

From: Jenkins, Maria O.
Sent: Thursday, January 18, 2018 2:50 PM
To: cyberframework <cyberframework@nist.gov>
Subject: Draft Framework for Critical Infrastructure Comments

Good afternoon,

Attached are the comments from the Defense Contract Management Agency (DCMA) for NIST Draft "Framework for Critical Infrastructure."

Thank you for your support.

Very Respectfully,
Maria Jenkins
Senior Policy Analyst, NSSPLUS
DCMA Cybersecurity

[Attachment copied below]

#	Organization Name	Submitted By	Type*	Section / Page / Req / Line #	Comment (Include rationale for comment)	Suggested change
1	DCMAIT-K	Jenkins		Lines 12-16	Hypertext links are not set up properly.	Fix or remove hyperlink attributes.
2	DCMAIT-K	Jenkins		Line 25 (Table)	Introduce acronym "IR". First use.	
3	DCMAIT-K	Jenkins		Line 80	Spell out acronym "EO". First use.	
4	DCMAIT-K	Jenkins		Footnote 1	Link returns "404 Page Not Found" error.	Correct link: https://www.congress.gov/bill/113th-congress/senate-bill/1353/text?q=%7B%22search%22%3A%5B%22S.1353%22%5D%7D&r=1&overview=closed
5	DCMAIT-K	Jenkins		Footnote 2	Link returns "404 Page Not Found" error.	Correct link: https://www.congress.gov/bill/113th-congress/senate-bill/1353/text?q=%7B%22search%22%3A%5B%22S.1353%22%5D%7D&r=1&overview=closed
6	DCMAIT-K	Jenkins		Footnote 4	Spell out acronym "DHS". First use.	
7	DCMAIT-K	Jenkins		Footnote 5	Use hyperlink format for consistency (blue highlight & underline).	Fix or remove hyperlink attributes.
8	DCMAIT-K	Jenkins		Line 171	Replace "support" with "supports". Subject/verb tense.	
9	DCMAIT-K	Jenkins		Line 207	Hypertext link is not set up properly.	Fix or remove hyperlink attributes.
10	DCMAIT-K	Jenkins		Line 218	Hypertext link is not set up properly.	Fix or remove hyperlink attributes.
11	DCMAIT-K	Jenkins		Line 228	Hypertext link is not set up properly.	Fix or remove hyperlink attributes.
12	DCMAIT-K	Jenkins		Line 260	Spell out acronym "IEC". First use.	
13	DCMAIT-K	Jenkins		Lines 265-274	Hypertext links are not set up properly.	Fix or remove hyperlink attributes.
14	DCMAIT-K	Jenkins		Footnote 9	Link returns "404 Page Not Found" error.	Correct link: https://energy.gov/sites/prod/files/FRN%20Notice%20of%20Publication%20of%20Cybersecurity%20Risk%20Management%20Proc

						ess%20Guidelines%20-%20May%2023%2C%202012.pdf
15	DCMAIT-K	Jenkins		Line 319	Hypertext link is not set up properly.	Fix or remove hyperlink attributes.
16	DCMAIT-K	Jenkins		Footnote 10	Recommend updating to new link.	Current link is still valid but redirects to: https://www.nist.gov/cybersecurity-framework
17	DCMAIT-K	Jenkins		Line 431	Italicize "External Participation" to maintain consistency within document.	
18	DCMAIT-K	Jenkins		Footnote 12	Delete duplicate link.	
19	DCMAIT-K	Jenkins		Line 661	Introduce acronym "OT". First use.	
20	DCMAIT-K	Jenkins		Line 714	Hypertext link is not set up properly.	Fix or remove hyperlink attributes.
21	DCMAIT-K	Jenkins		Lines 718-744	Recommend adding punctuation at end of each bulleted sentence for consistency.	
22	DCMAIT-K	Jenkins		Line 755	Replace "Suppliers" and "Buyers" with "suppliers" and "buyers".	
23	DCMAIT-K	Jenkins		Line 773	Insert blank line prior to start of next paragraph. Consistency.	
24	DCMAIT-K	Jenkins		Line 785	Insert "the" before likelihood to read "the likelihood". Improves comprehension.	
25	DCMAIT-K	Jenkins		Line 816	Recommend updating to new link.	Current link is still valid but redirects to: https://www.nist.gov/cybersecurity-framework
26	DCMAIT-K	Jenkins		ID.RM-3	Replace "informed" with "learned" or "formed". Improves comprehension.	
27	DCMAIT-K	Jenkins		Appendix A	ANSI/ISA-62443-2-1 (99.02.01)-2009	Provide correct link or remove. Is this the intended link?

					reference link returns "404 Page Not Found" error.	https://www.isa.org/store/ansi/isa-62443-2-1-990201-2009-security-for-industrial-automation-and-control-systems-establishing-an-industrial-automation-and-control-systems-security-program-/118204
28	DCMAIT-K	Jenkins		Appendix A	ISO/IEC 27001 reference: recommend updating to new link.	Current link is still valid but redirects to: https://www.iso.org/standard/54534.html
29	DCMAIT-K	Jenkins		Appendix A	Introduce acronym "ISA". First use.	
30	DCMAIT-K	Jenkins		Appendix C	Delete SCADA	
				Roadmap 4.2, Page 6, Bullet 4	Use acronyms only.	Introduced earlier.
				throughout	Replace "supply chain risk management" with acronym "SCRM" for each instance after introduction.	Introduced earlier.
				Page 6, Section 4.3	Remove semicolon after practitioners.	Grammar.
				Page 9, Section 4.5, Bullet 2	Superscript footnote number 25.	Formatting.
				Page 9, Section 4.5, Bullet 4	Superscript footnote number 27.	Formatting.
				Page 10, Section 4.6	Replace "enable" with "enables" to read, "enables easy translation..."	Grammar.
				Page 11, Section 4.6	Introduce acronym ERM.	First use.
				Page 11, Section 4.6	Remove quotes from C-suite.	Formatting.
				Page 12, Section 4.7	Fix font on 81. Also 81 what? 81 percent? 81 breaches studied?	

					Include source of quote.	
				Page 12, Section 4.7	Superscript footnote 35.	
				Page 12, Section 4.7	Use acronym NCCoE.	Introduced earlier.
				Page 13, Section 4.7	Spell out IoT.	First use.
				Page 14, Section 4.9	Insert blank line before section.	Formatting.
				Page 15, Section 4.9	Un-italicize superscript on footnote number 38.	Formatting.
				Page 16, Section 4.10	Place footnotes after each document vice end of sentence.	Improves comprehension.