

BSH Home Appliances Corporation, 1901 Main Street, Suite 600, Irvine, CA 92614

OREGON SENATE

JUDICIARY COMMITTEE

To the Honorable Floyd Prozanski

Cc: Senators Thatcher, Bentz, Fagan, Gelser,  
Linthicum, Manning  
Committee Counsel Fisher

Your ref./communication of: Oregon HB 2395  
Our dept./abbr.: RNA/MK-GA

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## **Oregon HB 2395 Security of Internet Connected Devices**

### **OPPOSE UNTIL AMENDED**

Dear Senator,

BSH Home Appliance Corporation is headquartered in Irvine, California, and manufactures appliances sold under the Bosch, Thermador and Gaggenau names. BSH has factories in North Carolina and Tennessee, with warehouses, sales offices and show rooms throughout the United States.

BSH Home Appliances Corporation is strongly committed to ensure security measures for internet-connected appliances. In order to do so, we see the need to address two main points missing in the current version of HB 2395:

1. Definition of “Manufacturer” does not cover a company buying off-the-shelf products outside of the US, rebranding and selling them under their own name in the US. In this case these products would not fall under the security requirements of the current bill because the company selling them is not the “Manufacturer”.
2. No clear definition of “Reasonable Security”

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- a. Security features work best if integrated into the design of a product and not added on later.
  - b. Design and Software Engineers have to design to a specific set of requirements. For instance on Product Safety we do this by adhering to the current UL or CSA Safety Standard relevant to the specific appliance. The same is true when it comes to design a product against cyber security threats.
  - c. Designing a product to “reasonable security” requirements without having the reference to a National Consensus Standard addressing cyber security, is flawed. “Reasonable security” can be argued only at a later point in court without any measurable reference what that actually meant when the product was designed.
  - d. A National Consensus Standard is revised and kept up to date depending on the technology development in that sector. It also specifies the test procedure which is used to determine compliance with this standard.
3. BSH Home Appliances Corporation will support HB 2395 if the loophole in the definition of “Manufacturer” is closed and if the “reasonable security” definition recognizes that a National Consensus Standard is an acceptable path for compliance.

Comments respectfully submitted by



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