
Preliminary Cybersecurity Framework Comments

Walter Retzsch

Re: API Comments on Preliminary NIST Cybersecurity Framework

To: Information Technology Laboratory

ATTN: Adam Sedgewick, National Institute of Standards and Technology

The American Petroleum Institute (API) is pleased to submit the attached comments to the National Institute of Standards and Technology (NIST) on the Preliminary Cybersecurity Framework (Framework). Although a number of these comments were raised during the November 2013 workshop held in Raleigh, North Carolina, we have chosen to reiterate some of those comments and to provide more detailed comments on specific provisions using the template provided in the October 29th Federal Register notice.

We would like to highlight three general issues noted in the attached comment submission:

- 1) The document throughout describes the Categories and Subcategories as “outcomes,” which implies that the action can be completed. As this is not always the case, we recommend use of the term “objectives” rather than “outcomes” as this sets a goal to continuously strive towards. The detailed comments indicate where throughout the document we suggest that this change be incorporate.
- 2) Not all information references are available without cost. To facilitate their use, government should consider purchasing and distributing licenses to make the content available to critical infrastructure. Alternatively, read-only copies of the information references, perhaps through government-sponsored “reading rooms,” could be made available.
- 3) The framework references prioritization through risk management, but provides no guidance as to what constitutes a rational approach to risk management. The framework should link to guidance as to how to effectively implement risk management because a poor risk management program will likely result in insufficient security and critical infrastructure at risk.

We appreciate this opportunity to provide follow-up comments to NIST and commend NIST

staff for providing such an open engagement process throughout the Framework development process. We look forward to continuing to collaborate on the Framework as companies move forward with implementation and adoption.

Do not hesitate to contact me if you have any follow-up questions.

Sincerely,

Walt Retzsch

Walter C. Retzsch

Senior Policy Advisor – International & Cybersecurity
Tax & Accounting Policy Department
American Petroleum Institute



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