RE: Experience with the Framework for Improving Critical Infrastructure Cybersecurity - Comments from The Open Group Staff on the Cybersecurity Framework Roadmap

To Whom It May Concern:

The Open Group Trusted Technology Forum members have decided not to provide a consensus opinion on behalf of the OTTF, but instead to simply submit comments directly from their organizations. Therefore, I am pleased to respond on behalf of The Open Group staff to this RFI.

Comment on the Cybersecurity Framework Roadmap:

Per your request for information on the NIST website:
"NIST published a Roadmap [6] in February 2014 detailing some issues and challenges that should be addressed in order to improve future versions of the Framework. Information is sought to answer the following questions:
1. Does the Roadmap identify the most important cybersecurity areas to be addressed in the future?
2. Are key cybersecurity issues and opportunities missing that should be considered as priorities, and if so, what are they and why do they merit special attention?
3. Have there been significant developments—in the United States or elsewhere—in any of these areas since the Roadmap was published that NIST should be aware of and take into account as it works to advance the usefulness of the Framework?"

The Following Comment is in Response to #3 above:

Since publishing the Framework and the Roadmap, the following significant developments have occurred in the supply chain standards arena, therefore we suggest, for your consideration, that a brief description of the O-TTPS in Section 4.8 of the Roadmap as a referenced standard in supply chain be provided in that section.

Significant Developments:

- The Open Trusted Technology Provider™ Standard (O-TTPS) – Mitigating Maliciously Tainted and Counterfeit Products is a set of best practices for COTS ICT providers that address product integrity and supply chain security throughout a product's life cycle (from design through disposal, both in-house and out-sourced) including the supply chain. The standard is freely available from The Open Group. It was first published in February 2013 and V1.1 was published in July 2014 and is available here: https://www2.opengroup.org/ogsys/catalog/C147.

- There is also an O-TTPS Accreditation Program, which was formally launched in February of 2014. The program enables any technology provider of COTS ICT (e.g. OEM: product provider or hardware or software component supplier, integrator or value-add reseller, distributor or non-value-add reseller) who conforms to the standard to be accredited - positioning them on the pubic accreditation registry so they can be identified as an Open Trusted Technology Provider™. The O-TTPS Accreditation Program web-site can be accessed here: http://ottps-accred.opengroup.org/home-public.

- The Open Group has also submitted a request to ISO/IEC JTC1 to approve the O-TTPS standard as a Publically Available Specification (PAS) submission to ISO.

Thank you for your consideration.

Sincerely,

… Sally Long, Forum Director, The Open Group Trusted Technology Forum – on behalf of The Open Group Staff.