

**Before the
Public Safety and Homeland Security Bureau
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	PS Docket No. 10-146
A Cybersecurity Roadmap)	GN Docket No. 09-51
)	

PUBLIC COMMENT

REQUEST FOR CLARIFICATION

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1. The Bureau in its public notice¹ requested comment on a Cybersecurity Roadmap. It is a most welcome and useful initiative. However, there is a likely unintended ambiguity in the Notice second paragraph where the Roadmap is characterized as addressing “...vulnerabilities to *core Internet* protocols and technologies and threats to end-users...[emphasis added].” Thus, a very narrow scope (i.e., “core Internet) is conveyed, notwithstanding the first paragraph stating that “...the roadmap should identify the five most critical cybersecurity threats to the communications infrastructure.” Additionally, the third paragraph requests more generally “[w]hat are the most vital cybersecurity vulnerabilities for communications networks or users?”

2. It is not apparent that the Bureau actually intended the focus to be on only core Internet protocols and technologies and the resulting threats. The term “Internet” today is almost impossible to define, and essentially meaningless in a cybersecurity context. As a result, all well-known definitions of cybersecurity articulate the term in broadly, including the current globally accepted definition.²

3.2.4 **cyber environment**: This includes users, networks, devices, all software, processes, information in storage or transit, applications, services, and systems that can be connected directly or indirectly to networks.

3.2.5 **cybersecurity**: Cybersecurity is the collection of tools, policies, security concepts, security safeguards, guidelines, risk management approaches, actions, training, best practices, assurance and technologies that can be used to protect the cyber environment and organization and user's assets. Organization and user's assets include connected computing devices, personnel, infrastructure, applications, services, telecommunications systems, and the totality of transmitted and/or stored information in the cyber environment. Cybersecurity strives to ensure the attainment and maintenance of the security properties of the organization and user's assets against relevant security risks in the cyber environment. The general security objectives comprise the following:

- Availability
- Integrity, which may include authenticity and non-repudiation
- Confidentiality.

¹ See Public Notice, *FCC Seeks Public Comment on National Broadband Plan Recommendation to Create a Cybersecurity Roadmap*, DA 10-1354, August 9, 2010

² Rec. ITU-T X.1205 (04/2008), *Overview of cybersecurity*.

3. Lastly, the rather significant recent U.N. Report on *Developments in the Field of Information and Telecommunications in the Context of International Security* prepared by the 15-member Group of Governmental Experts eschews the term “cyber” altogether, focusing on “threats, risks, and vulnerabilities” and taking “steps for the development of confidence-building and other measures to reduce the risk of misperception resulting from Information and Communication Technology (ICT) disruptions.”³ The report is intended to reduce the likelihood of unintended Nation State conflicts, and a matter properly within the ambit of the Commission’s basis for developing the instant Roadmap.

4. Yaana Technologies (Yaana) is a Silicon Valley based company focused globally on providing unique and high-value Managed Services to enterprises and networked communications service providers that include cybersecurity, identity management, and forensic compliance capabilities for service providers, including Trusted Third Party implementations. In the course of these activities, Yaana principals have participated for many years in numerous domestic and international technical and policy forums dealing with cybersecurity. Mr. Rutkowski presently is the appointed Rapporteur for Cybersecurity in the principal global intergovernmental/industry venue for technical cyber security matters, the Geneva-based International Telecommunication Union – Telecommunication Standardization Sector (ITU-T) as well as the Rapporteur for the global eWarrant technical specification in the European Telecommunication Standardization Institute (ETSI), but not commenting in either of those capacities in this proceeding.

5. In light of the above considerations, Yaana requests the Bureau consider an erratum eliminating the narrow scope of “core Internet protocols and technologies,” or otherwise clarifying that a broader Roadmap construct is intended.

³ Para. 18, United Nations General Assembly, *Report of the Group of Governmental Experts on Developments in the Field of Information and Telecommunications in the Context of International Security*, 15 July 2010.