



National Telecommunications and Information Administration
U.S Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: **Fostering the Advancement of the Internet of Things**

The Computing Technology Industry Association (CompTIA) is a non-profit trade association serving as the voice of the information technology industry. With approximately 2,000 member companies, 3,000 academic and training partners and nearly 2 million IT certifications issued, CompTIA is dedicated to advancing industry growth through educational programs, market research, networking events, professional certifications and public policy advocacy.

CompTIA submitted comments in response to NTIA's Request for Comment last spring on "The Benefits, Challenges, and Potential Roles for the Government in Fostering the Advancement of the Internet of Things," and we appreciate the opportunity to do so again in response to the IoT green paper. CompTIA is encouraged by NTIA's analysis in the green paper. It paints an accurate portrayal of the IoT landscape and lays out an excellent set of initiatives to help foster the IoT industry going forward.

The green paper focuses on several key aspects of IoT, and recommends approaches that we think will be best for both the industry and users of IoT products. CompTIA has long-stated that any governmental approach to fostering IoT should focus on broadband infrastructure deployment, spectrum availability, security, and privacy, and the paper echoes that exact sentiment. Further, we have stressed that IoT-specific regulation is premature, and that IoT privacy and security policy can and should be led by industry, and we appreciate NTIA's endorsement of this position.

CompTIA wholeheartedly agrees that increased broadband infrastructure deployment and modernization of legacy networks will be a key driver in the growth of IoT. We support a private-sector led approach to broadband deployment, but acknowledge that the free market alone will not provide the proper incentives for companies to deploy and improve networks in all areas. Public-private partnerships and the Universal Service Fund must also play a role in delivering broadband access to the entire country.

We hope that NTIA can effectively play a much-needed coordinating role between the private sector and federal, state and local governments to help get all parties onto the same page and hasten the deployment of new and improved networks. In particular, state and local tower siting regulations are not designed for the small cells necessary for 5G, and NTIA could help industry coordinate with state and local governments to revamp their laws.

CompTIA has worked on efforts to make more licensed and unlicensed spectrum available for commercial use for years, and NTIA is perfectly-positioned to facilitate future efforts to do so. The broadcast incentive auction represented perhaps the last significant repurposing of commercial spectrum for the foreseeable future, leaving federal spectrum as the clear target for future commercial use. Given NTIA's unique ability to assess both IoT spectrum requirements and incumbent federal spectrum usage, NTIA's role in spectrum management will only grow as it attempts to identify new bands for commercial use and innovative ways to use them. NTIA's Institute for Telecommunications Sciences (ITS) is already doing fantastic work in this space as a testbed for IoT spectrum use.

The green paper's approaches to security and privacy also conform with CompTIA's perspectives on these issues. In a world of rapidly-changing security threats, flexible, risk-based, technology-neutral security solutions are the best way to protect against outside threats. In the past we have opposed regulations that remove companies' discretion on how best to protect their own information and devices. Such regulations can often amount to a series of generic boxes to check without actually improving security, and we're glad that NTIA recognized this.

Our members support security-by-design, and believe that security policy should be industry-led. We agree with NTIA's stance that the government should avoid passing prescriptive security regulations and instead function largely as a convener of multistakeholder processes. NTIA's current process on upgrading and patchability is a perfect example of the role government should play, and CompTIA is excited to be a part of it. Further, we agree that educating consumers about their devices' potential security risks should be a top priority for industry, and we look forward to working with NTIA on this in the future.

Protecting user privacy is a huge priority for our members, and we support NTIA's promotion of the availability of strong encryption technologies. We also appreciate its acknowledgment that only a portion of IoT devices are consumer-facing, and that government should refrain from placing regulatory burdens on devices that are unlikely to pose privacy-related risks.

In general, CompTIA supports NTIA's conclusions that government should largely avoid regulation in this space for the time-being, and that industry should take the lead in developing policies and best practices for IoT. The industry is simply growing and changing too rapidly to put static regulations in place that could hinder innovation or prove irrelevant five years from now. We look forward to continuing to collaborate with NTIA to help foster the growth of the IoT industry.