From: Daniel Neuberger
Sent: Friday, March 3, 2023 12:30 PM
To: cyberframework <cyberframework@nist.gov>
Subject: NIST CSF 2.0 Concept Paper Feedback

Hello,

I am providing feedback on https://www.nist.gov/system/files/documents/2023/01/19/CSF_2.0_Concept_Paper_01-18-23.pdf [nist.gov]. My suggestions are:

1. Please consider incorporating the ideas from the OWASP Cyber Defense matrix (https://owasp.org/www-project-cyber-defense-matrix/ [gcc02.safelinks.protection.outlook.com]) including the associated website and book. It addresses many shortcomings and inconsistences of CSF 1.1 (the book in particular highlights specific issues). Furthermore, it is conceptually simple, but very powerful making it easier to use and get traction with others.

2. I don't think governance should be added as a separate function because it applies across all the functions. The Cyber Defense Matrix represents this as "Process" at the bottom of the matrix applying equally across all functions. Chapter 5 of the book describes how this all fits together in terms of development and implement a cyber security roadmap. It's also something we're discussing in more detail within the community.

3. I would also consider how to use the Cyber Defense Matrix concepts for cybersecurity measurement and assessment. I think both of these also apply across all functions and I've found the matrix to be a useful strategic level framework for both of these aspects. The book addresses these as well.

Myself and I'm sure others in the Cyber Defense Matrix community including the creator are willing to engage further on these points.

Thanks.

- Daniel

Daniel Neuberger | CTO

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