

April 26, 2024

Barbara Cuthill IoT Advisory Board Secretariat Information Technology Laboratory National Institute of Standards and Technology 100 Bureau Drive Gaithersburg, MD 20899 barbara.cuthill@nist.gov

RE: Support for Incorporating Privacy Information on Monroney Stickers

Dear Ms. Cuthill,

I strongly support the IOTAB recommendation to include privacy information on Monroney stickers for new and used vehicles. As Managing Partner at ObscurelQ where I advocate for consumer privacy and as a Data Privacy Researcher at PrivacyPlan, I can tell you consumers want and need this transparency about data practices when they purchase vehicles.

Sunlight

Consumer trust and safety need repair. Sunlight will help with that most of all. It will help the automobile industry, though they may not realize it yet.

The visibility of basic privacy details regarding data use on Monroney stickers will significantly empower consumers.

Choice

Transparent disclosure of how consumer personal data in connected vehicles is collected, utilized, shared will let consumers make an informed choice. The choices they make today are uninformed. There is currently no "notice and choice" in the automobile industry.

Transparency versus minimization

Automobile manufacturers should be practicing data minimization. But this isn't really about the data collection. It's about transparency. Let's hope that transparency gets more manufacturers to think hard about data minimization. What we know for sure though is that transparency can improve consumer trust and safety, which are paramount in our digital age.

This recommendation directly aligns with my advocacy for transparent privacy measures.

Enhancement of the Maroney stickers would give consumers a straightforward mechanism by which to understand how the personal data gathered by their vehicles can affect their lives.

In my previous presentation to the IoTAB in 2023, I emphasized the importance of privacy safeguards in IoT's location data realm. Bringing more transparency is a logical and necessary progression in personal data use in IoT. Adopting this recommendation will bolster individual privacy transparency and allow consumers to make informed decisions about automobile purchases.

A shining example

I urge the Department of Commerce and the IoTAB to prioritize this recommendation in its final report. This will solidify consumer trust in the automotive industry. Right now the industry is getting an F in data privacy. Let's change that overnight and make them a shining example of how to do data privacy and transparency correctly.

Thank you for your leadership. I look forward to continued collaboration on these important privacy initiatives.

Sincerely,

Jeff Jockisch Managing Partner ObscureIQ (<u>www.ObscureIQ.com</u>) Data Privacy Researcher, PrivacyPlan LinkedIn Top Voice