

**Subject:** [pnt-eo] Comments from SAE on NISTIR 8323: Cybersecurity Profile for the Responsible Use of Positioning, Navigation and Timing (PNT) Services  
**Date:** Monday, November 23, 2020 at 3:43:32 PM Eastern Standard Time  
**From:** pnt-eo@list.nist.gov on behalf of Woodward, William  
**To:** pnt-eo@list.nist.gov  
**CC:** Dorothy Lloyd  
**Category:** Purple Category, Red Category  
**Attachments:** image001.jpg

To whom it may concern,

I only have one comment/concern, and that is the introduction of GNSS in this document without alerting the reader that non-US GNSS is not traceable back to UTC USNO. I could not find any reference in the document to GNSS time not being traceable to UTC USNO or under US control. Technical Report ITU-T GSTR-GNSS is referenced and Section 1.3.2 covers GNSS Time; unfortunately, the only example it provides is US GNSS or GPS and then states that "other GNSS systems are comparable". They might be comparable, but they can't be traced back to UTC USNO, which is a problem for cyber security.

A goal of UTC is to have every country participating on the same time standard; unfortunately, that is not the case and the use of the term "UTC" was a problem during the balloting of the SAE eLoran standards. As you know, UTC USNO and UTC NIST are not exactly the same, but they're kept in very close agreement, typically to within 20 nanoseconds, and both can be considered official sources for time in the United States.

It has been my experience, that very few people are aware that GNSS time might not be traceable back to UTC USNO.

GNSS is a time source, but your reader's need to be aware of the potential dangers associated with using non-US GNSS as a time source.

To align with US Policy, time must be based on USNO UTC and the reader should know that GNSS does not align with US Policy and is not traceable to UTC USNO.

Best regards,  
Bill Woodward  
Chair, SAE PNT Committee

**Bill Woodward, P.E.** | Senior Engineer  
4429 Bonney Road, Suite 400, Virginia Beach, VA 23462

[www.wbbinc.com](http://www.wbbinc.com)



"Quality Comes Standard"

The information contained in this electronic message and/or its attachments is intended for the named recipient(s) only. The electronic message and/or its attachments may contain confidential, nonpublic or privileged information disclosure of which is restricted by applicable law, including the federal securities laws.

If you are not an intended recipient, or the employee or agent responsible for delivering this message to the intended recipient(s), do not copy, distribute or rely on the information contained herein. If you have received this message in error, please notify the sender immediately by reply and immediately delete this message and any attachments. Unless otherwise noted, any views expressed in this message and/or its attachments are those of the author and do not necessarily reflect the views of WBB, Inc or its staff.

--

To unsubscribe from this mailing list, send email to [pnt-eo+unsubscribe@list.nist.gov](mailto:pnt-eo+unsubscribe@list.nist.gov)

View this mailing list at <https://list.nist.gov/pnt-eo>