From: <Evans>, Ken <KEvans@cssc.com>
Date: Thursday, April 4, 2013 4:17 PM
To: cyberframework <cyberframework@nist.gov>
Subject: Developing a Framework to Improve Critical Infrastructure Cybersecurity

Ms. Honeycutt,

My name is Ken Evans (CISSP, GSEC) and I am the Sr. VP of Information Technologies at Consulting Services Support Corporation, a financial consulting firm, FINRA Broker / Dealer, and SEC Registered Investment Advisory firm. As the head of the information security program for our small company I have had trouble in the past sorting through the noise and clearly understanding the threats against our organization. As I began to search for solutions I looked at frameworks like ISO 27002, NIST 800-53, and even ITIL and Cobit. All of these seemed like very tall mountains to climb for a small organization, and still left open the question of what the priorities should be.

When I discovered the Critical Security Controls (formerly the SANS Top 20 Critical Security Controls) it was as if a light bulb was suddenly illuminated in a dark room. For the first time we had a chance to follow an achievable roadmap built by the consensus of several government agencies and industry leaders. These controls immediately helped us focus on what many well informed, experienced information security professionals identified as the most serious threats, thereby helping us to make the most of our limited resources. This was a huge breakthrough for our small team, and one that we believe in so much that we are starting to evangelize to our own clients. In addition, the Critical Security Controls maps well to other standards like NIST 800-53, should we choose to pursue those later, so no effort is wasted.

I think that it is important for government to lead with the creation and endorsement of a framework that not only works for government entities, but that small and medium business can grasp, understand, and actually have a chance to implement. I strongly recommend that the Executive Order team adopt the Critical Controls as its recommended framework, as many of us who have already seen tangible results have done.

Best Regards,

Ken Evans
Sr. VP of Information Technologies
CISSP, GSEC

Consulting Services Support Corporation
755 W Big Beaver Rd, Ste 2000
Troy, MI 48084
248-244-7980