

## Mathea Fammels

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**From:** Peter Fischer [peter.fischer@vizuri.co.uk]  
**Sent:** 11 March 2008 18:37  
**To:** ENISA Economics NIS  
**Subject:** Analysing Barriers and Incentives for Network and Information Security in the Internal Market for e-Communication

As requested by Mathea I have read the paper and have the following comments:

General

The paper adopts a somewhat academic, utopian approach. Whilst I endorse the recommendations in principle, some of the actions need to be tempered by business realities

Recommendation 1

Great care will be needed to protect commercial confidentiality unless and until any negligence or culpability can be established. The damage to a company could be substantial – especially in the financial sector.

Recommendation 2

Agree – but see the issue of confidentiality against Recommendation 1.

Recommendations 3 and 4

Agree

Recommendation 5

I fear that this recommendation is naïve as presented. There are 2 issues:

- a. security features of products should be enabled by default
- b. developers/vendors need to demonstrate due diligence in the testing of security features – this need not be expensive but I am wary of self-certification. Quick and inexpensive independent testing (e.g. using the UK CCT Mark model) is available.

Recommendations 6 and 7

Agree

Recommendations 8 and 9

Agree

Recommendation 10

No comment

Recommendation 11

I do not believe that ENISA should be seduced by this slightly-veiled attack on dominant players in the marketplace. However, it remains important to enable the minority to participate and not establish processes which exclude, for example Apple Mac users.

Recommendation 12

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No comment

Recommendation 13

Agree

Recommendation 14

I remain unconvinced that this expensive approach will represent Value For Money. Agree that something needs to be done, but would recommend practical research and prototyping before a decision is taken on how best to tackle this issue.

Recommendation 15

Again, this smacks of a personal agenda amongst academics who tend to resent even a sniff of constraint. I am not aware of any significant issues encountered by security professional with the implementation of legislation in the UK.

Apologies for the long email. I hope this is helpful. If you require any further input, please contact me.

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