November 3, 2023

VIA EMAIL: cyberframework@nist.gov

National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, MD 20899

RE: Public Draft: The NIST Cybersecurity Framework 2.0

Dear NIST:

NTCA – The Rural Broadband Association (NTCA) welcomes this opportunity to offer feedback on the public draft of the NIST Cybersecurity Framework 2.0 (CSF). NTCA represents approximately 850 community-based companies and cooperatives that provide advanced communications services in rural America and more than 400 other firms that support or are themselves engaged in the provision of such services.

NTCA supports the updates NIST has made to the CSF and in particular agrees that the newly added Govern function is an important and necessary component for an organization's meaningful cybersecurity risk management strategy, expectations and policy. NTCA also supports the inclusion of examples as a means of providing some clarity for the listed subcategories; however, given the requirement by multiple federal agencies for certain companies to implement NIST CSF guidelines, NTCA encourages NIST to emphasize that the examples are intended solely to be instructional and not expectations. Without such clear affirmation, companies risk being found lacking appropriate cybersecurity measures if they have not implemented all of the examples exactly as written.

Thank you for the opportunity to engage with NIST on this important update. Please contact the undersigned if you have any questions.

Sincerely,

/s/ *Michael Romano*
Michael Romano
Jill Canfield
Tamber Ray
NTCA–The Rural Broadband Association