



July 21, 2011

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

Dear Sir / Madam,

The Open Group is very supportive of the NSTIC effort, and I am writing to provide input on behalf of the members of The Open Group to the NSTIC NOI. Our input takes the form of some suggestions relating to the specific questions posed in the NOI below. We believe our operational model and international scope puts us in a uniquely qualified position to contribute to the governance of the NSTIC.

I have also prepared a background section, which may be useful in understanding how we are organized, our background in standards development and in identity and security issues, and our capabilities in the areas of: 1) developing and running consortia, and 2) developing and running conformance programs for a variety of topics.

Regarding the establishment of a steering group, as a leading standards development organization, and one with significant experience in developing standards and certification programs in the general area of IT, and specifically in identity management, and one whose substantial membership represents both the consumer and vendor communities, The Open Group is interested in helping to form such a steering group, and we are interested in participating directly in such a steering committee. With our long experience in building consensus and developing standards and conformance programs, we believe that we have much to offer in this area. In addition, as referenced in our specific comments below on questions 4.1, 4.2, 4.3, and 4.4, given the highly international nature of The Open Group's activities, we can likely help the steering committee to achieve key objectives regarding international involvement and engagement.

One of the key groups within The Open Group is the Jericho Forum. This group is comprised of thought leaders in the areas of security and identity. The Jericho Forum have recently published a set of "Identity Commandments", and they have a specific interest in having ongoing input to and dialog with NSTIC as it moves from the initial vision identified in the April 2011 document, towards practical standards and solutions that meet the principles outlined in the document. A pointer to the Identity Commandments is provided in the background section of this response. The Jericho Forum is providing a separate response to the NSTIC NOI, in order to elaborate on some aspects of NSTIC.

The Open Group's Security Forum and Identity Management Forums have also produced significant guidance and numerous standards in the area of identity over the last decade, all of which are freely available at our website.

In the following we provide responses to only those questions that we have specific responses to.

1.1. Given the Guiding Principles outlined in the Strategy, what should be the structure of the steering group? What structures can support the technical, policy, legal, and operational aspects of the Identity Ecosystem without stifling innovation?

Open Group input: It should have a balanced representation of both the user and the vendor stakeholder communities.

1.2. Are there broad, multi-sector examples of governance structures that match the scale of the steering group? If so, what makes them successful or unsuccessful? What challenges do they face?

Open Group input: There is the example of the North American Electric Reliability Corporation (NERC) which responded to the major electricity supply blackout across the north-east of the USA and Canada some years ago. This industry group produced successful standards and policies which they presented to the US and Canadian governments who adopted them so they acquired legal standing. We like this model, where an industry group came up with a model which government adopted.

2. Steering Group Initiation

No Open Group input.

3.1. What should the make-up of the steering group look like? What is the best way to engage organizations playing each role in the Identity Ecosystem, including individuals?

Open Group input: Our experience in running consensus forming groups with broad sets of constituents suggests that key stakeholder groups should be given representation, either individually or through a collective group, to the steering committee. As an example, given The Open Group's broad representation from customer and vendor organizations including large enterprises, state and national governments, and Universities, we are well-placed to provide input from this broad constituency of organizations to NSTIC.

3.3. What does balanced representation mean and how can it be achieved? What steps can be taken guard against disproportionate influence over policy formulation?

Open Group input: A balance between user and vendor stakeholders is essential, along with representation from legal and regulatory policy-makers through relevant government and regulation bodies. A consensus model for decision-making is essential.

4.1. How should the structure of the steering group address international perspectives, standards, policies, best practices, etc?

Open Group input: Our suggestion is that the steering group composition should deliberately include international standards development organizations from the outset. It will be important to the success of NSTIC to move technical standards that are developed into standards organizations

such as The Open Group, which can help to facilitate widespread adoption on a global basis, and to do the same with certification and accreditation activities. Organizations such as The Open Group can also help provide communication conduits to collect feedback from international organizations on NSTIC policies and standards, including other governments, vendors, and customers, and to provide the means to disseminate information from NSTIC to these groups.

4.2. How should the steering group coordinate with other international entities (e.g., standards and policy development organizations, trade organizations, foreign governments)?

Open Group input: As stated in 4.1, we would suggest direct representation on the steering group, or perhaps establishment of a liaison relationship with key international organizations.

4.3. On what international entities should the steering group focus its attention and activities?

Open Group input: Our input here would be to focus on those international standards organizations that can provide maximum reach globally to affected governments, enterprises, vendors, and individuals, and that have active international operations and activities, as these organizations will provide the most leverage for NSTIC. An example would be the OECD. Others would be EURIM, and the European Community.

4.4. How should the steering group maximize the Identity Ecosystem's interoperability internationally?

Open Group input: To help drive interoperability on an international basis, one suggestion might be for the steering group to consider hosting interoperability demonstrations at international conferences. The Open Group runs such conferences.

4.5. What is the Federal government's role in promoting international cooperation within the Identity Ecosystem?

Open Group input: We envisage the Federal Government's role will be as a facilitator and participant.

Thank you for considering our input to this important initiative. If you have questions regarding our input to the NSTIC NOI, I may be reached 303.495.3123, or j.hietala@opengroup.org.

Yours sincerely,

James Hietala
VP, Security
The Open Group

Appendix A

Background on The Open Group

The Open Group is a vendor- and technology-neutral consortium, whose vision of Boundaryless Information Flow™ will enable access to integrated information within and between enterprises based on open standards and global interoperability.

