# Withdrawn Draft

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**Additional Information** 



1	Draft (2 <sup>nd</sup> ) NISTIR 8259
2	<b>Recommendations for IoT Device</b>
3	Manufacturers:
4	Foundational Activities and Core Device Cybersecurity
5	Capability Baseline
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17	https://doi.org/10.6028/NIST.IR.8259-draft2
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- 82 the cost-effective security and privacy of other than national security-related information in
- 83 federal information systems.

### 84 85

## Abstract

86 Internet of Things (IoT) devices often lack device cybersecurity capabilities their customers—

87 organizations and individuals—can use to help mitigate their cybersecurity risks. Manufacturers

can help their customers by improving how securable the IoT devices they make are, meaning

the devices provide functionality that their customers need to secure them within their systems

and environments, and manufacturers can also help their customers by providing them with the

91 cybersecurity-related information they need. This publication describes voluntary, recommended

92 activities related to cybersecurity that manufacturers should consider performing before their IoT

93 devices are sold to customers. These activities can help manufacturers lessen the cybersecurity-

94 related efforts needed by IoT device customers, which in turn can reduce the prevalence and 95 severity of IoT device compromises and the attacks performed using compromised IoT devices.

96

## 97

## Keywords

98 cybersecurity baseline; cybersecurity risk; Internet of Things (IoT); manufacturing; risk

99 management; risk mitigation; securable computing devices; software development

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100	Audience
108 109 110 111 112	The main audience for this publication is IoT device manufacturers. This publication may also help IoT device customers that use IoT devices and want to better understand what device cybersecurity capabilities they may offer and what cybersecurity information their manufacturers may provide.
112	Note to Reviewers
114 115 116 117 118 119	Reviewers of the first public comment draft of this publication will notice many changes to the structure of the publication. The main concepts within the publication remain the same; it is only their presentation that has been revised to clarify the concepts and address other comments from the public. NIST encourages reviewers of the first public comment draft to read this full draft and provide comments on any areas where additional clarity may be needed.
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### 154 **Executive Summary**

Manufacturers are creating an incredible variety and volume of internet-ready devices broadly 155 known as the Internet of Things (IoT). Most of these IoT devices do not fit the standard 156 157 definitions of information technology (IT) devices that have been used as the basis for defining 158 device cybersecurity capabilities (e.g., smartphones, servers, laptops). The IoT devices in scope 159 for this publication have at least one transducer (sensor or actuator) for interacting directly with 160 the physical world and at least one network interface (e.g., Ethernet, Wi-Fi, Bluetooth, Long-Term Evolution [LTE], Zigbee, Ultra-Wideband [UWB]) for interfacing with the digital world. 161 162 Many IoT devices provide computing functionality, data storage, and network connectivity for 163 equipment that previously lacked these functions. In turn, these functions enable new efficiencies 164 and technological capabilities for the equipment, such as remote access for monitoring,

- 165 configuration, and troubleshooting. IoT can also add the ability to analyze data about the
- 166 physical world and use the results to better inform decision making, alter the physical
- 167 environment, and anticipate future events. [1]
- 168 IoT devices are acquired and used by many customers: individuals, companies, government
- agencies, educational institutions, and other organizations. Unfortunately, IoT devices often lack
- 170 device capabilities customers can use to help mitigate their cybersecurity risks. Consequently,
- 171 IoT device customers may have to select, implement, and manage additional or new
- 172 cybersecurity controls or alter the controls they already have. Compounding this, customers may
- 173 not know they need to alter their existing processes to accommodate IoT. The result is many IoT
- devices are not secured in the face of evolving threats; therefore, attackers can more easily
- 175 compromise IoT devices and use them to harm device customers and conduct additional
- 176 nefarious acts (e.g., distributed denial of service [DDoS] attacks) against other organizations.<sup>1</sup>
- 177 Manufacturers can help their customers address the challenges of IoT cybersecurity by
- 178 improving how securable the IoT devices they make are, meaning the devices provide
- 179 capabilities that device customers—both organizations and individuals—need to secure them
- 180 within their systems and environments, and manufacturers provide their customers with the
- 181 cybersecurity-related information they need.
- 182 This document describes six voluntary, but recommended activities related to cybersecurity that
- 183 manufacturers should consider performing before their IoT devices are sold to customers. Four
- 184 of the six activities primarily impact decisions and actions performed by the manufacturer before
- a device is sent out for sale (pre-market), and the remaining two activities primarily impact
- 186 decisions and actions performed by the manufacturer after device sale (post-market). Performing
- 187 all six activities can help manufacturers provide IoT devices that better support the
- 188 cybersecurity-related efforts needed by IoT device customers, which in turn can reduce the

In 2017, Executive Order 13800, Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure [2], was issued to improve the Nation's cyber posture and capabilities in the face of intensifying threats. The Executive Order tasked the Department of Commerce and Department of Homeland Security with creating the Enhancing Resilience Against Botnets Report [3] to determine how to stop attacker use of botnets to perform DDoS attacks. This report contained many action items, and this document fulfills two of them: to create a baseline of cybersecurity capabilities for IoT devices, and to publish cybersecurity practices for IoT device manufacturers.

- 189 prevalence and severity of IoT device compromises and the attacks performed using
- 190 compromised IoT devices.
- 191 Activities with Primarily Pre-Market Impact
- Activity 1: Identify expected customers and define expected use cases. Identifying the expected customers and use cases for an IoT device early in its design is vital for determining which device cybersecurity capabilities the device should implement and how it should implement them.
- Activity 2: Research customer cybersecurity goals. Manufacturers cannot completely understand all of their customers' risk because every customer faces unique risks based on many factors. However, manufacturers can make their devices at least minimally securable by those they expect to be customers of their product who use them consistent with the expected use cases.
- Activity 3: Determine how to address customer goals. Manufacturers can determine how to address those goals by having their IoT devices provide particular device cybersecurity capabilities in order to help customers mitigate their cybersecurity risks. To provide manufacturers a starting point to use in identifying the necessary device cybersecurity capabilities, this document defines a core device cybersecurity capability baseline, which is a set of device cybersecurity capabilities that customers are likely to need:
- 208 o Device Identification: The IoT device can be uniquely identified logically and physically.
- 210 **Device Configuration**: The configuration of the IoT device's software and firmware 211 can be changed, and such changes can be performed by authorized entities only.
- Data Protection: The IoT device can protect the data it stores and transmits from unauthorized access and modification.
- Logical Access to Interfaces: The IoT device can restrict logical access to its local
   and network interfaces, and the protocols and services used by those interfaces, to
   authorized entities only.
- Software and Firmware Update: The IoT device's software and firmware can be
   updated by authorized entities only using a secure and configurable mechanism.
- Cybersecurity State Awareness: The IoT device can report on its cybersecurity state
   and make that information accessible to authorized entities only.
- Activity 4: Plan for adequate support of customer goals. Manufacturers can help make their IoT devices more securable by appropriately provisioning device hardware, firmware, software, and business resources to support the desired device cybersecurity capabilities.
- 225 Activities with Primarily Post-Market Impact
- Activity 5: Define approaches for communicating to customers. Many customers will
   benefit from manufacturers communicating to them—or others acting on the customers'

228 behalf, such as an internet service provider or a managed security services provider— 229 more clearly about cybersecurity risks involving the IoT devices the manufacturers are 230 currently selling or have already sold. 231 Activity 6: Decide what to communicate to customers and how to communicate it. • 232 There are many potential considerations for what information a manufacturer 233 communicates to customers for a particular IoT product and how that information will be 234 communicated. Examples of topics are: 235 • Cybersecurity risk-related assumptions that the manufacturer made when designing 236 and developing the device 237 Support and lifespan expectations 0 238 • Device cybersecurity capabilities that the device provides, as well as cybersecurity 239 functions that can be provided by a related device or a manufacturer service or system 240 • Device composition and capabilities, such as information about the device's software, 241 firmware, hardware, services, functions, and data types 242 Software and firmware updates 0 243 • Device retirement options 244

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#### 1 Introduction 273

#### 274 1.1 **Purpose and Scope**

275 The purpose of this publication is to give manufacturers voluntary recommendations for 276 improving how securable the IoT devices they make are. This means the IoT devices offer 277 device cybersecurity capabilities—cybersecurity features or functions the devices provide 278 through their own technical means (i.e., device hardware, firmware, and software)-that device 279 customers, both organizations and individuals, need to secure them within their systems and 280 environments. From this publication, IoT device manufacturers will learn how they can help IoT 281 device customers with cybersecurity risk management by carefully considering which device 282 cybersecurity capabilities to design into their devices for customers to use in managing their

