To whom it may concern,

I would like to provide feedback on the NIST CSF 2.0 draft from August 8th, 2023, specifically on the categorization of PR.DS-11 reading: "Backups of data are created, protected, maintained and tested".

I believe that this item is miscategorized under "Protect" and should be moved to "Recover".
My reasoning is as follows: Backups do not intrinsically provide any protection as they do not limit or contain any cybersecurity event, since they do not make it harder for attackers or disasters to destroy the primary copy of the data.
The main function of backups is to provide the ability to recover lost data, as such they are a critical technical capability of any recovery strategy.
I would therefore argue that readers of the CSF would expect to find that subcategory under the "Recover" function and that the current categorization creates a slight logical dissonance.

Best regards,

Ludwig Seitz

PS: Note that the above does not necessarily reflect the opinions of my employer. I'm submitting this feedback as private person with a cybersecurity background.

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Ludwig Seitz
OT Security Specialist

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