From: Owen Ambur
Sent: Thursday, August 27, 2015 12:16 AM
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Cc: Betsy Fanning
Subject: NISTIR 8074 Volume 1 (Draft) & StratML

Consistent with E.O. 13462 and the spirit of section 10 of the GPRA Modernization Act (GPRAMA), the objectives outlined in NIST's draft cybersecurity standards engagement report are now available in open, standard (ISO 17469-1) format at http://xml.fido.gov/stratml/drybridge/index.htm#EIS2AC or, more specifically, http://xml.fido.gov/stratml/carmel/iso/EIS2ACwStyle.xml

These objectives are closely related to the purposes of the StratML standard:

> **Objective 1.1: Inventory -** Ensure there is a sufficient inventory of international standards that can serve as a basis for the cybersecurity and resiliency of U.S. organizations, particularly critical infrastructure.

It would be helpful if the purposes, stakeholders, and relationships among standard were documented in StratML Part 2, Performance Plan/Report, format so that the inventory could automatically be aggregated and maintained, on a widely distributed basis.

> **Objective 2.4: Assessment Tools -** Support the development and use of associated assessment tools (e.g., reference implementations, conformance and interoperability test suites) to complement timely, technically-sound standards development.

The data gathered in such tools should be shared, analyzed, and reported in an open, standard, machine-readable format like StratML Part 2.

> **Objective 3.1: Standards & Assessments -** Support the development and use of international standards and associated assessment schemes for cybersecurity (where relevant, effective, and appropriate), which can promote international trade and provide a level playing field for U.S. companies.

StratML Part 1, Strategic Plans, is such an international standard (ISO 17469-1) and Part 2 (ANSI/AIIM 22:2009) is on track for adoption as an international standard as well. Part 2 facilitates the assessment of the degrees to which target results are being achieve in terms of actual results.

> **Objective 4.1: Collaboration -** Support the development and use of international standards in collaboration with U.S. industry, to foster open and fair competition.

Collaboration should center on the achievement of common and complementary objectives. Facilitating collaboration is among the primary purposes of the StratML standard.

> **Objective 4.3: Performance Standards -** Encourage the development and use of performance standards for cybersecurity, where appropriate.

Such standard should be published in an open, standard, machine-readable format like StratML Part 2, Performance Plans and Reports.

I hope these comments are helpful. If you have any questions about the StratML standard, I will be happy to answer them.

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