- 283 cybersecurity risk.
- 284 The publication is intended to address a wide range of IoT devices. The IoT devices in scope for
- 285 this publication have at least one transducer (sensor or actuator) for interacting directly with the
- 286 physical world and at least one network interface (e.g., Ethernet, Wi-Fi, Bluetooth, Long-Term
- 287 Evolution [LTE], Zigbee, Ultra-Wideband [UWB]) for interfacing with the digital world. The
- 288 IoT devices in scope for this publication can function on their own and are not only able to
- 289 function when acting as a component of another device, such as a processor. Some IoT devices
- 290 may be dependent on specific other devices (e.g., a hub) or systems (e.g., a cloud) for some 291
- functionality. Also, no IoT device operates in isolation. Rather, IoT devices will be used in 292
- systems and environments with many other devices and components, some of which may be IoT 293 devices, while others may be conventional IT equipment. All parts of the IoT ecosystem other
- 294 than the IoT devices themselves are outside the scope of this publication.
- 295 This document is intended to inform the manufacturing of new devices and not devices that are
- already in production, although some of the information in this publication might also be 296
- 297 applicable to such devices.
- 298 Readers do not need a technical understanding of IoT device composition and capabilities, but a 299 basic understanding of cybersecurity principles is assumed.
- 300 1.2 Publication Structure
- 301 The remainder of this publication is organized into the following sections and appendices:
- 302 Section 2 provides background on how manufacturers can affect how securable their IoT 303 devices are for their customers, such as which cybersecurity risk mitigation areas 304 customers commonly need to address.
- 305 Sections 3 and 4 describe activities manufacturers should consider performing before • 306 their IoT devices are sold to customers in order to improve how securable the IoT devices 307 are for the customers.
- 308 • Section 3 includes activities that primarily impact other activities performed by the manufacturer before device sale. The Section 3 activities are: identifying 309 310 expected customers and defining expected use cases, researching customer

311 312		cybersecurity goals, determining how to address customer goals, and planning for adequate support of customer goals.
313 314 315 316 317	0	Section 4 includes activities that primarily impact other activities performed by the manufacturer after device sale. The Section 4 activities are: defining approaches for communicating with customers regarding IoT device cybersecurity, and deciding what to communicate to customers and how to communicate it.
318 319		on 5 provides a conclusion for the publication that explores next steps for facturers or other stakeholders in the IoT ecosystem.
320	• The R	eferences section lists the references for the publication.
321	• Apper	ndix A provides an acronym and abbreviation list.

• Appendix B contains a glossary of selected terms used in the publication.

### 323 **2** Background

324 From a manufacturer's perspective, the *pre-market* phase of an IoT device's life encompasses what the manufacturer does *before* the device is marketed and sold to a customer. Any actions 325 326 the manufacturer takes for an IoT device after it is sold, such as addressing vulnerabilities, delivering updated or new device capabilities, or providing cybersecurity information to 327 customers, are considered part of the *post-market* phase. Manufacturers are generally best able to 328 329 identify and incorporate plans for the device cybersecurity capabilities their devices will support early in the pre-market phase. Later in the pre-market phase, making design or implementation 330 331 changes is usually more complicated and costly, and might necessitate delaying the release of the 332 device. Once a device is on the market, many cybersecurity changes may no longer be viable, 333 especially if they necessitate changes to hardware, and those that can still be accomplished may

- be much more costly and difficult than if they had been done pre-market.
- 335 Sections 3 and 4 of this document describe cybersecurity activities and related planning that
- 336 manufacturers should consider performing during the pre-market phase for an IoT device.
- 337 Section 3 covers activities that primarily impact other pre-market activities, while Section 4
- discusses activities that primarily impact post-market activities. The activities in Sections 3 and 4
- focus on key cybersecurity activities and only represent a subset of what manufacturers may
- 340 need to do during their product development process and are not intended to be comprehensive.
- 341 For example, manufacturers will also find it easier to design and produce securable IoT devices
- 342 if they ensure their workforce has the necessary skills to perform the activities in Sections 3 and
- 343 4 before starting to perform them.



Figure 1: Activities Discussed in this Document Grouped by Phase Impacted

346 Figure 1 shows the activities covered in this document, arranged by the phase in which the

- outcomes of the activities will be used to increase device securability. As indicated in the figure,
- activities highlighted for each phase build on each other within that phase such that each pre-
- 349 market activity will build on the outcomes of prior activities. While highlighted activities 350 impacting the post-market phase may use artifacts and outcomes from pre-market activities, they
- may also draw on other sources of guidance and information. The moment at which a device is
- 351 may also draw on other sources of gardance and information. The moment at which a device is 352 considered to have "gone to market" will vary by product, manufacturer, and circumstance, but
- is defined as when a manufactured device is no longer under the control of the manufacturer (i.e.,
- 354 when it has been released to an intermediary, such as a retailer, or an end-customer). Activities
- 355 primarily impacting the post-market phase, though intended to help the securability of IoT
- devices after or as they are sold (e.g., by helping inform customers how a device can help meet
- their cybersecurity goals), should be planned to start in the pre-market phase.

358 Improving how securable an IoT device is for customers means helping customers meet their risk

- 359 mitigation goals, which involves addressing a set of risk mitigation areas. Even customers
- 360 without formal risk mitigation goals, such as home consumers, often have informal and indirect
- 361 goals, like having their IoT device provide the desired functionality as expected, that are
- dependent to some extent on addressing risk mitigation areas. Based on an analysis of existing
- NIST publications such as the Cybersecurity Framework [6] and SP 800-53 [5] and the characteristics of IoT devices, NIST IR 8228, *Considerations for Managing Internet of Things*
- 365 (*IoT*) Cybersecurity and Privacy Risks [4] identified the common risk mitigation areas for IoT
   366 devices as:
- Asset Management: Maintain a current, accurate inventory of all IoT devices and their relevant characteristics throughout the devices' lifecycles in order to use that information for cybersecurity risk management purposes. Being able to distinguish each IoT device from all others is needed for the other common risk mitigation areas—vulnerability management, access management, data protection, and incident detection.
- 372 Vulnerability Management: Identify and eliminate known vulnerabilities in IoT device software and firmware throughout the devices' lifecycles in order to reduce the likelihood 373 374 and ease of exploitation and compromise. Vulnerabilities can be eliminated by installing 375 updates (e.g., patches) and changing configuration settings. Updates can also correct IoT device operational problems, which can improve device availability, reliability, 376 performance, and other aspects of device operation. Customers often want to alter a 377 378 device's configuration settings for a variety of reasons, including cybersecurity, 379 interoperability, privacy, and usability.
- Access Management: Prevent unauthorized and improper physical and logical access to, usage of, and administration of IoT devices throughout the devices' lifecycles by people, processes, and other computing devices. Limiting access to interfaces reduces the attack surface of the device, giving attackers fewer opportunities to compromise it.
- Data Protection: Prevent access to and tampering with data at rest or in transit that
   might expose sensitive information or allow manipulation or disruption of IoT device
   operations throughout the devices' lifecycles.
- Incident Detection: Monitor and analyze IoT device activity for signs of incidents
   involving device and data security throughout the devices' lifecycles. These signs can

also be useful in investigating compromises and troubleshooting certain operationalproblems.

391 Manufacturers of IoT devices addressing these areas by incorporating corresponding device

392 cybersecurity capabilities into their IoT devices will help reduce customer challenges in securing

those devices by aligning IoT device capabilities better with customer expectations. Many of

- these areas can only be addressed effectively, and most are addressed more efficiently, by device
- 395 cybersecurity capabilities being built into devices instead of customers providing them through
- 396 their environments.

Sections 3 and 4 of NIST IR 8228 [4] discuss additional cybersecurity-related considerations that
 manufacturers should be mindful of when identifying the device cybersecurity capabilities IoT
 devices provide. Also, Tables 1 and 2 in Section 4 of NIST IR 8228 list common shortcomings
 in IoT device cybersecurity, explain how they can negatively impact customers, and provide the

401 rationales for needing each capability and key element in the core baseline in this document.

For many IoT devices, additional types of risks, such as privacy,<sup>2</sup> safety, reliability, or resiliency, 402 403 need to be managed simultaneously with cybersecurity risks because of the effects addressing 404 one type of risk can have on others. A common example is ensuring that when a device fails, it 405 does so in a safe manner. Only cybersecurity risks are discussed in this publication. Readers who 406 are interested in better understanding other types of risks and their relationship to cybersecurity 407 may benefit from reading NIST SP 800-82 Revision 2, Guide to Industrial Control Systems 408 (ICS) Security [7] and NIST SP 1500-201, Framework for Cyber-Physical Systems: Volume 1, 409 Overview, Version 1.0 from the Cyber-Physical Systems Public Working Group [8].

A number of privacy efforts, including the NIST Privacy Framework (<u>https://www.nist.gov/privacy-framework</u>), are currently underway that are likely to inform needed IoT device capabilities to support privacy. While the core baseline includes device cybersecurity capabilities that also support privacy, such as protecting the confidentiality of data, it does not include non-cybersecurity related device capabilities that support privacy.

### 411 **3** Manufacturer Activities Impacting the IoT Device Pre-Market Phase

412 Manufacturers should consider performing the activities described in this section in order to improve how securable the IoT device is for customers (e.g., increase the number or efficacy of 413 414 customer-expected device cybersecurity capabilities offered on IoT devices). The activities are 415 meant to be conducted in parallel with or as extensions of a manufacturer's other pre-market activities, and they will primarily impact those other pre-market activities. Some of these 416 417 activities can have broader purposes than cybersecurity (e.g., exploring expected customers and 418 use cases); effort should not be duplicated, and artifacts from all pre-market activities can inform 419 cybersecurity-specific actions. The more integrated these suggested activities are with other pre-420 market activities, the better cybersecurity is likely to be planned for and implemented in IoT

421 devices.

### 422 **3.1** Activity 1: Identify Expected Customers and Define Expected Use Cases

423 Identifying the expected customers for an IoT device early in its design is vital for determining

424 which device cybersecurity capabilities the device should implement and how it should

425 implement them. For example, a large company might need a device to integrate with its log

426 management servers, but a typical home customer would not. Manufacturers can answer

427 questions like the following:

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Another early step in IoT device design is defining expected use cases for the device based on
the expected customers. To help define a use case, manufacturers can answer the following
questions, based on how they anticipate the device will be reasonably deployed and used:

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  2. Where geographically will the device be used? (e.g., countries, jurisdictions within countries)
- What physical environments will the device be used in? (e.g., inside or outside;
  stationary or moving; public or private; movable or immovable)
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  4. What dependencies on other systems will the device likely have? (e.g., requires use of a particular IoT hub; uses cloud-based third-party services for some functionality)
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  5. How might attackers misuse and compromise the device within the context of the use case? (i.e., potential pairings of threats and vulnerabilities, such as in a threat model)
- 447 6. What other aspects of device use might be relevant to the device's cybersecurity
  448 risk?

## 449 **3.2** Activity 2: Research Customer Cybersecurity Goals

450 Manufacturers cannot completely understand all of their customers' risk because every customer, 451 system, and IoT device faces unique risks based on many factors. However, manufacturers can consider the expected use cases for their IoT devices, then make their devices at least minimally 452 453 securable by customers who acquire and use them consistent with those use cases. *Minimally* 454 securable means the devices have the device cybersecurity capabilities customers may need to 455 mitigate some common cybersecurity risks. Customers also have a role in securing their IoT 456 devices and the systems that incorporate those devices, including using additional technical, 457 physical, and procedural means. The degree to which a customer may have a role will vary, but 458 for most customers and use cases, device cybersecurity capabilities built into IoT devices 459 generally make risk mitigation easier and more effective for customers.

460 Customers will use *means* to achieve their goals. *Means* is defined as "an agent, tool, device,
461 measure, plan, or policy for accomplishing or furthering a purpose." [9] This publication refers
462 to technical or non-technical means for cybersecurity purposes, whether performed by an IoT
463 device itself or elsewhere. The term introduced in Section 1, *device cybersecurity capabilities*,
464 refers to technical means being performed by an IoT device itself.

465 As Figure 2 demonstrates, the connections between manufacturers and customers around

466 cybersecurity are important to keep in mind. Customers who buy and use IoT devices are

467 intending to connect those devices to systems and networks, including the internet. As customers

468 adopt these devices, they will seek to secure them in order to meet their goals. IoT devices that

support the device cybersecurity capabilities customers need or expect will be easier for

470 customers to secure, particularly using mechanisms customers have already implemented.

471 Manufacturers can anticipate many customer cybersecurity goals, especially those based on

472 existing cybersecurity guidance and requirements—for example, customers in a particular sector

473 may be required by regulations to change all default passwords.



Figure 2: Connections Between IoT Device Manufacturers and Customers Around Cybersecurity

- 476 Cybersecurity risks for IoT devices can be thought of in terms of two high-level risk mitigation
- 477 goals. The first is safeguarding the confidentiality, integrity, and availability of the device
- itself—to prevent the device from being misused to negatively impact the customer or to attack
- other organizations, or from not providing the expected functionality for the customer. The
   second is safeguarding the confidentiality, integrity, and/or availability of data (including
- 480 second is safeguarding the confidentiality, integrity, and/or availability of data (including 481 personally identifiable information [PII]) collected by, stored on, processed by, or transmitted to
- 481 personally identifiable information [P11]) confected by, stored on, processed by, or transmitted 482 or from the IoT device
- 482 or from the IoT device.
- To gather information on customer goals related to safeguarding device integrity and data
  confidentiality, integrity, and availability, manufacturers can answer the following questions for
  each of the expected use cases:
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  1. How will the IoT device interact with the physical world? The potential impact of
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  480, operational requirements for performance, reliability, resilience, and safety may be
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- 493 • The methods likely to be used by device customers to manage the device are 494 important to consider. An IoT device could support integration with common 495 enterprise systems (e.g., asset management, vulnerability management, log 496 management) to give customers with these systems greater control and visibility into 497 the devices' cybersecurity risk. For an IoT device expected to be used in home 498 environments only, this capability would not be relevant; customers would expect a user-friendly way to manage their devices, or even want the manufacturer to perform 499 500 all device management on their behalf (e.g., install patches automatically). An IoT 501 device used by a small business might also be managed by a third party on behalf of 502 the business.
- 503 Making a device highly configurable is generally more desirable in organization ٠ 504 environments and less so in home customer settings. A home customer is less likely 505 to understand the significance of granular cybersecurity configuration settings and 506 thus misconfigure a device, weakening its security and increasing the likelihood of a compromise. Some home customers are also unlikely to want to change configuration 507 508 settings after initial device deployment. However, some configuration settings, such 509 as enabling or disabling clock synchronization services for the device and choosing a 510 time server to use for clock synchronization, may be desired by many customers, 511 including industrial, enterprise, and home customers. Device configuration might be 512 entirely omitted in cases where the device does not need to be provisioned or 513 customized in any way during or after deployment (e.g., does not need to be joined to 514 a wireless network, does not need to be associated with a particular user).
- Consider how accessible the device is, either logically or physically. Imagine an IoT
   food vending machine in a public place, which is internet connected so suppliers can
   track inventory and machine status. Vending machine users would not be required to

518authenticate themselves in order to insert money and purchase a snack. However, the519vending machine would also be highly susceptible to physical attack.

- 520 Consider allowing device cybersecurity capabilities that may negatively impact 521 operations to be disabled. An example is capabilities intended to deter brute force 522 attacks against passwords, such as locking out an account after too many failed 523 authentication attempts, because these can inadvertently cause a denial of service for 524 the person or device attempting to authenticate. In safety-critical environments, such 525 disruptions to access may not be acceptable because of the danger they would cause. Customers often need flexibility in configuring such features or disabling them 526 527 altogether.
- 528 3. How will the IoT device's use of device cybersecurity capabilities be affected in 529 terms of the device's availability, efficiency, and effectiveness? Here is an example. Devices expected to be used on low bandwidth or unreliable networks might not be able 530 to use certain device capabilities. Depending on such a network for downloading large 531 532 updates might saturate the network connection, disrupting other usage, and take too long 533 to get updates to the device. Manufacturers could consider alternative update strategies, 534 such as changing their processes to reduce update sizes, or distributing updates to 535 administrators on high-speed network connections and having the administrators 536 manually transfer the updates to the IoT device (which introduces additional cybersecurity risks from malware being transmitted by removable media that may need to 537 538 be mitigated).
- 4. What will the nature of the IoT device's data be? There is a great deal of variability in data across IoT devices; some devices do not store any data, while others store data that could cause significant harm if accessed or modified by unauthorized entities.
  Understanding the nature of data on a device in the context of the customers and use cases can help manufacturers identify which device cybersecurity capabilities may be needed for protecting device data, such as data encryption, device and user authentication, access control, and backup/restore.
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  5. What are the known cybersecurity requirements for the IoT device? Manufacturers
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- 550 6. What complexities will be introduced by the IoT device interacting with other devices, systems, and environments? For example, complexity can be driven by new 551 552 uses of IoT and IoT devices, new combinations of those devices with each other and 553 conventional IT devices, and increasing interconnections among devices and systems. These complexities could mean new functionality, which may have human-safety or 554 555 privacy implications, will be connected via networking technologies to systems that do 556 not appropriately mitigate these risks. An IoT device that can stream images from inside the home, such as a smart baby monitor, or that can alter the environment to the point of 557 558 danger, such as a smart oven, might require safeguards not usually considered for 559 conventional IT devices. IoT can also introduce complexities related to scale, which 560 could make ongoing management and support of devices difficult.

