

Disclosing Vulnerabilities and Breaches in the 'Internet of Things'

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What will the IoT change?

- Privacy made the early running with the smart TV and the Cayla doll – but your phone already hears everything and is full of adware
- Denial-of-service was next with the Mirai botnet – but we already have botnets
- But safety looks like the real pressure point
- Phones and laptops don't kill many people directly; cars and medical devices do...

How does IoT change safety?

- Eireann Leverett, Richard Clayton and I did a project for the European Commission
- The EU has complex regulatory regimes for the safety of all sorts of devices
- How will these have to change once there's software everywhere?
- We looked specifically at vehicles, medical devices, and electrotechnical equipment
- But the lessons are more widely applicable!

EU problem statement

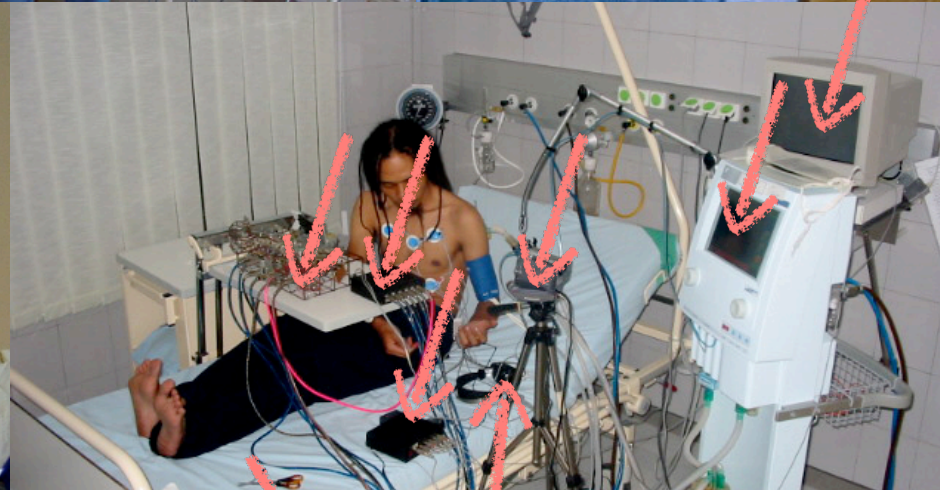
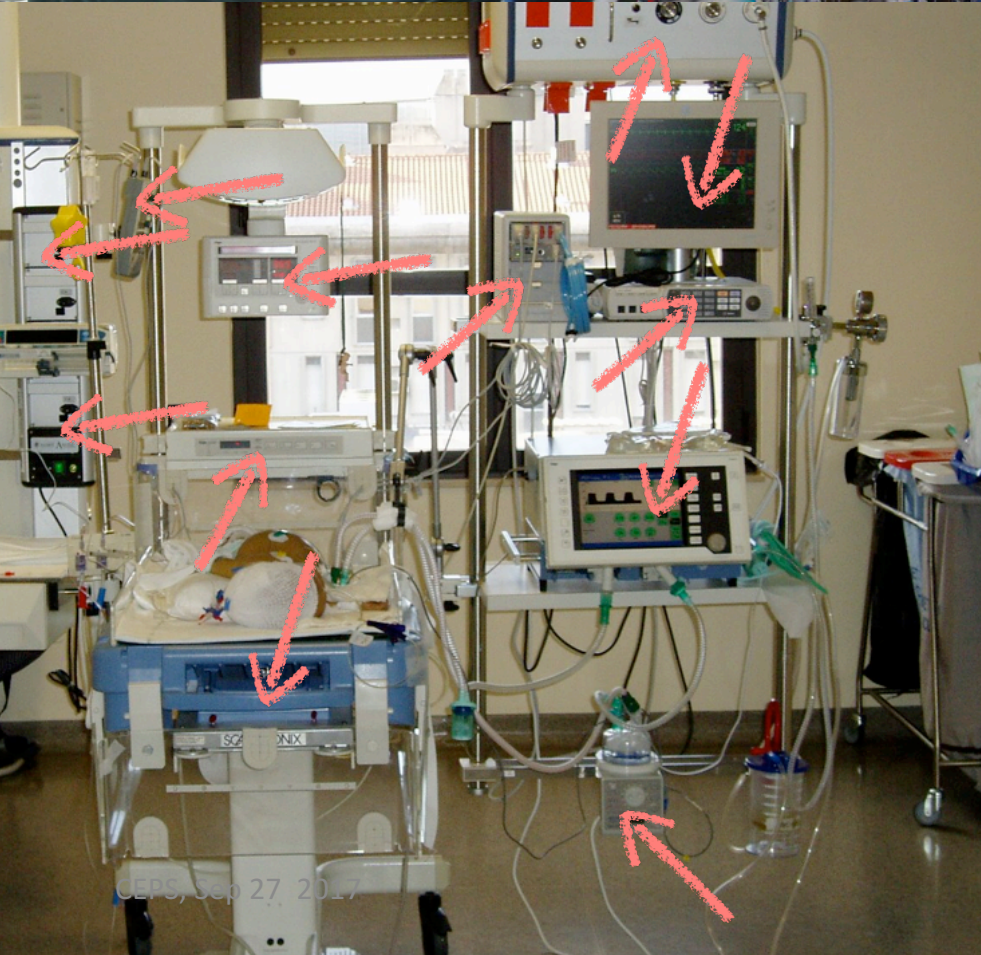
- We regulate safety in many industries
- The “Internet of Things” puts computers and communications everywhere
- This creates new safety risks around security
- Indeed, the two are the same in the languages spoken by most EU citizens (sicurezza, seguridad, sûreté, Sicherheit, trygghet...)
- How do we update safety regulation (and safety regulators) to cope?

