



July 20<sup>th</sup>, 2022

To whom it may concern,

We are writing to encourage you to curtail the practice of reuse of WiFi passwords on telematics devices installed in the class 7 & 8 vehicles of our fleet members.

Reuse of WiFi passwords on telematics devices does not satisfy the FMCSA [Cybersecurity Best Practices for Integration/Retrofit of Telematics and Aftermarket Electronic Systems into Heavy Vehicles](#) guideline GDL 40 and 43. But more importantly, the devices installed by the fleets must be provided in a state that allows for unique WiFi passwords, as captured in the NMFTA [Telematics Security Requirements Matrix](#) (TSRM) AC-080<sup>1</sup>.

The continuation of this practice undermines the protection afforded by a WiFi password at all, especially when the password is reused in a large number of devices. WiFi passwords can be cracked by bad actors and, when such passwords are reused, the result is that the bad actors can scale their attacks. To avoid such results, the devices should be configured with passwords that are unique to each device and the unique passwords should be chosen such that they are not derived from any public information about the device. For example, a WiFi password based on the device MAC address is not a good solution.

For more security requirements on telematics devices please see the NMFTA [Telematics Security Requirements Matrix](#) project on GitHub. If you are interested in contributing to the development of future revisions of the security requirements for telematics or trucks please join our working group which meets virtually on a monthly basis.

Best Regards,

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<sup>1</sup> The requirement details are available for download in an excel worksheet there. Or also viewable in a new, experimental, online format here: [https://nmfta-repo.github.io/vcr-experiment/vcr-experiment/00\\_tsrn.html#-AC-080](https://nmfta-repo.github.io/vcr-experiment/vcr-experiment/00_tsrn.html#-AC-080)