Before the
Federal Trade Commission

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In the Matter of Internet of Things	)
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COMMENTS

OF

THE INTERNET COMMERCE COALITION.

Jim Halpert, General Counsel
Sydney White, Counsel
500 8th Street, NW
Washington, DC 20004

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Federal Trade Commission

In the Matter of Internet of Things Workshop

Comments of the Internet Commerce Coalition

The Internet Commerce Coalition ("ICC") welcomes the Commission's Internet of Things Workshop. The ICC's members include leading Internet and e-commerce companies and trade associations: Amazon.com, AOL, AT&T, Comcast, eBay, Google, Monster.com, Verizon, TechAmerica and US Telecom.

The Internet of Things offers tremendous potential benefits for consumers, and should be welcomed by policymakers. The FTC should be very cautious about proposing regulation of this sector, given its importance to innovation in America. The Commission should examine new technologies and their connectedness against the backdrop of existing privacy frameworks that focus on data uses and not on the underlying devices or technology enabling those uses. Privacy and security issues are important here in the same way that they are important in other contexts involving automated data collection and use, and do not warrant a unique set of rules.[1]

What is more, the private sector is making significant progress on end- to-end security standards for the Internet of Things. For example, in the mobile space, there are a wide variety of standards bodies working on security standards for M2M. This includes "oneM2M" which is a standards body that was established in 2012 with the goal "to develop technical specifications which address the need for a common M2M Service Layer that can be readily embedded within various hardware and software, and relied upon to connect the myriad of devices in the field with M2M application servers worldwide". oneM2M has over 250 member companies, including AT&T and most of the major US carriers, and the scope of their work includes technical specifications including for security and privacy aspects of M2M (authentication, encryption etc.) and involve liaison relationships with other standards bodies such as 3GPP, BBF, HGI and the ITU-T.

The Telecommunications Industry Association (TIA), Consumer Electronics Association (CEA) also are working on M2M standards. And the Cloud Security Alliance (CSA) has published several recommendations for security the cloud which is relevant to M2M in that several M2M applications are being deployed in the cloud. More broadly there is ongoing mobile security standards work at various industry organizations including 3GPP, GSMA, ATIS,

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[1] Further, cyber-security issues related to the Internet of Things are within the purview of the inter-agency cyber-security process, which has the greatest expertise in addressing cyber-security.

IETF and CTIA. And industry is working with government in variety of venues on mobile security including at NIST, DISA and DHS.

As with other big data solutions, data from the Internet of Things can provide huge consumer and societal benefits in such areas as improving health care outcomes and making energy usage more efficient. As with most other privacy frameworks, where data are reasonably de-identified and not used in personally identifying form, the privacy issues raised by use of these data are eliminated. Similarly, the context principle articulated in the White House privacy white paper is a reliable guide regarding application of the FIPPs in industry best practices.

For all these reasons, we look forward to working constructively with the Commission to examine Internet of Things applications in the Workshop.

We thank you for considering our views.

Sincerely,

Jim Halpert, General Counsel
(202) 799-4441