



**INTERNET
SECURITY
ALLIANCE**

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October 20, 2009

Julius Genachowski
Chairman
Federal Communication Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Genachowski,

I am writing on behalf of the Internet Security Alliance to request that the Federal Communications Commission carefully consider the cyber security implications of any rule or rulemaking procedure with respect to, so called, "net neutrality."

The Internet Security Alliance is a 501 C 6 Trade Association created in association with Carnegie Mellon University which represents major corporate users of the Internet. We represent banks, insurance companies, defense contractors, manufacturers as well as information technology and telecommunications companies. Our mission is to combine advancements in technology with pragmatic business issues and effective public policy to create a sustainable system of world-wide cyber security.

It is our strong recommendation the process used to investigate and determine the proper course of action on net neutrality appreciate the extensive implications that implementing net neutrality may have on the ability of the owners and operators of our electronic communications systems to defend themselves and our nation from the constantly evolving threats to our nation's electronic communications systems and the critical infrastructures that rely on these systems.

The traditional notion that we are served by a fairly stable telecommunications network is outdated. The Internet is a network of interconnected and often inter-dependent networks. Some of these networks are public, some private. Some are essentially sole use facilities, many are multiple use facilities most are continually changing and under constant attack.

We now know that sophisticated cyber attacks can do far more than cause communications disruptions. By infecting the networks which rely on the Internet system its is possible to cause very real and significant physical damage endangering innocent consumers and even our national security.

Adding to the imposing technical issues we face in developing an effective and sustainable cyber security system is the fact that the economics of cyber security

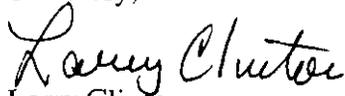
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invariably favor the attackers. Cyber attacks are comparatively easy and cheap to launch, the perimeter to be defended is virtually limitless and the “profits” that can be generated by cyber attacks can be enormous. On the contrary, cyber defense can be very difficult and costly with often limited return on investment for the entity attempting to defend itself and the others who may be dependent on the system.

As a result, one of our most pressing problems is the need to stimulate fairly constant investment in network management to address the continually evolving attacks we are facing.

If the Commission decides to act in the area of network neutrality The Internet Security Alliance urges that the process very carefully develop a sophisticated and full discussion of the potential disincentives for network management and security systems that may result from imposing rules designed without fully analyzing these issues.

Sincerely,

A handwritten signature in black ink that reads "Larry Clinton". The signature is written in a cursive, flowing style.

Larry Clinton
President & CEO
Internet Security Alliance

CC: Commissioner Meredith Attwell Baker
Commissioner Michael J. Copps
Commissioner Mignon Clyburn
Commissioner Robert M. McDowell