Background

- Markets do safety in some industries (aviation) way better than others
- Cars were dreadful until Nader's 'Unsafe at Any Speed' fired up the public, got insurance industry involvement and led to the NHTSA
- In the EU, we got the Product Liability Directive 85/374/EES, Framework Directive 2007/43/EC on type approval, and much much else
- Broad principles, plus many detailed rules

Background (2)

- Traditional car makers moving to autonomy in steps (adaptive cruise control, automatic emergency braking, automatic lane keeping...)
- Tesla has already moved to regular upgrades and the legacy OEMs are racing to follow
- But managing vulnerabilities is hard, and expensive: Android is patched for 3 years, Windows for 5
- So how will we patch a 2017 car in 2037?





Background (3)

- The Medical Device Directives (90/385 EEC, 93/42/EEC, 98/79/EU) are now being revised
- Research by Harold Thimbleby: in the UK, hospital safety usability failures kill about 2000 p.a. (about the same as road accidents)
- Priority: get regulators to do post-approval studies and adverse event reporting
- At present devices are typically approved on paperwork alone
- Even less post-market feedback than in pharma...

Background (4)

- Usability failures that kill are typically blamed on the nurse (if noticed at all)
- But attacks are much harder to ignore – a 2015 wifi tampering demo led the FDA to blacklist the Hospira Symbiq infusion pump
- 2017: recall of 450,000 St Jude pacemakers
- But software upgrades can break certification!
- Proper safety / security lifecycle is needed

The Big Challenge

- Established non-IT industries usually have a static approach – pre-market testing with standards that change slowly if at all
- The time constant is typically a decade
- When malicious adversaries can scale bugs into attacks, industries will need a dynamic approach with patching, as in IT
- The time constant is then typically a month

Broad questions include...

- Who will investigate incidents, and to whom will they be reported?
- How do we embed responsible disclosure?
- How do we bring safety engineers and security engineers together?
- Will regulators all need security engineers?
- How do we prevent abusive lock-in? Note the US DMCA exemption to repair tractors ...

Institutional Players

- Dozens of European regulators (+ hundreds in Member States)
- Standards bodies (UNECE, ETSI, CEN, CENELEC)
- Safety labs (KEMA, EuroNCAP, ...)
- Security labs (CLEFs, Underwriters' Labs, commercial pen testers, ENCS, academics ...)
- Other custodians of the many safety and security standards including NIST, IEEE, IEC
- Other principals, e.g. insurance industry

Policy recommendations included

- Require vendors to self-certify, for their CE mark, that products can be patched if need be
- Require a secure development lifecycle with vulnerability management (ISO 29174, 30111)
- Create a European Security Engineering Agency to support policymakers (now: ENISA)
- Extend Product Liability Directive to services
- Update NIS Directive to report breaches and vulnerabilities to safety regulators and users

Translating this to engineering

- The problem as always will be scale
- Europe has 50,000 fatal accidents a year and ten times that many causing serious injury
- Future cars will generate vast amounts of data
- How do the right data get to traffic cops, insurers, safety regulators and others?
- We can't just report vulnerabilities and breaches to ENISA / SIAs / DP agencies!
- Culture change too (e.g. VW v Birmingham)

Implications for computer science

- Computer science has always been about managing complexity
- Safety-critical durable goods, online, and composed of heterogeneous components from mutually mistrustful suppliers, are the new grand challenge
- Since doing this project I've started teaching safety and security together in the same course to first-year undergraduates

Conclusions

- The EU regulates safety in dozens of industries
- Once safety-critical goods can be attacked online, it's patch or scrap
- For durable goods like cars and medical devices, this will be a really really big deal
- To manage the ecosystem, a vast amount of data on vulnerabilities, breaches and accidents will have to be managed
- Many policy challenges lie ahead!

More ...

- Our paper “Standardisation and Certification in the Internet of Things” is on my web page
<http://www.cl.cam.ac.uk/~rja14/>
- Or see “When Safety and Security Become One” on our blog
<https://www.lightbluetouchpaper.org>
which also has a couple of videos

Security Engineering

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