



March 6, 2019

The Honorable Dereck E. Davis
Chair, House Economic Matters Committee
Maryland House of Delegates
231 House Office Building
6 Bladen Street
Annapolis, MD 21401

Dear Chair Davis:

On behalf of CTIA, the trade association for the wireless communication industry, I write in opposition to House Bill 1276, which would mandate that connected device manufacturers equip those devices with certain features. This bill is unnecessary in light of the wireless industry introducing CTIA's Internet of Things (IoT) Cybersecurity Certification program that protects consumers and wireless infrastructure nationally, while also creating a more secure foundation for smart cities, connected cars, mHealth and other IoT applications. The program is the first of its kind to be developed in collaboration with the nationwide wireless providers.

CTIA announced the IoT Cybersecurity Certification program¹ in August 2018 and began accepting applications in October. Leading wireless providers, technology companies, security experts, and test labs collaborated to develop the program's test requirements and plans. The program builds upon IoT security recommendations from the National Telecommunications and Information Administration (NTIA) and the National Institute of Standards and Technology (NIST).

The program accepts all IoT devices that connect to a cellular network and validates whether they meet a set of security features. Device manufacturers may seek one of three types of certification, depending on the sophistication of the device and the security characteristics desired or needed for its use.

For more than 25 years, CTIA's Certification Working Groups have developed and managed product test plans and certification requirements for devices, networks, and other wireless technologies, with over 70,000 certification requests handled to date by over 100 CTIA Authorized Test Labs. These programs ensure interoperability between wireless devices and networks, as well as set standards for a secure, high-performing, and innovative wireless ecosystem.

These types of industry programs are preferred to legislative mandates, such as HB1276, as they provide the industry the flexibility to quickly respond to changes on the cybersecurity front. This flexibility is vitally important to address any security concerns that

¹ See https://api.ctia.org/wp-content/uploads/2018/10/ctia_iot_cybersecurity_pmd_ver-1_0.pdf.



may arise in a quickly changing field. For these reasons, CTIA respectfully asks that you not move HB1276.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerard Keegan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gerard Keegan
Vice President
State Legislative Affairs