## 561 **3.3** Activity 3: Determine How to Address Customer Goals

After researching the cybersecurity goals for the IoT device's expected customers and use cases, manufacturers can determine how to address those goals in order to help customers mitigate cybersecurity risks. For each cybersecurity goal, the manufacturer can answer this question: which one or more of the following is a suitable means (or combination of means) to achieve the goal?

- The IoT device can provide the technical means through its device cybersecurity
   capabilities (for example, by using device cybersecurity capabilities built into the
   device's operating system, or by having the device's application software provide device
   cybersecurity capabilities).
- Another device related to the IoT device (e.g., an IoT gateway or hub also from the manufacturer, a third-party IoT gateway or hub) can provide the technical means on behalf of the IoT device (e.g., acting as an intermediary between the IoT device and other networks while providing command and control functionality for the IoT device).
- Other systems and services acting on behalf of the manufacturer can provide the technical 576 means (e.g., a cloud-based service that securely stores data for each IoT device).
- The customer can select and implement other technical and non-technical means for
   mitigating cybersecurity risk. (The customer can also choose to respond to cybersecurity
   risk in other ways, including accepting or transferring it.) For example, an IoT device
   may be intended for use in a customer facility with stringent physical security controls in
   place.
- 582 Note that there is not necessarily a one-to-one correspondence between goals and technical 583 means; for example, it may take multiple technical means to achieve a goal, and a single 584 technical means may help address multiple goals.
- 585 In addition to identifying suitable means for addressing each cybersecurity goal, manufacturers 586 can also answer this question: how robustly must each technical means be implemented in 587 order to achieve the cybersecurity goal? Here are some examples of potential robustness 588 considerations:
- Whether it needs to be implemented in hardware or can be implemented in software
   instead
- Which data needs to be protected, what types of protection each instance of data needs
   (e.g., confidentiality, integrity), and how strong that protection needs to be
- How strongly an entity's identity needs to be authenticated before granting access (e.g.,
   PIN, password, passphrase, two-factor authentication)
- How readily software and firmware updates can be reverted if a problem occurs (e.g., a rollback capability, an anti-rollback capability)

597 Ultimately, manufacturers can aggregate the technical means identified for all the goals to
598 answer the following question: which technical means will be provided by the IoT device
599 itself, other devices related to the IoT device, other systems and services acting on behalf of

600 the manufacturer, and the customer, and how robust should each of those means be? The

rest of this publication focuses on the first part of the question: which technical means will be

602 provided by the IoT device itself—in other words, device cybersecurity capabilities?

Identifying the device cybersecurity capabilities that the device itself needs to provide should 603 604 happen as early as feasible in device design processes so the capabilities can be taken into 605 account when selecting or designing IoT device hardware, firmware, and software. To provide 606 manufacturers a starting point to use in identifying the necessary device cybersecurity capabilities for their IoT devices, Table 1 defines a core device cybersecurity capability baseline 607 608 (*core baseline*),<sup>3</sup> which is a set of device capabilities generally needed to support common 609 cybersecurity controls that protect the customer's devices and device data, systems, and ecosystems. The core baseline has been derived from common cybersecurity risk management 610 approaches. The risk mitigation areas that are supported by each device capability in Table 1 are 611 612 shown in Figure 2 after the table to indicate how these capabilities are intended to support

613 common cybersecurity controls.

614 The core baseline's role is as a default for minimally securable devices, meaning that device

615 cybersecurity capabilities will often need to be added or removed from an IoT device's design to

take into account the manufacturer's understanding of customers' likely cybersecurity risks. The

617 core baseline does not specify how the device cybersecurity capabilities are to be achieved, so

618 manufacturers who choose to adopt the core baseline for any of the IoT devices they produce

619 have considerable flexibility in implementing it to effectively address customer needs.

- 620 Each row in Table 1 covers one of the device cybersecurity capabilities in the core baseline:
- The first column defines the capability. Note that Figure 3, which is located immediately after Table 1, indicates how the capability relates to the risk mitigation areas and challenges defined in NIST IR 8228, *Considerations for Managing Internet of Things* (*IoT*) *Cybersecurity and Privacy Risks* [4].
- The second column provides a numbered list of *key elements* of that capability—elements an IoT device manufacturer seeking to implement the core baseline often (but not always) would use in order to achieve the capability. (Note: the elements are not intended to be comprehensive, nor are they in any particular order.)
- The last column lists IoT reference examples that indicate existing sources of IoT device cybersecurity guidance specifying a similar or related capability. Because the table only covers the basics of the capabilities, the references can be invaluable for understanding each capability in more detail and learning how to implement each capability in a reasonable manner. The following are the references used in Table 1:
- 634 o AGELIGHT: AgeLight Digital Trust Advisory Group, "IoT Safety Architecture &
   635 Risk Toolkit (IoTSA) v3.1" [10]

<sup>&</sup>lt;sup>3</sup> The usage of the term "baseline" in this document should not be confused with the low-, moderate-, and high-impact control baselines set forth in NIST Special Publication (SP) 800-53 [5] to help federal agencies meet their obligations under the Federal Information Security Modernization Act (FISMA) and other federal policies. In this document, "baseline" is used in the generic sense to refer to a set of foundational requirements or recommendations.

636 637	0	<b>BITAG</b> : Broadband Internet Technical Advisory Group (BITAG), "Internet of Things (IoT) Security and Privacy Recommendations" [11]
638 639	0	<b>CSA</b> : Cloud Security Alliance (CSA) IoT Working Group, "Identity and Access Management for the Internet of Things" [12]
640 641	0	<b>CSDE</b> : Council to Secure the Digital Economy (CSDE), "The C2 Consensus on IoT Device Security Baseline Capabilities" [13]
642 643	0	<b>CTIA</b> : CTIA, "CTIA Cybersecurity Certification Test Plan for IoT Devices, Version 1.0.1" [14]
644 645 646	0	<b>ENISA</b> : European Union Agency for Network and Information Security (ENISA), "Baseline Security Recommendations for IoT in the context of Critical Information Infrastructures" [15]
647 648	0	<b>ETSI</b> : European Telecommunications Standards Institute (ETSI), "Cyber Security for Consumer Internet of Things" [16]
649 650	0	<b>GSMA</b> : Groupe Spéciale Mobile Association (GSMA), "GSMA IoT Security Assessment" [17]
651 652 653	0	<b>IEC</b> : International Electrotechnical Commission (IEC), "IEC 62443-4-2, Edition 1.0, Security for industrial automation and control systems – Part 4-2: Technical security requirements for IACS components" [18]
654 655	0	<b>IIC</b> : Industrial Internet Consortium (IIC), "Industrial Internet of Things Volume G4: Security Framework" [19]
656 657	0	<b>IoTSF</b> : IoT Security Foundation (IoTSF), "IoT Security Compliance Framework, Release 2" [20]
658 659	0	<b>ISOC/OTA</b> : Internet Society/Online Trust Alliance (OTA), "IoT Security & Privacy Trust Framework v2.5" [21]
660 661	0	<b>PSA</b> : Platform Security Architecture (PSA) Joint Stakeholder Agreement (JSA) Members, "PSA Certified <sup>™</sup> Level I Questionnaire, Version 1.2" [22]

