Smart Device Security Rules Feedback

While the rules require companies to publish a period for which they provide support; there are significant gaps which may limit its effectiveness, specific callouts are:

- To provide security updates promptly when security issues arise (ETSI 5.3-8 requires updates to be 'timely')
- To provide a secure update mechanism (ETSI Provision 5.3-2)
- To provide a user consumable method for installing updates (ETSI Provision 5.3-3)
    - The rules as stated, mean a manufacturer can design their products so that updates can not be applied (ETSI Provision 5.3-1 says this shouldn't normally be done and 5.2-15b requires a replacement plan for when devices can't be updated)
- To provide updates free of charge/obligation

There are multiple other provisions in part 5.3 (Keep Software Updated) of the ETSI standard which are not reflected in the rules, however the above are probably the most significant enablers.