Template for comments and secretariat observations

Date:	Document: **LITD 17 (19143)**	Project:

MB/NC[1]	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment[2]	Comments	Proposed change	Observations of the secretariat
Granite River Labs		Scope			It is recommended to bring more clarity on the scope of the standard and definitions of IoT devices (if possible with potential examples), IoT service developers and IoT service providers. As defined in the scope of the document (points 80 and 81): The document is intended for IoT device assessment, whereas requirements defined in table 2 for IoT service developer and IoT service provider. These requirements are beyond the scope of IoT device assessment.		
SS		5.1	154	Te	In bullet 3. “constrained processing" does not seem appropriate phrase.	"constrained processing" may be replaced with "limited processing"	
SS		Table 2	229	Te	S. No 6 Control-6 it is mentioned ".....IoT security incidents should be used to...."	Replace " should" with "shall"	
SS		Table 2	229	Te	S.No 14 mentions " Use of suitable networks for the IoT systems"	This may be replaced with " Use of suitable communication networks for the IoT systems"	
SS		Table 2	229	Te	Control 14 may be reworded for more clarity	Conrol 14 may be rewritten as " Applied network and communication technologies for IoT devices and systems should meet the needs of communication, capacity and security, of IoT devices"	

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Granite River Labs		Table 2			Controls defined in Table 2 are based on a process management approach. Compliance tothese requirements needs process documents and might also need onsite process audit. Theseactivities might be happening outside the preview of Iot Device factory. Hence establishing acompliance for IoT device point of view will be difficult and continuous monitoring of such processcontrols will be beyond scope of this document		
SS		Table 4	234	Ed	Better readability	At S. No 5 in Control - 33 replace " in designing" with " while designing"	
SS		Annexure A	243	Te	The language of V17.1 does not match exactly with Meity IPHW order dt. 9th April 2024. Meity order clause 2.11 - Verify that the firmware can perform automatic firmware updates upon a predefined schedule. V17.1 - Ensure that the update procedure is defined and includes validation of updates, configuration choices for automatic/manual updates, scheduling options, and notification settings.	Both may be made identical for clarity and uniformity.	

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					The update should maintain the cryptographic chain of trust with the root of trust.		
SS		Annexure A	243	Te	Meity order clause 3.3 not preset in IS 19143 Meity order clause 3.5 not preset in IS 19143	This may be looked into	
Granite River Labs		Table 6/ Annexure A	249		Point 62 requires a "Process audit of the key lifecycle management process". This can be replaced with process documentation.	Replace "Process audit of the key lifecycle management process" with “process documentation”.	
Granite River Labs	253	Annex B			Examples of devices for each level can be helpful.		
SS		5.1	147-148	Ed	The heading of bullet 1. is Intended Outcomes hence intended word os not required in the sentence.	In the sentence replace " intended outcomes" with " outcomes"	
Criterion Networ	188	5.2	R11		"Exposure of sensitive traces on the printed circuit board increases the risk of physical tampering and unauthorized access, potentially compromising device security."	The following can be added as additional Risks under the section “5.2 Risks” **R72** – "Failure to discover and classify the device and its properties."	

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k Labs.					Additional verification point for R11 under the section “6. IoT Device Security & Privacy Verification Checkpoints” – "Unused pins should not be routed to external connections for debugging purposes and must be identified and documented through hardware schematics."	Categorize the device with model number, OS, severity (low/medium/high), and security classification (e.g., implementing MUD RFC 8520). **R73** – "Inadequate resiliency causes data loss in the event of power outages." IoT devices should be resilient to multiple power cycles and ensure data integrity during power interruptions. **R74** – "Allowing insecure protocols results in data breaches." Identify open ports through which the device can be accessed, leading to unintended data retrieval.	

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