



## AHRI Policy Position Cybersecurity and the Internet of Things

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The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) is the trade association representing manufacturers of heating, ventilation, air-conditioning, refrigeration (HVACR) and water heating equipment within the global industry. AHRI's more than 320 member companies account for over 90 percent of HVACR and water heating residential and commercial equipment manufactured and sold in North America.

### Background

AHRI recognizes that the threat of cyberattacks increases with the adoption of Internet-connected devices, including connected HVACR and water heating equipment. Across the states, legislators and agencies are taking action to mitigate these threats, while at the same time, seeking opportunities to maximize energy savings in homes and businesses through increasing the deployment of smart grid technology and connected home management devices.

Many AHRI members produce technologies that will allow for reactive optimization of building loads and capture of energy usage data for consumers and utilities, as well as other energy saving optimizations and changes to the operation of HVACR and water heating equipment. However, implementing these technologies will require a comprehensive cybersecurity strategy to prevent breaches that could compromise data and the safe operation of connected HVACR and water heating equipment.

### Industry Position and Policy Considerations

As more HVACR and water heating products increase their connectivity to the Internet and broader interconnected residential and commercial systems, industry recognizes that steps must be taken to ensure that these products are secure. Manufacturers support cybersecurity and "Internet of Things" policies that encourage innovation among manufacturers and rely on voluntary, industry-led best practices aimed at ensuring products are safe from the threat of hacking or malfeasance.

Further, as states consider adoption of specific security requirements for connected devices, AHRI supports the inclusion of language allowing for compliance via industry consensus standards. Policymakers can incorporate relevant standards by reference, thereby providing industry with the clarity necessary to ensure that their products are compliant with the law while allowing for continuous improvement and adoption of best practices. AHRI opposes broad cybersecurity policies that do not include clear compliance pathways and/or expose manufacturers to undue liability.

Finally, prescriptive regulatory frameworks should not be imposed, and AHRI encourages policymakers to adopt consistent state policies and practices that ensure the proper handling of data through inclusion of industry best practices and standards. All policies should allow for market-based solutions that are technology-neutral, open and interoperable.

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