



MITA[®]
MEDICAL IMAGING
& TECHNOLOGY ALLIANCE
A DIVISION OF **NEMA**[®]

1300 North 17th Street • Suite 900
Arlington, Virginia 22209
Tel: 703.841.3200
Fax: 703.841.3392
www.medicalimaging.org

1/11/2022

Ms. Katerina N. Megas, et al.
National Institute of Standards and Technology
Applied Cybersecurity Division
Information Technology Laboratory
100 Bureau Drive
Gaithersburg, MD 20899

RE: Consumer Cybersecurity Labeling for IoT Products - Discussion Draft on the Path Forward

Dear Ms. Megas:

As the leading trade association representing the manufacturers of medical imaging equipment, radiopharmaceuticals, contrast media, and focused ultrasound therapeutic devices, the Medical Imaging & Technology Alliance (MITA) supports the National Institute of Standards and Technology (NIST) in its continued work to enhance cyber resilience. We applaud this discussion draft as an important step towards greater cybersecurity in critical sectors like healthcare.

MITA understands this NIST draft to scope Consumer Internet of Things (IoT) products similar to the the recent draft document, “Baseline Criteria for Consumer Software Cybersecurity Labeling”. That document describes Consumer Software as “software normally used for personal, family, or household purposes” and appropriately distinguishes these software from enterprise or production software.

However, this distinction is not overt within the Consumer Cybersecurity Labeling for IoT Products discussion draft and we urge NIST to ensure a similar statement is made to distinguish consumer IoT products from other, non-consumer products. For instance, the scoping statement could read “IoT products normally used for personal, family, or household purposes”.

We thank you for your consideration of these comments. If you have any questions, please contact Zack Hornberger, Director of Cybersecurity & Informatics, at zhornberger@medicalimaging.org or 703-841-3285.

Sincerely,

Patrick Hope
Executive Director, MITA

MITA is the collective voice of manufacturers of medical imaging equipment, radiopharmaceuticals, contrast media, and focused ultrasound therapeutic devices. It represents companies whose sales comprise more than 90 percent of the global market for medical imaging innovations. These products include: magnetic resonance imaging (MRI), medical X-Ray equipment, computed tomography (CT) scanners, ultrasound, nuclear imaging, radiopharmaceuticals, and imaging information systems. MITA Member company technologies are an important part of our nation's healthcare infrastructure and are essential for the screening, diagnosis, staging, managing and effectively treating patients with cancer, heart disease, neurological degeneration, and numerous other medical conditions.