#	Organization	Commentor	Type	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	Siemens	Siemens Industry Automation	ICS vendor	1	80-81	1	The original wording could be misinterpreted as asserting that effectively managing cybersecurity risks requires a clear understanding of only the security challenges and considerations that are specific to IT and ICS products. Effectively managing cybersecurity risks actually requires a clear understanding of the security-related attributes of computerized products and of the ways in which owners and operators integrate those products into their properties and then operate those properties.	The sentence should read: "Effectively managing cybersecurity risks requires a clear understanding of the security challenges and considerations involved in configuring and operating assets and solutions that include IT and ICS."
2	Siemens	Siemens Industry Automation	ICS vendor	1	91-94	1	The original wording could be misinterpreted as asserting that security standards can drive innovation only in the products and services that owners and operators purchase. Security standards actually can drive innovation not just in the products and services that owners and operators purchase, but also in the operational practices that owners and operators follow.	The two sentences should read: "The use of standards will enable economies of scale to drive innovation and development of effective products, services, and practices that meet identified market needs. Market competition also promotes faster diffusion of these technologies and practices, and realization of many benefits by the stakeholders (including, but not limited to, suppliers, systems integrators, and owners and operators) in these sectors."

3	Siemens	Siemens Industry Automation	ICS vendor	3	162-163	1.2	The original wording could be misinterpreted as asserting that the Cybersecurity Framework seeks to address risk only to IT and ICS assets/systems. The risk that the Cybersecurity Framework ultimately seeks to address is often to a piece of infrastructure that includes IT and ICS systems. The distinction matters, because reasonable risk mitigation often includes measures directed not just at the IT and ICS systems within a piece of infrastructure, but also measures directed at the configuration and management of the entire piece of infrastructure.	The sentence should read: "With this information, organizations determine the acceptable level of risk for their assets, systems, and enterprises, expressed as their risk tolerance."
4	Siemens	Siemens Industry Automation	ICS vendor	3	172-173	1.2	The original wording could be misinterpreted as asserting that IT and ICS security risk management is the only kind of cybersecurity risk management that should concern an owner or operator of critical infrastructure. The effective management of cybersecurity risk actually includes attention to asset configuration, employee training and management, and operational procedures, as well as attention to the IT and ICS systems used by the organization.	The sentence should read: "Thus, the Framework gives organizations the ability to dynamically select and direct improvements in IT and ICS systems, asset configuration, employee training and management, and operational procedures."
5	Siemens	Siemens Industry Automation	ICS vendor	6	242	2.1	The sentence could be misinterpreted as asserting that the functions in the Framework Core apply only to IT and ICS. The functions in the Framework core actually apply to asset configuration, employee training and management, and operational procedures, as well as to IT and ICS. The sentence does not seem to be necessary, since the Framework repeatedly makes clear elsewhere that its suggestions are applicable both in IT environments and in ICS environments.	Simply delete line 242 (“The five Framework Core Functions defined below apply to both IT and ICS.").

6	Siemens	Siemens Industry Automation	ICS vendor	13-25	NA	ID.AM-1, ID.AM-2, ID.AM-3, ID.AM-5, ID.AM-6, ID-BE-3, ID-GV-1, ID-GV-2, ID.GV-3, ID.RA-1, ID.RA-2, ID.RA-3, ID.RA-4, ID.RM-1, ID.RM-2, PR.AC-1, PR.AC-2, PR.AC-3, PR.AC-4, PR.AC-5, PR.AT-1, PR.AT-2, PR.AT-3, PR.AT-4, PR.AT-5, PR.IP-1, PR.IP-2, PR.IP-3, PR.IP-4, PR.PT-1, DE.AE-1, DE.AE-5, DE.DP-1, DE.DP-	The International Electrotechnical Commission (IEC) has adopted the ISA 99.02.01 document as IEC 62443 Part 2-1 Edition 1.0. When the IEC's members reach consensus to adopt a document, as they have done in the case of ISA 99.02.01, that adoption gives the document additional international credibility. Consequently, including parenthetical citations to the IEC-adopted version of ISA 99.02.01 would be in keeping with NIST's statement that "[t]he Framework is designed to allow for the use of international standards that can scale internationally," and with the Executive Order's directive that the "Framework shall be consistent with voluntary international standards when such international standards will advance the objectives of [the] order." The parenthetical cross-references would also avoid confusion on the part of those owners and operators who have grown accustomed to using the IEC-adopted version of the document.	In the Framework Core's Table 1, each citation to a section or sections of ISA 99.02.01 should be expanded to include a parenthetical citation to the corresponding section or sections of IEC 62443 Part 2-1 Edition 1.0. For example, the "ISA 99.02.01 4.2.3.4" citation in the ID.AM-1 row of the Framework Core's Table 1 should be expanded to read: "ISA 99.02.01 4.2.3.4 (IEC 62443 Part 2-1 Edition 1.0 4.2.3.4)."

7	Siemens	Siemens Industry Automation	ICS vendor	13-25	NA	ID.AM-1, ID.AM-2, ID.AM-3, ID.AM-5, ID.AM-6, ID.BE-1, ID.BE-4, ID.GV-1, ID.GV-2, ID.GV-3, ID.RA-1, ID.RA-2, PR.AC-1, PR.AC-2, PR.AC-3, PR.AC-4, PR.AC-5, PR.AT-1, PR.AT-2, PR.AT-3, PR.AT-4, PR.AT-5, PR.DS-1, PR.DS-2, PR.DS-3, PR.DS-4, PR.DS-5, PR.DS-7, PR.DS-8, PR.IP-9, PR.IP-2, PR.IP-3, PR.IP-4,	The IEC is in the process of developing IEC 62443 Part 2-1 Edition 2.0. That document, which is currently in Commented-Draft state, was formed by taking the ISO 27001 document and adding content that is particularly relevant to ICS. Since Section 1 of the Framework Core places as much emphasis on ICS as it does on IT, the references to sections of ISO 27001 in Table 1 of the Framework Core should be expanded to include parenthetical citations to the corresponding sections of IEC 62443 Part 2-1 Edition 2.0 Commented Draft. Although the IEC has not yet completed the process of adopting IEC 62443 Part 2-1 Edition 2.0, the document's internal numeration relative to these citations is not likely to change. When the Cybersecurity Framework is published in February 2014, many stakeholders will begin to rely upon the specific references that appear in Table 1 of the Framework Core. By including parenthetical citations to the IEC 62443 Part 2-1 Edition 2.0 Commented Draft in the February 2014 version of the Framework, NIST can avoid confusing those stakeholders who have already grown accustomed to the IEC version of the ISO 27001 document.	In the Framework Core's Table 1, each citation to a section or sections of ISO/IEC 27001 should be expanded to include a parenthetical citation to the corresponding section or sections of IEC 62443 Part 2-1 Edition 2.0 Commented Draft. For example, the "ISO/IEC 27001 A.7.1.1, A.7.1.2" citation in the ID.AM-1 row of the Framework Core's Table 1 should be expanded to read: "ISO/IEC 27001 A.7.1.1, A.7.1.2 (for ICS: IEC 62443 Part 2-1 Edition 2.0 Commented Draft 7.1.1, 7.1.2)."