



Charles Blauner
Global Head of
Information Security

Tel: (908) 563-3589
Email: charles.blauner@citi.com

April 8, 2013

Ms. Diane Honeycutt
The National Institute of Standards and Technology
100 Bureau Drive, Stop 8930
Gaithersburg, MD 20899

Developing a Framework to Improve Infrastructure Cybersecurity

Dear Ms. Honeycutt:

Citi appreciates the opportunity to provide comments in response to the request for information by the National Institute of Standards and Technology (“NIST”) to assist in developing a framework to reduce cybersecurity risks to critical infrastructure (“Cybersecurity Framework” or “Framework”).¹

Citi endorses the position and comments submitted by The Financial Services Sector Coordinating Council (FSSCC). Citi shares the Administration’s concerns regarding cyber threats, and is deeply committed to protecting our infrastructure and partnering with public and private entities as envisioned by the Cybersecurity Framework.

As stated by FSSCC, our sector should serve as a model for Framework development, and the cybersecurity requirements already in place in the sector by regulation or sound business practices map closely to NIST and other standards envisioned as part of the Cybersecurity Framework. We also believe that the dynamic processes in place within the financial sector’s regulatory agencies to amend cybersecurity regulatory requirements, as well as within financial institutions to amend practices as cyber threats change, conform to the risk-based approach the Cybersecurity Framework recommends.

We again thank NIST and applaud its efforts to develop a Cybersecurity Framework to improve our nation’s cybersecurity environment.

Respectfully submitted,

Charles Blauner
Global Head of Information Security
Citigroup, Inc.

¹ 78 Federal Register 13,024 (Feb. 26, 2013).