



Symantec's Comments on OTA IoT Trust Framework

As a member of the Online Trust Alliance, Symantec appreciates the opportunity to offer these comments on the Online Trust Alliance's IoT Trust Framework. We are at a crucial point in the development of the IoT, and it is essential that security be a foundational consideration as the development of the IoT and of connected devices accelerates. The Trust Framework is an excellent starting point for ensuring that this happens, and we appreciate OTA's focus on this issue.

We support the Trust Framework's focus on security by design and are pleased that it recognizes the need for a flexible approach to security given the breadth of devices that will make up the IoT. Significantly, the Trust Framework recognizes the need to secure both the devices themselves and the vast amounts of data that they will generate. We have two suggestions for improving the document:

- **First**, group the recommendations by type. For instance, the first six are all focused on the policy and governance realm and are distinct in kind from the later, more technical recommendations. We suggest at least two categories – policy/governance and technical requirements, though we could also see creating a third group focusing on privacy and data security.
- **Second**, add a little more clarity with regard to hardening devices. In particular we believe the Trust Framework should include as best practices both secure boot (requiring firmware to check that the system boot loader is cryptographically signed) and runtime security (controls ensuring applications run securely).

We recognize that some devices may not be amenable to every hardening technique, but the market needs to move towards wider usage of these tools and including them as best practices in the Trust Framework would be a significant step in making this happen. This is particularly true in the case of life-critical devices and systems, and in these situations the Trust Framework should call for higher levels of security and more to steps to harden devices.

We thank you for your work in developing the Trust Framework, and would be pleased to discuss our recommendations in more depth. We look forward to working with you as you move the Trust Framework forward. Should have any questions or want further information, please contact Jeff Greene at (202) 383-8700 or at jeff_greene@symantec.com.