



July 22, 2011

National Institute of Standards & Technology  
c/o Annie Sokol  
100 Bureau Drive  
Mailstop 8930  
Gaithersburg, MD 20899

Re: Docket NO. 110524296-1289-02; Models for a Governance Structure for NSTIC

Dear Ms. Sokol,

On behalf of the Online Trust Alliance, I would like to commend the National Institute of Standards & Technology and the National Strategy for Trusted Identities in Cyberspace (NSTIC) program office for driving this important initiative and discussion regarding governance.

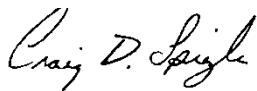
OTA's recommends sound principles and tenets be established to serve the best interests of consumers as well as issuing and relying parties. The following tenets are suggested providing representation, objectivity, resiliency and agility with the goals to empower decision making capabilities. Models must be designed to be transparent and flexible not only for the initial phase but also for long-term sustainability and relevance.

1. Representative - The Steering Committee is recommended to have designated "seats" to represent key vertical markets and constituencies. Such verticals should include but not be limited to: financial services, ecommerce, healthcare and government services. In addition, it is recommended other designated constituencies include: consumer, privacy, identity, online trust and security advocates and subject matter experts. Rotation of designated seats, with the possibility for annual renewals should be considered to allow a broader set of stakeholders to be engaged and represented.
2. Transparency, Respect, Openness & Vendor Neutrality - Steering committee members must demonstrate a commitment towards these goals, to help avoid the risk of self-serving agendas. A conflict of interest policy is recommended for a condition of membership including a process for potential removal for any such violations.
3. Agility and Flexibility - The structure should be designed to be flexible with the ability to add new stakeholders and change others as the identity model evolves. Start small, build over time.
4. Revolving Leadership with Term Limits - It is expected the Steering Committee will include an Executive Committee. It is recommended such leadership shall rotate among key constituents with term-limits to help provide balance, integrity and credibility.

5. Create A Sustainable Funding Model - It is proposed membership pricing be set where it is not an insurmountable barrier to participation, but one to help keep distracters at bay yet keeping stakeholders committed. A similar model to be considered might be the W3C, where fees vary depending on the annual revenues. Waiving of fees could be provided to qualified non-profits (non-trade organizations) and academia. It is anticipated such fees would be a small portion of the overall budget with the bulk coming from licensing and / or trustmark fees. It is assumed initial funding including (both direct and indirect support) would be provided by government seed funding. It is envisioned initially the NSTIC program office would provide structure and operational support and over a period of time move to a peer stakeholder status coinciding with the organization being self-funded.

OTA looks forward to our continued involvement in this important program. Trusted identities are the keystone of online trust and confidence and critical to our economy and the vitality of online communications, transactions and services.

Respectfully,



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