Device Cybersecurity Capability	Key Elements	IoT Reference Examples
<b>Device Identification</b> : The IoT device can be uniquely identified logically and physically.	<ol> <li>A unique logical identifier</li> <li>A unique <u>physical identifier</u> at an external or internal location on the device <u>authorized entities</u> can access</li> <li>Note: the physical and logical identifiers may represent the same value, but they do not have to.</li> </ol>	<ul> <li>CSA: 1</li> <li>CSDE: 5.1.1</li> <li>CTIA: 4.13</li> <li>ENISA: GP-PS-10</li> <li>GSMA: CLP13_6.6.2, 6.8.1, 6.20.1</li> <li>IEC: CR 1.2</li> <li>IIC: 7.3, 8.5, 11.7, 11.8</li> <li>IoTSF: 2.4.8.1, 2.4.14.3, 2.4.14.4</li> <li>PSA: R2.1</li> </ul>
<b>Device Configuration</b> : The <u>configuration</u> of the IoT device's <u>software</u> and <u>firmware</u> can be changed, and such changes can be performed by authorized entities only.	<ol> <li>The ability to change the device's software and firmware configuration settings</li> <li>The ability to restrict configuration changes to authorized entities only</li> <li>The ability for authorized entities to restore the device to a secure configuration defined by an authorized entity</li> </ol>	<ul> <li>BITAG: 7.1</li> <li>CSA: 22</li> <li>ENISA: GP-TM-06</li> <li>IEC: CR 7.4, CR 7.6</li> <li>IIC: 7.3, 7.6, 8.10, 11.5</li> <li>IoTSF: 2.4.8.17, 2.4.15</li> <li>ISOC/OTA: 26</li> </ul>
approval to intera baseline do not sp unauthorized entit authorization. Als authorized to inter	<i>tity</i> is an entity (defined below) that has in ct with a particular IoT device. The device becify how authorization is implemented f ties. It is left to the manufacturer to decid to, an entity authorized to interact with an ract with the same device in another way.	e cybersecurity capabilities in the core for distinguishing authorized and e how each device will implement IoT device in one way might not be

• *Configuration* is "the possible conditions, parameters, and specifications with which an information system or system component can be described or arranged." [23] The Device Configuration capability does not define which configuration settings should exist, simply that a mechanism to manage configuration settings exists.

- A *device identifier* is a context-unique value—a value unique within a specific context—that is associated with a device (for example, a string consisting of a network address). (This definition is derived from [24].)
- An *entity* is a person, device, service, network, domain, manufacturer, or other party who might interact with an IoT device.
  - *Firmware* is "software that is included in read-only memory (ROM)." [25]
- A *logical identifier* is a device identifier that is expressed logically by the device's software or firmware. An example is a media access control (MAC) address assigned to a network interface.
  - A *physical identifier* is a device identifier that is expressed physically by the device (e.g., printed onto a device's housing, displayed on a device's screen).
- *Software* is "computer programs and associated data that may be dynamically written or modified during execution." [5]

Device Cybersecurity Capability	Key Elements	IoT Reference Examples
Data Protection: The IoT device can protect the data it stores and transmits from unauthorized access and modification.	<ol> <li>The ability to use demonstrably secure cryptographic modules for standardized cryptographic algorithms (e.g., encryption with authentication, cryptographic hashes, digital signature validation) to prevent the confidentiality and integrity of the device's stored and transmitted data from being compromised</li> <li>The ability for authorized entities to render all data on the device inaccessible by all entities, whether previously authorized or not (e.g., through a wipe of internal storage, destruction of cryptographic keys for encrypted data)</li> <li>Configuration settings for use with the <b>Device Configuration</b> capability including, but not limited to, the ability for authorized entities to configure the cryptography use itself, such as choosing a key length</li> </ol>	<ul> <li>AGELIGHT: 5, 7, 18, 24, 25, 34</li> <li>BITAG: 7.2, 7.10</li> <li>CSDE: 5.1.3, 5.1.4, 5.1.5, 5.1.8, 5.1.10</li> <li>CTIA: 4.8, 5.14, 5.15</li> <li>ENISA: GP-OP-04, GP-TM-02, GP-TM-04, GP-TM-14, GP-TM-24, GP-TM-32, GP-TM-34, GP-TM-35, GP-TM-39, GP-TM-40</li> <li>ETSI: 4.4-1, 4.5-1, 4.5-2, 4.11-1, 4.11-2, 4.11-3</li> <li>GSMA: CLP13_6.4.1.1, 6.11, 6.12.1.1 6.19, 7.6.1, 8.10.1.1, 8.11.1</li> <li>IEC: CR 3.1, CR 3.4, CR 4.1, CR 4.2, CR 4.3</li> <li>IIC: 7.3, 7.4, 7.6, 7.7, 8.8, 8.11, 8.13, 9.1, 10.4, 11.9</li> <li>IoTSF: 2.4.6.5, 2.4.7, 2.4.8.8, 2.4.8.16 2.4.9, 2.4.12.2, 2.4.16.1, 2.4.16.2</li> <li>ISOC/OTA: 2, 17, 33</li> <li>PSA: C1.4, C2.4, D2.3, D2.4, D3.1, D4.5, D5.1, D5.2, R2.2, R2.3, R3.2, R3.3, R6.1</li> </ul>
Logical Access to Interfaces: The IoT device can restrict logical access to its <u>local</u> and <u>network interfaces</u> , and the protocols and services used by those interfaces, to authorized entities only.	<ol> <li>The ability to logically or physically disable any local and network interfaces that are not necessary for the core functionality of the device</li> <li>The ability to logically restrict access to each network interface (e.g., device authentication, user authentication)</li> <li>Configuration settings for use with the <b>Device Configuration</b> capability including, but not limited to, the ability to enable, disable, and adjust thresholds for any ability the device might have to lock or disable an account or to delay additional authentication attempts after too many failed authentication attempts</li> </ol>	<ul> <li>AGELIGHT: 10, 13, 14, 15, 16, 19</li> <li>BITAG: 7.1, 7.2, 7.3, 7.6</li> <li>CSA: 2, 4, 20</li> <li>CSDE: 5.1.2</li> <li>CTIA: 3.2, 3.3, 3.4, 4.2, 4.3, 4.9, 5.2</li> <li>ENISA: GP-TM-08, GP-TM-09, GP-TM-21, GP-TM-22, GP-TM-25, GP-TM-27, GP-TM-29, GP-TM-33, GP-TM-42, GP-TM-44, GP-TM-45</li> <li>ETSI: 4.1-1, 4.4-1, 4.6-1, 4.6-2</li> <li>GSMA: CLP13_6.9.1, 6.12.1, 6.20.1, 7.6.1, 8.2.1, 8.4.1</li> <li>IEC: CR 1.1, CR 1.2, CR 1.5, CR 1.7, CR 1.11, CR 2.1, CR 2.2, CR 2.13, CF 7.7, EDR 2.13</li> <li>IIC: 7.3, 7.4, 8.3, 8.6, 11.7</li> <li>IoTSF: 2.4.4.5, 2.4.4.9, 2.4.5.5, 2.4.6.3, 2.4.6.4, 2.4.7, 2.4.8</li> <li>ISOC/OTA: 3, 12, 13, 14, 15, 16</li> <li>PSA: C2.3, D2.1, D2.2, D3.3, D4.1, D4.2, D4.3, R3.1, R4.2, R5.1, R5.2</li> </ul>

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688 689	•	An <i>interface</i> is a boundary between the IoT device and entities where interactions take place. (This definition is derived from [26].) There are two types of interfaces: network and local.
690 691 692	•	<i>Local interfaces</i> are interfaces that can only be accessed physically, such as ports (e.g., USB, audio, video/display, serial, parallel, Thunderbolt) and removable media drives (e.g., CD/DVD drives, memory card slots).
693	•	Network interfaces are interfaces that connect the IoT device to networks.

