Comments on OTA's PROPOSED MINIMUM REQUIREMENTS – IoT TRUST FRAMEWORK

from Jeff Stollman

The document appears to lack applicability to many (most) IoT devices. I suggest that this be made clear. Specifically,

1. It fails to acknowledge the distinction between IoT devices that are sensors, processors, actuators, or applications. Only IoT devices that have processors appear to be subject to the requirements.
    a. Sensors, be they continuous sending or store-and-forward devices are unlikely to have the capability or need to comply to these requirements
    b. Actuators, are similarly just responding to commands from a processor.
    c. Processors may be subject to the framework.
        i. Only IoT devices that have their own processors would appear to be subject to the requirements.
        ii. Even some IoT devices with limited processing capability (e.g., a smart coffee pot that includes its own clock function to trigger its operation) may not be subject to this framework.
        iii. Many IoT devices obtain their processing capabilities from general purpose computers (including smart phones). I suggest that it would be unreasonable to hold the makers of such general purposes computers responsible for compliance with the framework.
    d. Applications appear to be the true focus of the framework, though they are not referenced and are frequently not even considered part of the IoT "device."
        i. Regardless of where they reside (on the IoT device or on a general purpose computer), the applications should be the target of the framework.
        ii. Because it would be unreasonable for a smart phone maker to be held responsible for compliance of the myriad apps that may be downloaded in order to interface with IoT sensors (e.g., Fitbit or Jawbone) or actuators (e.g., smart coffee pot or rice cooker), responsibility must reside with the app publisher.
        iii. Furthermore, the app publisher may or may not be the maker of the sensor or actuator.