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As a general comment and question; how will the Cybersecurity Standards integrate with the Financial Services Industry. Your table identifies several other critical infrastructures, but FS seems glaringly missing from the consideration. The recently released FFIEC Cybersecurity Assessment “tool” is a poor representation of how to get financial institutions to improve their security and should use NIST Cybersecurity Framework directly rather than have to map back to it to be sure it is in somewhat alignment to the framework. An illustration of a government agency run amuck in my opinion.

**Internal Standardization to Achieve U.S. Objectives for Cybersecurity, is going to be a challenge. How can we expect international standardization to work when we can’t even get US GOV agencies to work directly with the NIST frameworks and tools that already exist, ICS-CERT CSET Cybersecurity Assessments (<https://ics-cert.us-cert.gov/Assessments>), CERT Resilience Management Model (<http://www.cert.org/resilience/products-services/cert-rmm/>).**

Frustrating to watch the added burden that this FFIEC tool is placing on small banks for unknown value add and little real “tool” to help them improve.

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