



ISO/TMB PSC 01 **N0010**

Date: 2010-02-09

ISO/TMB PSC 01

Privacy Steering Committee

Secretariat: DIN, Germany

(on behalf of ISO/IEC JTC 1/SC 27)

Tilte: USA National Body contributions received in response to ISO/TMB PSC 01 documents N0006, N0007, N0008

Source: ANSI, National Body of United States

Project(s):

Additional information This document is circulated for consideration at the First Meeting of ISO/TMB Privacy Steering Committee (ISO/TMB PSC 01) scheduled to be held in Berlin Germany on 24th February 2010 under agenda item 5.

Due Date:

Distribution: see Annex A
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ISO/TMB PSC 01 Chairman



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Date: 2010-02-14

Von: Mark MacCarthy [mailto:maccartm@georgetown.edu]
Gesendet: Dienstag, 9. Februar 2010 22:25
An: Passia, Krystyna
Betreff: Re: ISO/TMB_PSC01_003_NEW_DOCUMENTS

Krystyna,

Thank you for the opportunity to provide input on several agenda items for the February 24 meeting of the PSC in Berlin. This constitutes ANSI's preliminary comments at this time.

1. International Conference Timing and Location

We recognize that there are certain efficiencies for the PSC Secretariat and affected others in holding the conference in conjunction with an SC27 meeting.

However, we are concerned about the proposal to hold the conference on April 18 in advance of the next SC27 meeting in Melaka. A good deal of planning and preparation is needed for a conference on such a complex subject.

As the holding of the conference is one of the major activities of the PSC, it strikes us as rather hurried to announce the event before the PSC has even met and while the PSC membership is still in the process of forming.

It may be difficult for experts in the field to arrange travel to Malaysia on what will be fairly short notice.

We would propose as an alternative that consideration be given to holding the conference in conjunction with the subsequent SC27 meeting in Berlin in October. Berlin may be a more central location in terms of travel, it will allow for more deliberative planning and preparation of the conference, and it should also be easier for the Secretariat in terms of coordinating logistics.

Objectives ANSI has always understood that the purpose of the conference was to provide a venue for information-sharing and improved coordination among ISO/IEC technical committees (TCs) engaged in privacy (i.e. protection of personally identifiable information and fair information handling) related work.

We would therefore envision presentations by the relevant TCs to elaborate on their work programmes and the responses they may have provided to the earlier survey undertaken by the TMB privacy task force. This will enable participants to ascertain the need to establish liaisons and it will serve to facilitate and complement the other goal of creating a live inventory of privacy-related standards work.

To the extent that there is a call for a strategic roadmap for standards development in this area, we note that SC27/WG5 has developed such a roadmap. A presentation by WG5 regarding that roadmap and the WG5 work programme ought to be part of the agenda. To reiterate, we believe that the focus of the conference must remain on information sharing and improved coordination in relation to relevant technical standards work. It ought not to

attempt to tackle privacy issues in the larger sense in terms of what is appropriate public policy in the area of privacy. Invitation List According to PSC document N0005, "it is intended to invite all parties involved in standardization in the area of data protection and privacy" to the conference. Perhaps this is an unintentionally broad statement, but it stands in vivid contrast to the much more limited event envisioned in the TMB privacy task force report, to wit: In order to maximize output it is recommended that such a conference not be fully open to the public. Rather ISO should issue invitations covering the Chair and possibly one or two additional representatives from those committees involved as well as inviting other key stakeholders such as CEN, the International Security, Trust and Privacy Alliance (ISTPA), and the International Conference of Data Protection and Privacy Commissioners. We agree that the conference should be by invitation only. If, in addition to the TCs involved, we are also going to invite key stakeholders outside of ISO/IEC as suggested, then those invitations should be similarly limited to no more than just a few representatives from those organizations. In that case, it would also be appropriate to invite participation from OECD and APEC.

2. Terminology Document

Our primary input on the establishment of a common terminology document is that this work should not be undertaken by the PSC. Rather, the PSC should inventory existing resources and then make a recommendation to the TMB where it feels this work should be undertaken. We note that two resources are mentioned in the TMB task force report. We also understand that the ITU-T study group 17 has recently developed a draft on baseline identity management terms and definitions. Other existing glossaries should also be taken into account.

3. Live Inventory

It would seem that much of the legwork to develop such a live inventory already has been done with the earlier survey by the TMB privacy task force. The inputs from this survey can be collated to form the basis of the inventory. It would seem that the PSC simply needs to make a recommendation to the TMB as to who should develop and maintain the inventory.

Thanks for giving us the opportunity to comment. We look forward to further discussion at the meeting.

Best,

Mark

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