

Representing:

Organisation

Organisation (if applicable):

Sierra Wireless, Inc.

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

1. IoT definition, applications and demand:

2. Spectrum requirements :

3. Network-related issues:

The success of an IoT services industry will be helped if technical standards can emerge that allow the open deployment of devices conforming to these standards, thus benefiting from both openness and innovation while ensuring interoperability.

4. Security and resilience:

IoT services platforms should be encouraged to adhere to interoperable standards, so that there can be a large choice of interoperable IoT service operators, instead of allowing a consolidation around only a handful of major market players. Such a large choice is beneficial for network security and resilience.

5. Data privacy:

IoT services platforms should be encouraged to adhere to interoperable standards, so that there can be a large choice of interoperable IoT service operators, instead of allowing a consolidation around only a handful of major market players. Such a large choice is beneficial because it will also allow customers to choose the platforms that meet their data privacy requirements, including potential regulatory requirements (such as territoriality of data storage).

6. Numbering and addressing:

7. Devices:

8. Digital literacy:

9. Data analysis and exploitation:

IoT services platforms should be encouraged to adhere to interoperable standards, so that there can be a large choice of interoperable IoT service operators, instead of allowing a consolidation around only a handful of major market players. Such a large choice is beneficial because it will also allow customers to choose the platforms that meet their data analysis and exploitation requirements, including potential regulatory requirements.

10. International developments:

The deployment of IoT services will be more quick and economically efficient if technical standards emerge for IoT services.

However, today's situation is that there are many overlapping emerging standards, and a consolidation should occur to drive down the cost of deployments.

Such consolidation will be shaped in part by market forces, but it Ofcom may take into consideration that leaving market forces be the only driver of such a consolidation may have adverse effects on a number of important areas.

In particular, if IoT services are consolidated at the sole discretion of the giants of today's internet, this may lead to serious concerns over security, privacy and innovation in Europe and in the UK.

The oneM2M global partnership project (www.onem2m.org), founded in 2012 by seven world-leading standardization organizations including the ETSI in Europe, is repeating for the IoT services industry the same standardization effort that was successfully achieved by the 3GPP in the cellular telecom industry. oneM2M defines a standard for IoT services above any network (wired, satellite, cellular or other), and doing so allows a diversity of companies and organizations to implement interoperable IoT platforms, which is essential for cost-effective IoT deployments, while allowing more freedom of choice for network security and resilience as well as data storage, processing, security and privacy. oneM2M has also already released their first candidate standard in August 2014 and opened it for comments.

UK Companies such as BT, Vodafone, Orange, Deutsche Telecom and Inmarsat are among the participating members of oneM2M.

Ofcom may be interested in getting knowledgeable in and/or promoting this standard for the development of a cost-effective, yet secure and open Internet of Things.

11. Ofcom's role :

Ofcom may be interested in getting more knowledgeable or even involved in emerging IoT services standards. It may also provide input to such standards so that they can meet regulatory requirements, and it can also monitor and/or encourage standardization for the development of a cost-effective yet open Internet of Things.

12. Additional comments:

