's membership comprises companies that operate in every layer of the 5G segments such as semiconductor and network equipment designers and manufacturers, software and digital services providers, and those that will harness 5G to evolve their businesses.

There is no doubt that 5G will be a very important key driver for realizing our policy goal "Society 5.0," which is a human-centered society that balances economic advancement with the resolution of social problems by a system that highly integrates cyberspace and physical space. We support the US government's policy of promoting development and deployment of 5G in cooperation with partners around the world. Further, we appreciate the comprehensive nature of the National Strategy to Secure 5G: all Four Lines of Efforts are imperative to ensuring U.S. leadership in 5G.

JEITA believes that development and deployment of top-quality 5G in a timely and efficient manner will hinge on the use of open interfaces that enable interconnectivity/interoperability among the best products developed by equipment vendors. Through 4G, the specifications for data carried at network level, control signals, and other elements vary from a vendor to vendor, and integrating multiple equipment from different vendors requires technical adjustments each time. Developing products that are compliant with open interfaces will be essential in rolling out 5G infrastructure quickly at a reasonable price.

## Line of Effort 1: Facilitate Domestic 5G Rollout

1) *How can the United States (U.S.) Government best facilitate the domestic rollout of 5G technologies and the development of a robust domestic 5G commercial ecosystem (e.g., equipment manufacturers, chip manufacturers, software developers, cloud providers, system integrators, network providers)?*



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It took close to 10 years to realize full 4G rollout, and this might be the case for 5G rollout, too. Technologies will continue to evolve and advance during the 5G rollout period. To ensure that the 5G infrastructure allows the various 5G carriers and private 5G systems to connect with each other seamlessly and readily substitute their products, it is essential to avoid vendor lock-in by adopting common architecture agreed among the stakeholders both in public and private sectors.

4) *What areas of research and development should the U.S. Government prioritize to achieve and maintain U.S. leadership in 5G? How can the U.S. Government create an environment that encourages private sector investment in 5G technologies and beyond? If possible, identify specific goals that the U.S. Government should pursue as part of its research, development, and testing strategy.*

We strongly recommend prioritizing the design and development of an architecture which facilitates participation of various vendors rather than the one with fewer participation of specific vendors. Also, using advanced software technologies and cloud computing for resource allocation with control by Artificial Intelligence (AI) is of high importance, thereby going beyond the existing concept of “network.”

## Line of Effort 2: Assess Risks to and Identify Core Security Principles of 5G Infrastructure

1) *What factors should the U.S. Government consider in the development of core security principles for 5G infrastructure?*

Cooperation and coordination among transworthy countries or partners are indispensable to develop the core security principles for 5G infrastructure. Polices promoting encryption technologies that can secure security and protect privacy are warranted in the coming era of quantum computing.

## Line of Effort 4: Assess Risks to and Identify Core Security Principles of 5G Infrastructure

3) *What tools or approaches could be used to mitigate risk from other countries’ 5G infrastructure? How should the U.S. Government measure success in this activity?*

To ensure robust 5G security worldwide, it is vital that the U.S. and other partners update with each other on the latest security situation and share the best practices by establishing a multilateral forum or framework. It is essential to build an open and competitive supply chain among companies in some countries or regions that have secure and reliable 5G infrastructure is critical.



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