

From: [Thomas McCarthy](#)
To: [cyberframework](#)
Subject: Comments on NIST Cybersecurity Framework 2.0 initial public draft
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Thank you for providing the August 8th CSF 2.0 draft for review. I have a few comments:

In line with the developing standards and regulations (ex. EU Cyber-resilience Act), Software and Firmware are driven to support other functions than just "PROTECT". As defined by these standards, SW/ FW resiliency requires PROTECT, DETECT and RECOVERY functions.

There can be an interpretation made by only categorizing SW/FW under the PROTECT function as being fulfilled through denying network and system access.

I would recommend inclusion of software and firmware in DETECT and RECOVER to create an understanding that there is a need for resilient technology, not just best practices.

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