CA/Browser Forum

http://www.cabforum.org
Email: questions@cabforum.org

SUBMITTED VIA ECFS

September 23, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
Room TW-A325
445 12th Street SW
Washington, DC 20554

RE: In the Matter of National Broadband Plan Recommendation to Create a Cybersecurity Roadmap, PS Docket No.1 0-146, GN Docket No. 09-51

Dear Ms. Dortch:

These comments are provided in response to the Commission's above-referenced request for public comment on critical challenges facing the communications infrastructure and steps that can be taken to address them. Importantly, the Commission notes that "end user lack of trust in online experiences will quell demand for broadband services, and unchecked vulnerabilities in the communications infrastructure could threaten life, safety and privacy."

The CAB Forum is a non-profit industry association of companies providing software, digital certificates, and cryptography used by the general public to browse the Internet securely using Secure Socket Layer / Transport Layer Security protocol (SSL/TLS). We have adopted a consensus-based set of guidelines for an SSL/TLS certificate known as the Extended Validation (EV) Certificate. Although EV Certificates do not ensure that a site operator is reputable or honest, applicants for EV Certificates undergo a stringent verification process that eliminates the potential for anonymity and assists in making them legally accountable for their actions.

As an organization, the CAB Forum believes that the lack of trusted identity and fears caused by phishing and unauthenticated communication is one of the most critical issues facing the global communications infrastructure. Phishing and similar malicious conduct on the Internet costs business and consumers billions of dollars each year, which leads to end user mistrust of the communications framework. It is paramount that communication over the Internet be authenticated through a time-tested, robust protocol like SSL and that infrastructure components use EV Certificates because they are the only SSL certificate that provide assurance that the identity of an operator has been verified—the EV Guidelines consist of identity-verification procedures, the performance of which are audited annually in accordance with audit standards adopted specifically for the EV process. EV Certificates also enhance trust by providing users with enhanced visual feedback in all of the major Internet browsers.

Finally, the EV Certificate is an open, industry-wide standard that bundles encryption, identity, site authentication, and other capabilities together that integrates protection against potential interception and spoofing within the communications infrastructure.

Any follow-up questions can be directed to questions@cabforum.org.

On behalf of the CAB Forum, I respectfully submit our comments.

Sincerely yours,

Benjamin T. Wilson, CAB Forum Membership