

**UNITED STATES DEPARTMENT OF COMMERCE**  
**OFFICE OF THE SECRETARY**  
**NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY**  
**INTERNATIONAL TRADE ADMINISTRATION**  
**NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION**

***Cybersecurity, Innovation and the Internet Economy***  
**Docket No. 100721305-0305-01**

**COMMENTS OF .ORG THE PUBLIC INTEREST REGISTRY**

**September 20, 2010**

.ORG The Public Interest Registry appreciates the opportunity to respond to the *Cybersecurity, Innovation and the Internet Economy* Notice of Inquiry. In our response, we note one overarching issue – the one of the term “cybersecurity” itself.

***Concerns Regarding “Cybersecurity” Terminology and Responsibility***

“Security” is a multi-faceted term with many nuances and meanings. It is commonly understood as a degree of protection against danger, damage, loss and criminal activity. Rarely in common discussion or regulatory discussion do we speak of “security” as an isolated term because it is so broad. Security is a public issue, a private issue, a national issue, a commercial one and a personal one.

We note that such differentiation has not taken place among security issues on the Internet. One word, “cybersecurity,” seems to represent the whole range of security issues online. In this NOI alone, the word “cybersecurity” is used over 80 times, not including footnotes and official titles. It is used across a very broad range of issues that, outside the Internet, would be represented by an array of separate security terms.

***Steps the Internet Policy Task Force might take***

PIR respectfully submits that the Internet Policy Task Force take care to adopt a “cybersecurity” vocabulary that carefully discriminates among the many security issues that are of concern to the Internet. Such discrimination should distinguish those issues where the responsibility is appropriately left to private interests, e.g., “cybersquatting” and DNS-CERT, and those where governmental or other regulatory interests may be involved.

Such a step is always important at the expansion of a new technology, and fosters a more inclusive, informed and focused dialogue.

Respectfully submitted,

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