Device Cybersecurity Capability	Key Elements	IoT Reference Examples
Software and Firmware Update: The IoT device's software and firmware can be <u>updated</u> by authorized entities only using a secure and configurable mechanism.	<ol> <li>The ability to update the device's software and firmware through remote (e.g., network download) and/or local means (e.g., removable media)</li> <li>The ability to confirm the validity of any update before installing it</li> <li>The ability for authorized entities to roll back updated software and firmware to a previous version</li> <li>The ability to restrict updating actions to authorized entities only</li> <li>The ability to enable or disable updating</li> <li>Configuration settings for use with the <b>Device Configuration</b> capability including, but not limited to:         <ul> <li>The ability to configure remote update mechanisms to be either automatically or manually initiated for update downloads and installations</li> <li>The ability to enable or disable notification when an update is available and specify who or what is to be notified</li> </ul> </li> </ol>	<ul> <li>AGELIGHT: 1, 2, 4</li> <li>BITAG: 7.1</li> <li>CSDE: 5.1.9</li> <li>CTIA: 3.5, 3.6, 4.5, 4.6, 5.5, 5.6</li> <li>ENISA: GP-TM-05, GP-TM-06, GP-TM-18, GP-TM-19</li> <li>ETSI: 4.3-1, 4.3-2, 4.3-7</li> <li>GSMA: 7.5.1</li> <li>IEC: CR 3.4, EDR 3.10</li> <li>IIC: 7.3, 11.5.1</li> <li>IoTSF: 2.4.5.1, 2.4.5.2, 2.4.5.3, 2.4.5.4, 2.4.5.8, 2.4.6.1</li> <li>ISOC/OTA: 1, 6, 8</li> <li>PSA: C2.1, C2.2, R1.1, R1.2</li> </ul>
Cybersecurity State Awareness: The IoT device can report on its <u>cybersecurity state</u> and make that information accessible to authorized entities only.	<ol> <li>The ability to report the device's cybersecurity state</li> <li>The ability to differentiate between when a device will likely operate as expected from when it may be in a <u>degraded cybersecurity state</u></li> <li>The ability to restrict access to the state indicator so only authorized entities can view it</li> <li>The ability to prevent any entities (authorized or unauthorized) from editing the state except for the device's monitor</li> <li>The ability to make the state information available to a service on another device, such as an event/state log server</li> </ol>	<ul> <li>CSDE: 5.1.7</li> <li>CTIA: 4.7, 4.12, 5.7, 5.16</li> <li>ENISA: GP-TM-55, GP-TM-56</li> <li>ETSI: 4.7-2, 4.10-1</li> <li>GSMA: CLP13_6.13.1, 7.2.1, 9.1.1.2</li> <li>IEC: CR 2.8, CR 3.9, CR 6.1, CR 6.2</li> <li>IIC: 7.3, 7.5, 7.7, 8.9, 10.3, 10.4</li> <li>IoTSF: 2.4.7.5</li> <li>PSA: D3.2, D3.4, R4.1, R4.3</li> </ul>

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696	•	A cybersecurity state is the condition of a device's cybersecurity expressed in a way that is
697		meaningful and useful to the device's customer. For example, a very simple device might express
698		its state in terms of whether or not it is operating as expected, while a complex device might
699		perform cybersecurity logging, check its integrity at boot, and examine and report additional
700		aspects of its cybersecurity state.
701	•	A degraded cybersecurity state is a cybersecurity state that indicates the device's cybersecurity
702		has been significantly negatively impacted, such as the device being unable to operate as
703		expected, or the integrity of the device's firmware being violated.
704	•	An <i>update</i> is a patch, upgrade, or other modification to code that corrects security and/or
705		functionality problems in software or firmware. (This definition is derived from [27].)

- 706 Manufacturers should keep in mind that the capabilities presented in Table 1 are meant as a
- starting point to help provide the means customers may need to apply common risk mitigations.
- Figure 3 below shows the risk mitigation area and challenges defined in NIST IR 8228,
- 709 Considerations for Managing Internet of Things (IoT) Cybersecurity and Privacy Risks [4] that
- would be supported, in part, by the core capabilities defined in Table 1.
- 711



- 712 713 Figure 3: NISTIR 8228 Risk Mitigation Areas Supported by Each Core Device Cybersecurity Capability
- 714

## 715 **3.4** Activity 4: Plan for Adequate Support of Customer Goals

- 716 It is important for manufacturers to consider how to support their customers' goals once they are
- 717 identified, including provisioning of computing resources to support device cybersecurity
- capabilities, as well as actions external to the device that may be required to continue to support
- 719 cybersecurity goals.
- 720 Manufacturers can help make their IoT devices more securable by appropriately provisioning
- device hardware resources (e.g., processing, memory, storage, network technology, power), as
- well as firmware and software resources, to support the desired device cybersecurity capabilities.
- For example, software-based encryption is processing-intensive, and a device with limited
- processing and no hardware-based encryption might not be able to provide what customers need.
- Another example is that some devices cannot support the use of an operating system or Internet
- Protocol (IP) networks, and one or both of those might be needed to support multiple device
- 727 cybersecurity capabilities.

When designing or selecting device hardware, firmware, and software resources, manufacturers
 can answer the following questions for the expected customers and use cases to help identify
 provisioning needs and potential issues:

- 1. What potential future use needs to be taken into account? For example, if a device has a 10-year lifespan, it may be necessary to update the encryption algorithm or key length the device uses during that time, and the new algorithm or key length may require more processing resources than the current algorithm or key length does.
- 735 2. Should an established IoT platform be used instead of acquiring and integrating 736 individual hardware, firmware, and software components? An IoT platform is a piece 737 of IoT device hardware with firmware and/or supporting software already installed and 738 configured for a manufacturer's use as the basis of a new IoT device. An IoT platform 739 might also offer third-party services or applications, or a software development kit (SDK) 740 to help expedite IoT application development. Manufacturers can choose a sufficiently 741 resourced and adequately secure IoT platform instead of designing hardware, installing 742 and configuring an operating system or firmware, creating new cloud-based services, writing IoT device applications and mobile apps from scratch, and performing other tasks 743 744 that are error-prone and generally more likely to introduce new vulnerabilities into the 745 IoT device compared to adopting an established platform.
- 3. Should any of the device cybersecurity capabilities be hardware-based? An example
  is having a hardware root of trust that provides trusted storage for cryptographic keys and
  enables performing secure boots and confirming device authenticity. Note that for some
  device cybersecurity capabilities, providing them in hardware could reduce agility for
  meeting future needs.
- 751 4. Does the hardware, firmware, or software (including the operating system) include 752 unneeded device capabilities with cybersecurity implications? If so, can they be 753 disabled to prevent misuse and exploitation? For example, a device may have local 754 interfaces on its external housing that are useful for some or future expected use cases, 755 but the device may be deployed in public areas by some expected customers, where those 756 interfaces would be exposed to possible attack. Possible approaches to this issue include 757 offering a tamper-resistant enclosure to prevent physical access to the interfaces, and 758 offering a configuration option that logically disables the interfaces.
- Manufacturers should consider which, if any, secure development practices are most appropriate
  for them and their customers as they further plan how to adequately support customer goals.
  Manufacturers can answer questions like the following based on expected customers and uses
  cases to help identify additional action to take towards cybersecurity:
- How is IoT device code protected from unauthorized access and tampering? (e.g.,
   well-secured code repository, version control features, code signing)
- 765
   2. How can customers verify software integrity for the IoT device? (e.g., code signature validation, cryptographic hash comparison)
- 3. What verification is done to confirm that the security of third-party software used
   within the IoT device meets the customers' needs? (e.g., check for known

769 vulnerabilities that are not yet fixed, review or analyze human-readable code, test 770 executable code) 771 4. What measures are taken to minimize the vulnerabilities in released IoT device 772 software? (e.g., follow secure coding practices, review and analyze human-readable 773 code, test executable code, configure software to have secure settings by default) 774 5. What measures are taken to accept reports of possible IoT device software 775 vulnerabilities and respond to them? (e.g., vulnerability response program, 776 vulnerability database monitoring, threat intelligence service use) 777 6. What processes are in place to assess and prioritize the remediation of all 778 vulnerabilities in IoT device software? (e.g., estimate remediation effort, estimate 779 potential impact of exploitation, estimate attacker resources needed to weaponize the 780 vulnerability) 781

781 IoT device manufacturers interested in more information on secure software development 782 practices can consult the NIST white paper *Mitigating the Risk of Software Vulnerabilities by* 

783 Adopting a Secure Software Development Framework (SSDF) [28], which highlights selected

784 practices for secure software development. Each of these practices is widely recommended by

existing secure software development publications, and the white paper provides references from

nearly 20 of these publications.

