

August 16, 2015

Online Trust Alliance
Bellevue, WA
admin@otalliance.org

Proposed IoT Trust Framework
Attn: Comments

Dear Sirs:

This comment is regarding article #7 of the proposed rule framework.

Article #7

Personally identifiable data must be encrypted or hashed at rest (storage) and in motion using best practices including connectivity to mobile devices, applications and the cloud utilizing Wi-Fi, Bluetooth and other communication methods. As a best practice the goal is to achieve end-to-end encryption of all personal data. Note this would not apply to direct wired connections of the device. This requirement requires the use of current encryption technologies solutions currently being deployed by industry.

The above rule #7 should be suggested for operation in United States, as there are several countries which do not allow for transmissions of encrypted data within their borders. The framework should address the international implications of the framework, and when, where how, the framework can be modified to suit foreign country laws. Internet and mobile products are used worldwide suggested privacy rules need to allow for a company be compliance in the United States while also following laws in individual country's privacy laws.

Sincerely,

David Prokop
CEO
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