

From: Kathleen Moriarty <Kathleen.Moriarty@cisecurity.org>  
Sent: Monday, October 18, 2021 4:08 PM  
To: E0-pilots  
Subject: IoT Document feedback

High-level comment: Please consider including the CIS Critical Security Controls for Internet of Things as a resource. Controls Version 8 is largely aligned to the recommendations provided in this NIST specification, however the controls are more prescriptive and prioritized according to current threats. This may serve as a resource as a result due to the alignment and complementary aspects of the documents. <https://www.cisecurity.org/white-papers/internet-of-things-security-companion-to-the-cis-critical-security-controls/>

Specific comments for consideration:

Asset Identification: Asset inventory is the baseline for any security control management framework and is important. Challenges may be presented as a result of privacy efforts in standard development organizations (SDOs), where anonymization has been built-in to product identifiers. Efforts might include the IEEE randomization of MAC addresses that has been standardized. There may be privacy laws that limit tracking requirements to an organization with employee agreements for instance.

Logical Access to the Interfaces: The controls largely align to NIST SP 800-207. Would a reference be useful to the ZTA tenets?

Software Update: Will there be any requirement for a software manifest that is digitally signed?

Best regards,  
Kathleen

Kathleen M. Moriarty  
Chief Technology Officer  
Center for Internet Security  
+1 (518) 516-3064  
[www.cisecurity.org](http://www.cisecurity.org)  
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