

To: Craig Spiezel, Madelon Smith, OTA

Re: Comment Submission on IoT Trust Framework - IoTWG Discussion Draft

Trust is OTA's middle name. Likewise, the IoTWG's IoT Trust Framework sets the goal of "maximizing **consumer trust**". Arguably, consumer trust is a two-way street, implying synchronized participation on the part of both vendor and **consumer**.

I submit that it could perhaps add value to the IoTWG framework if some guidance was added as to how our best IoT practices might actually be delivered to and digested by the consumer. Requirement #1 suggests a short notice format, but stops short of articulating how that might work in actual practice.

I suggest that Framework language might be added to set forth the concept of **consumers' "best questions"**. To appreciate this concept, one needs to don one's consumer hat and look at IoT marketplace through the consumer's eyes. If you were a consumer considering using (investing your trust in) a class of IoT products (or in a particular branded product within the class), what would be the very **best questions** you could ask of the vendor as you form your buying decision? What questions would/should a pro ask? What questions should/would a responsible, trust-building vendor want you to ask?

I believe that OTA's thought leadership position qualifies it to source best questions built on the bedrock of FIPPS/best practices inherent in the Framework. Today, online, cloud-based technology can:

1. Gather and organize **best questions**, producing a standardized **survey document** targeted to a specific IoT context, or to a specific product SKU.
2. Present the **survey document** to a vendor for structured completion of answers to consumers' best questions.
3. Give the vendor an opportunity to include summary product features, benefits, and points of trust from vendor's standpoint. Ideally, the survey acts to promote digital trust by synchronizing vendor/consumer understanding and expectation.
4. Automatically organize and format information from the completed survey into a consumer-friendly, highly graphic, privacy **BRIEF**, optimized for consumer understanding. The BRIEF is not a privacy policy (although a properly-configured BRIEF will provide instant links to a vendor's full policy on demand).
5. Display the resultant privacy BRIEF on any platform at any time, cued from a simple URL reference (e.g. QR code on IoT packaging).

I suggest that this **best question-based BRIEF** style of providing "a short notice on product packaging, point-of-sale materials as well as a link to online privacy policy" could perhaps be mentioned in conjunction with Requirements #1 or #2.

Full disclosure: On September 15th, PrivacyCheq plans to introduce a new product named Privacynq to the IoT marketplace. The product is designed to deliver consumer-friendly privacy information to consumers as it builds vendor/consumer digital trust.

Thanks for your leadership in this important step forward in consumer privacy, and the opportunity to comment.

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