



October 6, 2021

National Institute of Standards and Technology (NIST)  
Attn: Applied Cybersecurity Division, Information Technology Laboratory  
100 Bureau Drive (Mail Stop 2000) Gaithersburg, MD 20899-2000  
Email: [iotsec@nist.gov](mailto:iotsec@nist.gov)  
*Submitted electronically*

Re: Deloitte<sup>1</sup> NIST Cybersecurity White Paper “Baseline Security Criteria for Consumer IoT Devices” comments

Dear Sir/Madam:

Deloitte appreciates this opportunity to submit comments regarding the cybersecurity whitepaper entitled “Baseline Security Criteria for Consumer IoT Devices”.

Deloitte is one of the largest professional services organizations in the US, and our presence is extended globally through the Deloitte Touche Tohmatsu Limited network of member firms. We provide a vast array of services to clients focused on the security of IoT devices in the marketplace. We serve a well-rounded group of both US-based and global clients such as medical technology companies (including medical device manufacturers), consumer companies (including hospitality and manufacturing organizations), health care providers, automotive manufacturers, energy and gas providers, pharmaceutical/biotechnology companies, and other companies that are part of the IoT device security value chain at the intersection of technology, risk, and regulation. As a result, we have a specialized perspective on important issues that arise, such as cybersecurity in connected medical devices, and in-depth knowledge of the IoT device security landscape across industries.

Deloitte supports NIST’s continued furtherance of cybersecurity in IoT Device Security. “Baseline Security Criteria for Consumer IoT Devices” should assist manufacturers, organizations, and companies in developing comprehensive IoT security programs to ensure their devices are increasingly more secure in the face of rapidly evolving threats and vulnerabilities. Please see a full, detailed list of comments in the attached comment form.

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<sup>1</sup> As used in this document, “Deloitte” means Deloitte & Touche LLP, a subsidiary of Deloitte LLP. Please see [www.deloitte.com/us/about](http://www.deloitte.com/us/about) for a detailed description of our legal structure. Certain services may not be available to attest clients under the rules and regulations of public accounting.

Again, we appreciate the opportunity to comment on the “Baseline Security Criteria for Consumer IoT Devices” whitepaper. In the event that the provided comments will be circulated outside the NIST review group, we ask that Deloitte be notified prior to distributing materials. Should you have questions regarding our comments, please contact us.

Sincerely,

Veronica Lim,  
Principal, Deloitte & Touche LLP