

The Honorable Floyd Prozanski
The Honorable Kim Thatcher
State Senators

April 26, 2019

RE: **HB 2395, SECURITY OF INTERNET CONNECTED DEVICES**

Dear Chairman Prozanski and Vice-Chair Thatcher:

Thank you for the opportunity to share the viewpoints of LG Electronics USA, Inc. regarding HB 2395, a bill addressing security features for devices connected to the Internet.

We strongly believe that our consumers need to be protected from harm whether it is from privacy, cyber-security, or safety threats. This consumer protection ideal is the key to LG and its success. So in designing and manufacturing products in today's connected device environment, cyber-security is one of our highest priorities. We also believe that this connected device industry would benefit by regulating itself through national consensus standards based on the NIST framework. Also, regulation of connected devices should have risk priority based on the severity of damage; for example, death, bodily harm, or severe property damage that can be seen in the medical or automobile industry.

Notwithstanding the above if the Committee proceeds with the enactment of HB 2395, we respectfully request the Committee to amend HB 2395 to reflect the following:

- 1) Incorporate a provision that recognizes that voluntary national consensus standards (e.g. NIST based) are an acceptable path to compliance for "reasonable security"
 - a. Accordingly, consensus standards, standards development organization, security feature, unauthorized access needs to properly defined
- 2) Closing the Loophole in the Definition of "Manufacturer"
 - a. In addition to defining original equipment manufacturers (OEMs) and contracted manufacturing (or sourcing), we also propose to define products that are purchased "off the shelf" and a brand placed on them. This is to ensure that a typical smart home environment is as secure as possible by regulating the weakest link
- 3) Preemption: Federal law, regulations, or guidance regarding any connected device shall preempt State law, regulations, or guidance.

In summary, LG Electronics USA, Inc. strongly supports efforts to protect consumers from cybersecurity threats. However, we and others in the industry believe if the bill is required, it can be even stronger by incorporating the above.

Respectfully,



Kyungsu Han
Director of North America Regulatory & Environmental Affairs
LG Electronics USA, Inc.

LG Electronics USA, Inc.

1000 Sylvan Avenue
Englewood Cliffs, NJ 07632