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**Subject:** Comment for DRAFT Baseline Security Criteria for Consumer IoT Devices

Thank you for publishing the excellent draft paper. I have one comment.

Page 4, Software Update: Perhaps it is covered elsewhere, but since some devices allow updates via a physical interface (like USB, serial, or firmware programmer), devices should provide a mechanism for validating those updates. If the device provides a debug port (for field support access or troubleshooting), the port should provide some physical safeguards to prevent unauthorized access. This is also relevant for the Data Protection section.