



December 13, 2013

Information Technology Laboratory, ATTN: Adam Sedgewick  
National Institute of Standards and Technology  
100 Bureau Drive, Stop 8930  
Gaithersburg, MD 20899-8930

Via e-mail to: [csfcomments@nist.gov](mailto:csfcomments@nist.gov)

RE: Preliminary Cybersecurity Framework Comments

Dear Mr. Sedgewick,

Merck has been privileged to participate in the development of the Cybersecurity Framework and appreciates the opportunity to provide comments on the current preliminary framework.

Merck discovers, develops, and provides innovative products and services that save and improve lives around the world. Through our prescription medicines, vaccines, biologic therapies, and consumer care and animal health products, we work with customers and operate in more than 140 countries. We support public policies that advance the interests of patients, improve public health and promote access to medicines and innovation. Cybersecurity standards and frameworks are essential components of our information risk management strategy to ensure the quality and integrity of our clinical, laboratory, manufacturing, and supply chain processes. These processes deliver critical medicines to patients and the nation's workforce across all sectors.

Merck has begun adoption and implementation of the Cybersecurity Framework. Our ongoing activities include: 1) internal socialization of the framework by aligning IT risk management activities to the five framework functions in executive presentations; 2) analysis of our information security policy for gaps across references provided by the framework; 3) characterization of our cybersecurity investment portfolio in terms of the functions, categories, and subcategories of the framework; and 4) mapping our industry-specific regulatory requirements (21 CFR Part 11 and EU Annex 11) to controls aligned with the framework. The attached comments show a lack of any fundamental issues experienced during Merck's adoption and implementation of the Framework.

Merck commends NIST's superior leadership in advancing the foundation of cybersecurity through this new Framework and looks forward to continued evolution and expanded adoption within the Health and Public Health sector. Congratulations on a job well done.

Sincerely,

Terry Rice  
Chief Information Security Officer  
Merck & Co., Inc.

