

Comment Template for: Draft Profile of Responsible Use of Positioning, Navigation, and Timing

Please submit responses to: pnt-ao@list.nist.gov by November 23, 2020

Comment #	Organization Name	Submitted By (Name/Email)	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested Change	Type of Comment (General/Editorial/Technical)
1	OPNT	m.johnson@opnt.nl				General comment 1: While not clear if intended, this document does not seem to explicitly and/or consistently indicate that there will also be sector-specific PNT Profiles, which seems to be called for in the EO and required for effective execution. i.e. from EO "Within 1 year of the date of this order, the Secretary of Commerce, in coordination with the heads of SSAs and in consultation, as appropriate, with the private sector, shall develop and make available, to at least the appropriate agencies and private sector users, PNT profiles. The PNT profiles ...".	Suggest being clear on the intent and then carefully going through document looking for and clarifying such cases including consistent naming (e.g. the Profile vs the PNT Profile, etc)	General
2	OPNT	m.johnson@opnt.nl				General comment 2: Seemingly missing from a critical process-flow point of view, believe there needs to be recognition of the need to identify and capture specific PNT requirements, often with variation across sectors. E.g. "for mobile operators, the phase synchronization at the radio antenna must be at and verifiable within +/-1.5 microseconds from the national (global) metric/source, abc". Believe such requirements gathering and capturing actions should be itemized in the "process flow" of this profile. From that framework-based position, the critical requirements and values should then be captured over time within sector-specific PNT profiles, consistent with overall needs statement included in this foundational one.	Though not sure where best to place it within the detailed sections of the document, suggest something along the lines of "Identify and capture critical PNT requirements needed to ensure (minimum?) continuity of operation/service at all times, including avoidance of negative impacts on others"	General and Technical
3	OPNT	m.johnson@opnt.nl	42	541	4.2.6	Very strongly suggest addition of a PT-6 item focused on continuous, realtime, real network checking capability/technology. e.g. continuous over-the-air monitoring of mobile network's wireless transmissions to proactively identify cases where improper timing is present from one radio maybe negatively impacting others. E.g loop arounds verifying that accurate time was both delivered to end points and is being utilized by those end points. These are focused on key question associated with answering the very difficult timing/sync related question of "how do you know"? Traceability is a part of it toward having confidence back to the source. Loop back and other closed-loop mechanisms that incorporate the end user are also extremely powerful and increasingly required to adequately ensure valid end-to-end operation. I anticipate the need that much specific attention is needed within the different per-sector PNT profiles in this area.		General and Technical

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6	349	3.2	Per second general comment above associated with requirements, wondering if the Framework Core is where reference to requirements might be made.	E.g. add something along the lines of "identification and capture of critical requirements, toward providing criteria for success"	General and Technical
4	305	2	Per second general comment, a potential place to add another line referencing requirements	e.g. add something like: What are the PNT requirements?	General and Technical
1	253	1.2	Wondering if is inappropriate/insufficient to not also include the source PNT signal generators and providers. E.g. when there is a requirement of national time, does the NMI come into play?. Placeholder comment at the moment		General
			The following ones are potential clean-up cases of general comments 1 and 2		
ii	92	Abstract	EO indicates PNT Profile per sector, whereas wording in abstract seems to indicate (or could be interpreted as such) a single profile	edit, change to plural: is required to produce "Profiles" to address the responsible use of PNT services	Editorial
ii	94	Abstract	Seemingly the word "profile" missing in the sentence, plus believe valuable to indicate as a foundation to other profiles	edit: This PNT Profile serves as the foundation for the broad and varied stakeholder community using PNT services.	Editorial
ii	99	Abstract	Continuation of the general comment that sector-specific PNT Profiles will follow, suggest adding that to last sentence	with edit: from which further sector efforts and associated PNT Profiles are expected to develop based on the use of this foundational Profile	Editorial
1	229	1	Wording appears to say a single PNT Profile, whereas the EO indicates multiple PNT Profiles, one per sector. That should be clarified, potentially with also stating the role of this one (Cybersecurity foundation?)	with edit: The Executive Order (EO) directs the Department of Commerce to develop PNT Profiles for each critical infrastructure sector for users of PNT services	Editorial
1	224	1	Per first general comment above, question of whether change title here to add the word Cybersecurity. Maybe not necessary if adequately clarify in following paragraphs	??? 1 Cybersecurity PNT Profile: Introduction	Editorial
1	230	1	Per first general comment above associated with multiple PNT profiles, indicate plural	Adding plural: The Executive Order (EO) directs the Department of Commerce to develop PNT Profiles for users of PNT services.	Editorial
1	233	1.1	Another case of general comment one, including potential confusion on this being the only profile. Maybe here define for this document this cybersecurity-focused profile as "the Profile", vs doing it later, to then consistently use from this point onward.	suggest edit per: The purpose of this PNT Profile focused on cybersecurity (hereafter, the Profile), when used as part of a risk management program, is to help organizations manage cybersecurity risks to systems, networks, and assets that use PNT services.	Editorial
1	239	1.1	Another general comment one item, what PNT Profile referring to in this case? If this cybersecurity one which is assumed, suggest remove PNT from this line	with edit: Use of the Profile will help organizations to:	Editorial

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1	240	1.1	Per second general comment above associated with PNT requirements, suggest add an additional "Use" associated with clarifying and capturing requirements	e.g. add something like the following after line 240: "Identify and capture critical PNT requirements"	Editorial
2	284	1.3	Per earlier identification, suggesting take care of the "hereafter" point in line 233. suggested edit has it removed, along with "PNT"	The Profile is intended for a general audience and is broadly applicable. The Profile applies to organizations that	Editorial
4	292	2	As per previous comments, The Profile vsThe PNT Profile. Believe should be consistent omitting "PNT", with this talking about the foundational Cybersecurity PNT Profile, previously hereafter identified as "the Profile", not "the PNT Profile"		Editorial
4	293	2	The Profile? The PNT Profile. Many cases of this throughout		Editorial