14 September 2007

The Honorable Michael Chertoff
Secretary
U.S. Department of Homeland Security
Washington, DC 20528

Dear Secretary Chertoff:

The Institute of Electrical & Electronics Engineers-United States of America (IEEE-USA) believes that there is a need for security professional development and that the Executive Order on National Security Professional Development will be a good first step in that direction.

Based on the experience and knowledge of IEEE-USA members in both the policy and technical aspects of security issues, we recommend that the committee authorized by the executive order consider the following augmentation to the contents of the order:

- The private sector has considerable experience in developing countermeasures to attacks on critical infrastructures. For example, network companies have implemented methods for mitigating denial of service attacks on the Internet. This expertise should be tapped by adding industry representatives to the committee.

- IEEE-USA has members in academia, business, and research who have investigated issues such as the tradeoff between the risk of an attack and the cost of mitigating an attack. Another example is the development of intrusion detection monitors for highlighting anomalous traffic in networks that are suggestive of attempts to damage user facilities. In addition to academic representation on the committee, we suggest that the committee consider grants to research organizations specifically focused on advances in protecting the nation’s critical infrastructure.

- We think it important that individuals who are responsible in both the public and private sectors for implementing security policies should demonstrate competency in this area. Therefore, we recommend that the committee advocate the certification of security professionals through accredited organizations or educational institutions.

- There is a need for formal security standards that define a minimum level of security for which compliance can be measured. These standards are needed in all of the three layers specified on the DHS National Infrastructure Protection Plan (NIPP): Physical, Cyber, and People.
We recommend that the Federal Energy Regulatory Commission (FERC) be included in the National Strategy. FERC is an independent regulatory agency within the United States Department of Energy. The FERC is independent of the Department of Energy. Neither the President nor Congress review FERC decisions. Besides regulating vast gas and electricity infrastructure, FERC makes decisions on the natural gas facilities, including pipelines, storage and liquefied natural gas.

IEEE-USA advances the public good and promotes the careers and public policy interests of more than 215,000 engineers, scientists and allied professionals who are U.S. members of the IEEE. IEEE-USA is part of the IEEE, the world's largest technical professional society with 370,000 members in 160 countries. See http://www.ieeeusa.org. For more information, please contact Deborah Rudolph at (202) 530-8332, or at d.rudolph@ieee.org.

Sincerely,

John W. Meredith, P.E.
President, IEEE-USA

(Letter also sent to Dr. Robert M. Gates, Secretary, U.S. Department of Defense, The Pentagon)