The Open Group works with customers, suppliers, consortia and other standard bodies to:

- Capture, understand and address current and emerging requirements, and establish policies and share best practices
- Facilitate interoperability, develop consensus, and evolve and integrate specifications and open source technologies
- Offer a comprehensive set of services to enhance the operational efficiency of consortia
- Operate the industry's premier certification service

The Open Group is a consortium with a foundation in its members: a diverse group that spans all sectors of the IT community – IT customers, systems and solutions suppliers, tool vendors, integrators and consultants, as well as academia and researchers.

Our members come from all over the world – 47% of come from North America, 34% from Europe, 12% from Asia-Pacific, and 7% from the Middle East & Africa. We are proud to have some of the largest IT buyers and vendors as active members, representing both government and commercial enterprises: Capgemini, Fujitsu, Hitachi, HP, IBM, NEC, US Department of Defense, NASA, and many others.

Our buy-side members alone have combined annual IT budgets of over US\$50 Billion or 25% of the entire IT procurement budget worldwide each year.

Why do all these organizations value membership in The Open Group? The Open Group provides opportunity to exchange information and shape the future of IT; members gain access to information and ideas on a level that they otherwise could not attain – from industry shaping events to academic research breakthroughs. And the flexible structure of The Open Group membership allows for almost any organization, no matter what its size, to join and have a voice in shaping the future.

1) Membership Specifics

The membership of The Open Group includes over 20,000+ active participants, from 350 organizations, with headquarters in 31 countries and 6 continents. Our membership includes governments, vendors, and customers. The Open Group maintains offices in the US, UK, Japan, Brazil, China, India, Sweden, France, South Africa, and the UAE.

2) Operations and Activities

Public conferences and co-located member meetings are frequently conducted by The Open Group in various parts of the world.

In the past twelve months, Open Group conferences and member meetings have been conducted in San Diego, CA USA, Austin, TX USA, London, UK, Pune, Hyderabad, and Chennai, India, Amsterdam, NL, South Africa, Abu Dhabi, China.

In the coming twelve months, conferences are planned to occur in Stockholm, Sweden, Brazil, Washington D.C., San Francisco, France, South Africa, Taipei, Taiwan, Europe, and SE Asia.

In 2009 The Open Group organization was recognized by the US Department of Defense as well qualified for its expertise, global reach and broad range of industry liaisons, to coordinate a study on supply chain risk on Acquisition Technology & Logistics. The outcome from this study was the formation of a new Open Group forum (see OTTF later in this section) – the Open Trusted Technology Forum – whose members are developing the valuable outcomes from that study.

The broad range of Open Group global liaisons with other industry groups are targeted at adopting and adapting the best solutions that are available to address IT challenges we continue to face. To this end our current liaison agreements include the CSA, DMTF, EURIM, OASIS, and OMG. We also have PAS submitter status to ISO JTC1 SC27, In addition our members are involved in many other industry and governmental groups worldwide, and they use their Open Group networking facilities to build informed understandings and consensus on requirements and directions for effective solutions.

3) Open Group Certification and Conformance Program Experience

The Open Group has built and operates certification programs for certifying people, processes, and products. The Open Group's approach is Making standards work®. The organization has extensive experience and a long track record in defining and evolving standards, building consensus, and developing best practices as well as operating certification programs and providing certification services to other consortia. The Open Group ensures that its certification programs are based on industry best practices and clear and well-defined certification policy and processes for achieving and maintaining certification.

Being technology- and vendor- neutral, The Open Group provides the industry with reliable assurance of conformance to standards, and serves as international guarantor of interoperability.

One of The Open Group's main objectives for developing certification programs is to simplify IT procurement. Through user and industry participation, The Open Group has produced product standards reflecting market requirements as an aid to procurers and established certification programs to provide assurance of conformance and interoperability.

Buyers of certified products:

- Get reliable assurance of conformance to standards, and interoperability
- Minimize need for conformance testing
- Simplify bid analysis, and reduce procurement document complexity, cost and risk associated with procurement

Suppliers of certified systems:

- Show their commitment and demonstrate that they stand behind their products, which gives confidence to the buyers
- Get access to a pool of major buyers who specify that the products they buy must be guaranteed to conform to the specifications

4) Security and Identity Related Fora and Working Groups, and Prior Work Relevant to NSTIC

The Open Group has several fora and working groups doing work in areas that relate to NSTIC. These are described below. Any involvement from The Open Group in the NSTIC steering group will consolidate the views and suggestions from these groups.

- The Security Forum focuses on Security Architecture and Information Security Management. The forum produces technical standards, guides, best practices, and other deliverables aimed at customer practitioners and vendors. The Security Forum over the years has produced many technical standards, guides, and best practices in the area of identity management, which are all available free of charge [here](#).
- The Jericho Forum® provides thought leadership on enabling businesses to securely collaborate in a deperimeterized world. The Jericho Forum produces position papers, requirements, and guidance for customer organizations and security vendors. In April, 2011, the forum produced their “Identity Commandments”, which relate to many of the principles and goals of NSTIC. This document may be accessed, along with all of the other Jericho Forum publications, [here](#).
- The Real-time & Embedded Systems Forum provides core technology suppliers, integrators and customers with dependability through assuredness in the development of secure, reliable systems using open standards. The Forum delivers whitepapers, technical API standards, guides, and evaluation and certification programs.
- The Open Group Trusted Technology Forum (OTTF) is developing a best practices framework for product engineering and development, supply-chain integrity, and evaluation. This framework is called the Open Trusted Technology Provider Framework (O-TTPF). The Forum is also working on marked accreditation and conformance programs for provider organizations that conform to the O-TTPF best practices.
- The Cloud Computing Work Group is doing work in the area of security for the Cloud and SOA. This group is working on a reference architecture for Cloud security.