### 4 Manufacturer Activities Impacting the IoT Device Post-Market Phase

788 Manufacturers of IoT devices will at some point market and sell their product, which will put it in the hands of customers and initiate the manufacturing post-market phase. While customers are 789 790 evaluating potential product acquisitions, and after those products are sold to customers,

- 791 manufacturers continue to have a role in supporting the customers' cybersecurity goals and the
- 792 IoT devices, such as responding to vulnerability reports, and producing and disseminating
- 793 updates. These activities can benefit customers and their ability to secure devices throughout
- 794 their life, particularly as they assess and acquire IoT devices available on the market.
- 795 Though this section aims to help securability by making it easier for customers to understand and
- 796 identify how IoT devices are built to meet their cybersecurity expectations, which will primarily
- 797 impact post-market activities, planning for these activities (e.g., answering the presented
- 798 questions for each activity) is best performed before an IoT is marketed and sold to customers.
- 799 This planning should occur when information needed becomes available through various pre-
- market activities, such as those discussed in Section 3. Though Activities 1 through 4 may help 800
- inform planning and execution of the activities presented in this section, they are not considered 801
- 802 a prerequisite. This allows some or all aspects of the planning for Activities 5 and 6 to happen in
- 803 parallel with other pre-market activities.
- 804 An often-overlooked aspect of both marketing and the post-market phase is communication
- 805 related to cybersecurity. Many customers will benefit from manufacturers communicating to
- 806 them-or others acting on the customers' behalf-more clearly about cybersecurity risks
- 807 involving the IoT devices the manufacturers are currently selling or have already sold. This
- 808 section describes two broad activities related to customer communications that manufacturers
- 809 should consider performing to improve how securable their IoT devices are for customers after 810
- they are sold. The considerations mentioned within these activities may not apply to all
- 811 customers or manufacturers, but others may find the same considerations to be vital. Even if adopted, the outcomes of these activities will take different forms as many methods can be used 812
- 813 to achieve the describe outcomes, and different methods may be needed for different kinds of
- 814 customers.

#### 815 Activity 5: Define Approaches for Communicating to Customers 4.1

- 816 Clearly communicating cybersecurity information may necessitate different communication
- 817 approaches for different kinds of customers based on their expectations and resources.
- 818 Manufacturers can answer questions like the following to help define communication
- 819 approaches:
- 820 1. What terminology will the customer understand? For example, a home user will likely 821 have less technical knowledge than points of contact at a large business (e.g., system 822 administrators). Also, IT and cybersecurity professionals may already be familiar with conventions like referring to a vulnerability by its Common Vulnerabilities and 823 Exposures (CVE) number. 824
- 825 2. How much information will the customer need? Giving a customer too much 826 information may overwhelm them and make it harder for them to find the information 827 they need. Not providing enough information is generally undesirable, except for cases

- where revealing the information might have broader negative implications—for example,
  publishing technical details of a newly discovered vulnerability before an update is
  available to correct the vulnerability.
- 831
  3. How/where will the information be provided? Information can be provided in one or more logical and/or physical locations. Examples include user manuals and other product documentation, websites, emails, and the IoT device itself and its associated applications (e.g., mobile apps). Customers will benefit more when they can readily locate information whenever needed.
- 4. How can the integrity of the information be verified? For some methods of providing
  information, such as emails, customers may want a way to determine if the information is
  legitimate (e.g., not a social engineering attempt).

## 839 **4.2** Activity 6: Decide What to Communicate to Customers and How to Communicate It

840 There are many potential considerations for what information a manufacturer communicates to

841 customers for a particular IoT product and how that information will be communicated. The rest

842 of this section contains examples of topics that manufacturers might want to include in their

843 communications and, for some examples, thoughts on how that information might be

844 communicated.

## 845 **4.2.1** Cybersecurity Risk-Related Assumptions

To understand how their risk might differ from the manufacturer's expectations, some customers
may benefit by knowing the cybersecurity-related assumptions the manufacturer made when
designing and developing the device, such as the following:

- 849
  1. Who were the expected customers? For example, some IoT devices are created with a specific sector or customer type in mind, which could impact not only which device
  851 cybersecurity capabilities are implemented, but also how those capabilities function,
  852 which may not be how all customers expect.
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  3. What types of environment would the device be used in? Customers may need to
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- 4. How would responsibilities be shared among the manufacturer, the customer, and
  others? For example, some customers may benefit from knowing if device cybersecurity
  capabilities and tasks such as software and firmware updates, device configuration, data
  protection and destruction, and device management may be performed by one party or
  multiple parties.

## 865 **4.2.2 Support and Lifespan Expectations**

Communicating device support and lifespan expectations helps customers plan their
cybersecurity risk mitigations throughout the device's support lifecycle, which may be shorter
than how long the customer wants to use the device. To determine what information to
communicate to customers, manufacturers can answer questions like the following:

- How long do you intend to support the device? For example, telling customers how
   long updates and technical support will be available may help them plan to securely use
   and maintain devices for an appropriate amount of time.
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  2. When do you intend for device end-of-life to occur? For example, customers may want to plan to retire a device when the manufacturer considers the device at end-of-life.
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4. How can customers report suspected problems with cybersecurity implications, such as software vulnerabilities, to the manufacturer? Will reports be accepted after support ends? Will reports be accepted after end-of-life? Examples of reporting methods include phone numbers, email addresses, and web forms.

882 4.2.3 Technical and Non-Technical Means

Communicating information about the device cybersecurity capabilities the device provides
(technical means within the device), as well as the technical means that can be provided by a
related device or a manufacturer service or system, helps customers better understand how to
manage risk for the device. To determine what information about device cybersecurity
capabilities is important to communicate to customers, manufacturers can answer questions like
the following:

889 1. Which technical means can be provided 890 a. by the device itself (device cybersecurity capabilities)? Examples include 891 encryption used by the device for data protection, the presence of a physical identifier 892 on the device, and authentication and authorization mechanisms the device uses to limit access to its network interfaces. 893 894 b. by a related device? For example, some technical means may be delivered or 895 supported by an IoT hub or mobile device the IoT device is associated with. 896 c. by a manufacturer service or system? An example would be technical means 897 provided by an internet server or cloud-hosted service. 898 2. Which technical or non-technical means should the customer provide themselves or 899 consider providing themselves? An example is using network-based security controls to 900 prevent direct access to the device from the internet, such as a firewall. 901 3. How is each of the technical and non-technical means expected to affect 902 cybersecurity risk? For example, proper implementation of data protection may help mitigate confidentiality risks, but may also reduce availability (e.g., if data cannot be 903 decrypted or is decrypted slowly), which could worsen availability risks. 904

## 905 **4.2.4 Device Composition and Capabilities**

906 Communicating information about the device's software, firmware, hardware, services,
907 functions, and data types helps customers better understand and manage cybersecurity for their
908 devices, particularly if the customer is expected to play a substantial role in managing device
909 cybersecurity. To determine what information is important to communicate to customers,
910 manufacturers can answer questions like the following:

- What information do customers need on general cybersecurity-related aspects of the device, including device installation, configuration (including hardening), usage, management, maintenance, and disposal? Examples include how the device can securely join a system, what aspects of configuration may impact cybersecurity, and what ways of using the device are known to be insecure.
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   2. What is the potential effect on the device if the cybersecurity configuration is made more restrictive than the secure default? For example, some devices may lose some functionality as their cybersecurity configurations are made more stringent.
- 9193. What inventory-related information do customers need for the device's internal920software and firmware, such as versions, patch status, and known vulnerabilities?921Do customers need to be able to access the current inventory on demand? For922example, some customers may want to be aware of known vulnerabilities so they can923address them through other means, while other customers may want to know the current924software and firmware patch levels.
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  5. What information do customers need on the device's operational characteristics so
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- 6. What functions can the device perform? This includes not only device cybersecurity capabilities, but also any other functions that may have cybersecurity implications—for example, transmitting data to a remote system, or using a microphone and camera to capture audio and video.
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- 8. What are the identities of all parties (including the manufacturer) who have access to or any degree of control over the device? For example, a third party providing technical support on behalf of the manufacturer might be able to remotely update the device's software and configuration.

