The comments below represent informal feedback provided by the IoT Federal Working Group to the IoT Advisory board to support the February 2024 meeting. These comments are in response to the December 2023 draft report, which was itself preliminary and under development. The IoTFWG recognizes that the IoTAB represents an independent steering committee and the suggestions herein are not intended to prescribe or

General Comments

Need to ensure that the report has a very compelling theme such that federal agencies who will have to implement this will understand how to prioritize these needs over other technology investments that they have.

Concern over the fact that much of the content represents interesting topics, some good ideas, but knowing that readers have hundreds of other things to worry about, without some sort of really compelling argument, will see these as "just another unfunded mandate". A strong call to action is needed.

Some of the topics did not represent things that members felt were inherently US government-related activities, whether because of lack of authority or just the sense that those have not historically been a role that

All who have read the January report recognized that it was too long, both in page count and in items to consider. The next update will need to be much more easily consumed and understood. The end result must be under 150 pages with all appendixes (one member said the recommendations section should be limited to 20-30

Many readers could not really understand what the problem is that the Board is trying to fix. As above, many did not understand why the government should adopt many of these recommendations and, if they are worthwhile, why they have not already been taken on in private sector.

For many of the recommendations, there are not sufficient metrics or performance measures to define success. That may cause the report to have less merit, or could enable some not to fully achieve the intent of the Board.

Be cautious about using the terms standard or standardization. Be more clear about what the recommendation is. For example, when using the term "standards", does the Board really mean a formal "Standard" or does it just mean some other expectation?

Observation - less of a change request: there has already been a great deal of work in standards that doesn't seem to be reflected in the report.

There are references to IoT devices when it appears the Board means more than just the devices (e.g., IoT systems). Make it clear when the Board means "IoT systems or ecosystems" vs specifically devices.

Look for opportunities to better co-locate similar items.

Recommendations need to be concise, clear, and actionable. Having the USG "consider" is not an action or having the U.S. "lead" is not actionable because U.S. leadership isn't necessarily up to the U.S. – others would have to come along and accept our leadership.

In the introduction, IoT devices are described as always having a wireless connection between the sensor and processor. While this is probably the case for the majority of devices, presumably some are could be hard-wired or connected via wired technologies. Not sure if the Board is intending to limit the 'things' that comprise IoT to

Supply chain logistics as they relate to IoT seems to be under-represented.

There was some mixing of terms, supply chain logistics, supply chain management, and there's also third party logistics. Be specific and direct regarding what's meant: Is it the bigger supply chain logistics? Is it the piece of supply chain management? What is it and what are they doing with it?

More Specific Considerations

Members had a negative reaction to the notion of the government "monetizing data". Some saw the message as "industry leading government" and felt that's probably the wrong message to send, and cautioned against doing so. That seems like a role for private industry. If the goal is for government to study and recommend ways to better encourage data sharing in an equitable way, it may be more palatable if we refrain from discussing

It seems that working group members recognized that may be a disincentive for those who are making money from closely holding data to share it. It makes sense to look for ways to encourage more collaborative data production and data usage, but tying it to money and funding may distract from the point.

There were many concerns about the government housing a repository and requiring non-government entities to share data.
There was some discussion about cases in the past there the government has asked to "own" the data. This seems to be different from the notion of a government data warehouse of some sorts where anybody can have
The crux seems to be about what data is publicly owned and paid for vs the government storing data of private orgs. Similarly, working group members felt that few private sector companies would be open to turning over their data to the government.
Be cautious of asking agencies to develop standards. They will often work with helping to monitor groups and help develop consensus standards for high-level things like Wi-Fi, but it is rarely an agency task to create
There was a question about whether we need to call out AASHTO? There are many others, including those specific to transportation, and it may be better not to single any out.
The Board uses the term *autonomous vehicle* . For some, that specific term may be antithetical to the concept of connected and IoT. Consider pointing to automated vehicles or automated transportation. Autonomous to us talks about standing on its own, and so if there's an opportunity to change AV to automated vehicle versus
Regarding the narrow band satellite recommendation, there was some confusion. I believe that is recommended for removal; if it stays, be sure to be clear that the recommendation was **not** to promote new satellite specifically for AG IoT but rather to leverage existing satellite communications.
Review NTIA's release of the National Spectrum Strategy and the accompanying Presidential Memorandum for developments to consider incorporating into the report and recommendations.
Rather than speaking about "allocations" of spectrum, which would only apply to licensed spectrum, a more general reference to identifying all types of spectrum "that can be used" would be more appropriate.
There are many references to the cybersecurity labeling program, which is still only in the proposal stage at this point. A considerable number of questions/issues will need to be addressed in the (anticipated) final order, so the Board should use caution not to presume the Mark program is firmly established. There are a number of places in the "trust" section where they are recommending building off the cybersecurity labeling program to accomplish other goals. Members urge a little more cautious approach here.
Regarding the mark program, is the Board recommending a similar approach for industrial products and industrial devices? Is there a suggestion to extend the proposed program into the industrial space?
Regarding the stockpile of public safety IoT devices, as written, this is not an action that the federal government would engage in. The recommendation does not address specific interoperability challenges, and the 3 public safety entities listed have significantly different operational requirements. Interoperability is a concern, but having the federal government acquire devices brings up a myriad of implementational and logistical concerns.
We urge the Advisory Board to protect the integrity of the CET process by modifying the recommendation that IoT **must** be added back to the critical and emerging technology list. Agencies and White House offices prepare and update this list periodically through an NSTC-run interagency process. It would be inappropriate for an advisory board to insert their own favored technology to the list. I recommend a modification to: "Agencies and OSTP should **strongly consider** IoT for the critical and emerging technology list."