



November 6, 2010

Mr. John Morris, General Counsel
Center for Democracy & Technology
1634 I Street NW #1100
Washington, DC 20006

Re: Re: Federal Communication Commission CSRIC WG

Dear John,

Thank you for reaching out to the Online Trust Alliance to provide input into the CSRIC WG. As a member based non-profit organization representing the broad ecosystem, OTA's mission is to drive a trusted online ecosystem by developing and advocating best practices that mitigate emerging threats to organizations and individuals.

The CSRIC WG 8 has made progress, establishing a base line of best practices to help protect users and businesses from cybercrime and online fraud. Consistent with our submission to the Commission last month, we recognize the majority of ISPs who have made progress in helping to protect users from harm as demonstrated by Comcast, Qwest and others. As stated we believe cybersecurity and privacy self-regulation is progressing and we currently are not advocating for added regulations or rule making.

Please note while this position reflects the view of the OTA and Board, it does not necessarily represent 100% consensus of our entire membership. In the spirit of collaboration we offer additional emerging best practices to be considered as part of the Working Group's recommendations. These emerging practices should include:

1. Clarify scope and consistency of the best practices to include all forms of malware, beyond bots alone in prevention, detection and remediation recommendations.
2. Encourage the adoption of DNSSEC to help secure the critical infrastructure from emerging threats.
3. Clarify that ISPs should support inbound email authentication checks in addition to outbound authentication as specified in the draft, and include not only DKIM, and also should consider implementing ADSP and SPF, as complementary IETF standards offering the broadest level of protection from forged and malicious email.¹
4. Consider the detection and notification to consumers when possible of the use of out-of-date and end-of-life browsers, applications and ad-ons with known vulnerabilities. Such practices have been proven to significantly reduce the attack surface of a wide range of malware including the deployment of bots.

As the term of this CSRIC WG 8 expires, OTA welcomes the opportunity to participate as an active and objective contributor, representing the broad ecosystem offering subject matter expertise in cyber security and privacy.

Respectfully,

A handwritten signature in black ink that reads "Craig D. Spiezle".

Craig Spiezle
Executive Director
Online Trust Alliance

¹ <https://otalliance.org/resources/authentication/index.html>