



**Models for a Governance Structure for the National
Strategy for Trusted Identities in Cyberspace**

Prepared for:

**DEPARTMENT OF COMMERCE
Office of the Secretary**

National Institute of Standards and Technology

Response Submitted By:

**TecSec Services, Inc.
12950 Worldgate Drive
Suite 100,
Herndon, VA 20170**

Contact Person:

**Ron Parsons
RParsons@tecsec.com
Cell: 301-639-5510**

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What are the most important characteristics (e.g., standards and technical capabilities, rulemaking authority, representational structure, etc.) of the steering group?

It is ultimately the ability of the organization to affect interoperable, cost-effective, privacy enhancing identity management that will be the measure of success of this effort. To that end, it will not be practical to assume that a broad swath rule-making authority would be practical or even possible. What will be required for success is close cooperation with the key cross-cutting standards bodies and associations that represent the diverse markets. Awareness of the work from the Industry Standards groups, who are all addressing the same issues of; privacy, confidentiality, identity and overall security. Each market must be assured that their voice is heard and that the implementation within their sphere, although fully interoperable, has flexibility of implementation to allow for practical rollout and regulatory compliance, and recognition of multiple efforts avoids duplication and is not necessary.

**How should the government be involved in the steering group at steady state?
What are the advantages and disadvantages of different levels of government involvement?**

The government is a critical player, in fact it could be argued, the one stake holder that cross-cuts all of the industries. Government involvement in a manner that would reduce the barriers to implementation both within government and in interactions with private industry would accelerate adoption and success. The government must be actively involved, even in steady state, in the process of continually improving how it interacts with the private sector in full rollout. The Steering Group can become a uniquely qualified clearing house, used to publish and examine efforts from all industries for the common good.



Regarding Steering Committee Formats:

There are dangers in attempting to morph an existing organization for this purpose. First, every organization carries a perception within industry regarding their focus, efficiency, and polity. It must either be totally new, or if formed under an existing government authority, not be placed within an existing committee for the same reasons as mentioned above. Being of such a scale and needing to affect so many industries points to the possible need of legislative liaison.

Do certain methods of establishing the steering group create greater risks to the Guiding Principles? What measures can best mitigate those risks? What role can the government play to help to ensure the Guiding Principles are upheld?

There is always a danger in attempting to make a monolithic solution and then to attempt to force it on diverse industries. By taking a role that ensures adaption within the government first and then creating a framework for true interoperability, the government can be a critical catalyst. The government can enable technologies that are scalable and truly interoperable to flourish and thereby encourage multiple participants at every level (associations, industry partners, individuals, technology providers. That assurance of being interoperable and open to varying technical implementations will provide a foundation for this identity framework to flourish.