## 946 **4.2.5 Software and Firmware Updates**

- Manufacturers communicating information about updates helps customers plan their
  cybersecurity risk mitigations and maintain the cybersecurity of their devices, particularly in
  response to emerging threats. To determine what update information is important to
  communicate to customers, manufacturers can answer questions like the following:
- Will updates be made available? If so, when will they be released? For example,
   knowing if updates will be provided on a set schedule or sporadically will help customers
   plan for applying them.
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- 3. Which entity (e.g., customer, manufacturer, third party) is responsible for
  performing updates? Or can the customer designate which entity will be
  responsible? For example, some customers may benefit from knowing that firmware
  updates will be available from a third party and software updates will be provided by the
  manufacturer. Some customers may likewise benefit from being made aware of their
  roles, responsibilities, and options around updates.
- 4. How can customers verify and authenticate updates? Examples are cryptographic
   hash comparison, code signature validation, and reliance on manufacturer-provided
   software that automatically performs update verification and authentication.
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  5. What information should be communicated with each individual update? Examples are the nature of the update (e.g., corrections to errors, altered or new capabilities) and any effect installing the update could have on a customer's existing configuration settings.
- 970 **4.2.6 Device Retirement Options**
- Manufacturers communicating information about device retirement options helps customers plan
  for doing so securely. To determine what update information is important to communicate to
  customers, manufacturers can answer questions like the following:
- 9741. Will customers want to transfer ownership of their devices to another party? If so,975what do customers need to do so their user and configuration data on the device and976associated systems (e.g., cloud-based services used by the device) are not accessible977by the party who assumes ownership? For example, a customer may want to sell a978building that contains smart building automation devices, but would want a way to ensure979all data has been removed from the devices before the building buyer gains access to980them.
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  2. Will customers want to render their devices inoperable? If so, how can customers do that? For example, some IoT devices can be rendered inoperable through logical means (e.g., as executed through a mobile app), while others use physical means (e.g., a button on the device).
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### 986 5 Next Steps for Manufacturers

987 Sections 3 and 4 define six cybersecurity-related activities for IoT device manufacturers and give 988 examples of questions manufacturers can answer for each activity. Manufacturers who choose to 989 perform an activity should determine the applicability of the example questions and identify any 990 other questions that may help to understand customers' cybersecurity goals and the means the 991 customers expect, then answer the questions.

As Figure 4 conceptually depicts, IoT device manufacturers can use a variety of sources to gather

the information they need to answer the questions. In some instances, expected customers and

994 use cases will point to existing laws, regulations, or voluntary guidance for cybersecurity and 995 other aspects of device operation. For example, IoT devices intended to be used by the federal

996 government would be secured using security controls derived from guidance that is considered

by agencies for securing the systems that would include IoT devices (e.g., NIST SP 800-53 [5],

- 998 Cybersecurity Framework [6]). For some use cases, guidance may go beyond cybersecurity risks
- but will still have direct or indirect implications for cybersecurity, such as devices in the medical
- 1000 sector needing to comply with Food and Drug Administration (FDA) regulations and the Health
- 1001 Insurance Portability and Accountability Act (HIPAA). Many industrial sectors will also have
- 1002 consensus and/or voluntary guidance that is expected to be followed by their stakeholders.



1003

1004 Figure 4: Customer Cybersecurity Goals Informed and Reflected by Many Sources Manufacturers Can Use

- 1005 For some customers or sectors, such explicit written guidance may not be readily available or
- 1006 usable (e.g., due to high variability in goals for customers within a sector). For devices intended
- 1007 to be used by these customers, ascertaining their goals may require use of other forms of
- information, such as gathering information directly from customers or conducting secondaryresearch to gain a better understanding of their goals. With this information, manufacturers can
- 1010 follow a process of linking cybersecurity mitigation goals with specific device cybersecurity
- 1011 capabilities, as was used to make the core baseline, to determine the common device
- 1012 cybersecurity capabilities needed by many of their customers. Manufacturers can then implement
- 1013 these capabilities within their IoT devices to help as many customers achieve as many of their
- 1014 goals as is feasible. Other baselines building upon the core presented in this document can
- 1015 further help manufacturers identify device cybersecurity capabilities expected by customers.
- 1016 Figure 5 shows how additional baselines, as well as how specific, niche cybersecurity needs,
- 1017 such as those for a vertical within a sector, may adapt from and build upon each other.



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1019 Figure 5: How Additional Device Cybersecurity Capabilities Could Build Upon the Core Baseline

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<sup>&</sup>lt;sup>4</sup> ETSI is currently developing ETSI European Standard 303 645, which is similar to but not identical to the 103 645 Technical Specification cited here. The 303 645 version is not used in this publication because it is still a draft.

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## 1023 Appendix A—Acronyms and Abbreviations

1024 Selected acronyms and abbreviations used in this document are defined below.

BITAG	Broadband Internet Technical Advisory Group
CD	Compact Disc
CNSS	Committee on National Security Systems
CNSSI	Committee on National Security Systems Instruction
CSA	Cloud Security Alliance
CSDE	Council to Secure the Digital Economy
CVE	Common Vulnerabilities and Exposures
DDoS	Distributed Denial of Service
DVD	Digital Video Disc
ENISA	European Union Agency for Network and Information Security
ETSI	European Telecommunications Standards Institute
FISMA	Federal Information Security Modernization Act
FOIA	Freedom of Information Act
GSMA	Groupe Spéciale Mobile Association
IACS	Industrial Automation and Control Systems
ICS	Industrial Control System
IEC	International Electrotechnical Commission
IIC	Industrial Internet Consortium
IoT	Internet of Things
IoTSA	Internet of Things Safety Architecture & Risk Toolkit
IoTSF	Internet of Things Security Foundation
IP	Internet Protocol
IR	Internal Report
IT	Information Technology
ITL	Information Technology Laboratory
LTE	Long-Term Evolution
MAC	Media Access Control
NIST	National Institute of Standards and Technology
OTA	Online Trust Alliance
PII	Personally Identifiable Information
ROM	Read-Only Memory
SDK	Software Development Kit
SP	Special Publication
SSDF	Secure Software Development Framework
USB	Universal Serial Bus
UWB	Ultra-Wideband
Wi-Fi	Wireless Fidelity

# 1026 Appendix B—Glossary

1027 Selected terms used in this document are defined below.

Actuator	A portion of an IoT device capable of changing something in the physical world. [4]
Authorized Entity	An entity that has implicitly or explicitly been granted approval to interact with a particular IoT device.
Configuration	"The possible conditions, parameters, and specifications with which an information system or system component can be described or arranged." [23]
Core Baseline	A set of technical device capabilities needed to support common cybersecurity controls that protect the customer's devices and device data, systems, and ecosystems.
Core Device Cybersecurity Capability Baseline	See core baseline.
Cybersecurity State	The condition of a device's cybersecurity expressed in a way that is meaningful and useful to the device's customer.
Degraded Cybersecurity State	A cybersecurity state that indicates the device's cybersecurity has been significantly negatively impacted.
Device Cybersecurity Capability	A cybersecurity feature or function provided by an IoT device through its own technical means (i.e., device hardware, firmware, and software).
Device Identifier	A context-unique value—a value unique within a specific context— that is associated with a device (for example, a string consisting of a network address). (derived from [24])
Entity	A person, device, service, network, domain, manufacturer, or other party who might interact with an IoT device.
Firmware	"Software that is included in read-only memory (ROM)." [25]
Interface	A boundary between the IoT device and entities where interactions take place. (derived from [26])
IoT Platform	A piece of IoT device hardware with firmware and/or supporting software already installed and configured for a manufacturer's use as the basis of a new IoT device. An IoT platform might also offer third- party services or applications, or a software development kit to help expedite IoT application development.
Local Interface	An interface of an IoT device that can only be accessed physically, such as a port or a removable media drive.

Logical Identifier	A device identifier that is expressed logically by the device's software or firmware.
Means	"An agent, tool, device, measure, plan, or policy for accomplishing or furthering a purpose." [9]
Minimally Securable IoT Device	An IoT device that has the device cybersecurity capabilities (i.e., hardware, firmware, and software) customers may need to implement cybersecurity controls used to mitigate some common cybersecurity risks.
Network Interface	An interface that connects an IoT device to a network (e.g., Ethernet, Wi-Fi, Bluetooth, Long-Term Evolution [LTE], Zigbee, Ultra-Wideband [UWB]).
Physical Identifier	A device identifier that is expressed physically by the device (e.g., printed onto a device's housing, displayed on a device's screen).
Remote Logical Access	Logical access to an IoT device that occurs over a network.
Sensor	A portion of an IoT device capable of providing an observation of an aspect of the physical world in the form of measurement data. [4]
Software	"Computer programs and associated data that may be dynamically written or modified during execution." [5]
Transducer	A portion of an IoT device capable of interacting directly with a physical entity of interest. The two types of transducers are sensors and actuators. [4]
Update	A patch, upgrade, or other modification to code that corrects security and/or functionality problems in software or firmware. (derived from [27])