

From: **Noguchi, Kazuo**

Date: Mon, Apr 10, 2017 at 11:03 AM

Subject: Comments on Cybersecurity Framework Draft Version 1.1

To: "[cyberframework@nist.gov](mailto:cyberframework@nist.gov)" <[cyberframework@nist.gov](mailto:cyberframework@nist.gov)>

Dear Sir/Madam,

Thank you for organizing to invite the feedback comments for Cybersecurity Framework Draft Version 1.1. Here are some comments that I have after reading through the Draft and discussed with some colleagues. Particularly, the comments are from the international perspectives of the Cybersecurity.

First of all, the introduction of the supply chain and risk management into the Framework are quite helpful for large global organization. Having said that, the topics of international dimensions can be addressed more in the Framework. More specifically:

- 1) Supply Chain is global in nature, i.e. the sourced parts of the software and hardware are from many countries which have different jurisdictions of nation-states. Thus, the legal framework depends on the individual nation-states in order for large international companies to operate through international supply chain. It is possible that the vulnerability holes are the gaps among nation-state legal frameworks.
- 2) Large organizations are leveraging Open Source Software, Cloud, Fog, Artificial Intelligence, Internet of Things, Sensors, and connected Critical Infrastructure which have different facets of risks and vulnerabilities so that emerging risk management and recovery need to be addressed for entire organization. Again, there are sourced in global in nature, which are emerging and adopted quickly.
- 3) Treatments of Privacy level, PII, data category and classification level are different among nations or regions like EU, so that the differences or gaps are the residual risks for international corporations. It implies the additional legal costs with the risk to fill in the gaps or to bear multiple compliance costs for large international organizations.

I was wondering these can fit in this version 1.1 or future Roadmap considerations, but these are some facets of the business realities. Humbly hope these are food of thoughts for discussions.

Best regards,

Kazuo

\*\*\*\*\*

Kazuo Noguchi

野口和男