

April 26, 2019

Oregon State Legislature  
Senate Committee on Judiciary  
900 Court St. NE  
Salem Oregon 97301

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

Dear Chairman Prozanski and Vice-Chair Thatcher,

Thank you for the opportunity to submit comments for consideration regarding HB 2395, Security of Internet Connected Devices.

Intertek is a leading Total Quality Assurance provider to industries worldwide. We are a leading United States provider of quality and safety services for a wide range of industries around the world. Our network of more than 1,000 laboratories and offices and over 44,000 people in more than 100 countries, delivers innovative Assurance, Testing, Inspection and Certification solutions for our customers' operations and supply chains.

Intertek fully supports the objective to have strong security measures for internet-connected devices. The most effective way to achieve this is through verifiable compliance to consensus standards that address the risks of non-compliance prior devices being placed on the market. We urge the committee to incorporate into HB 2395 a provision that recognizes that national consensus standards are the best way to achieve "reasonable security." The current version of the bill uses the term "reasonable security" with no definition as to what this means, how it is determined, and how it is evaluated.

To insure the effective protection of public safety we recommend that the following be included in the determination of "reasonable security":

- Make safety a priority at the design stage
- Identify potential hazards and assess the risks
- Consider foreseeable consumer use (and misuse) of the product
- Seek to eliminate, guard against, or warn users of identified risks
- Consult CPSC's Handbook for Manufacturing Safer Consumer Products for guidance and best practices





- Ensure that products meet or exceed the requirements in all applicable **voluntary consensus standards** (“voluntary standards”)

In summary, Intertek fully supports efforts to protect consumers from cybersecurity threats. We support a strong bill that provides incentives to design products with cybersecurity in mind and ensure every product in the home is secure. We would be pleased to work with the committee to help insure that any cybersecurity bill results in improving protections against cybersecurity threats.

Thank you for the opportunity to offer the following comments. If you have any questions regarding our submission, please feel free to contact me at 202-255-0350 or at [joan.sterling@intertek.com](mailto:joan.sterling@intertek.com).

Sincerely,

*J. E. Sterling*

*Joan E Sterling*

*Intertek*

*Vice President, Public & Government Affairs*

CC:

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