COMMENTS MATRIX FOR NIST CSF 2.0								
Commenter Area								
#	ORGANIZATION & POC Name, Phone, and E-mail	Line Number	Page	Para	Comment Type	Comments and Justification	Resolution	A/R/P

HOW TO USE THE NASCTN COMMENT MATRIX if you are the coordinating organization:

Use this form to provide comments to NASCTN. Complete the header and footer, columns 2-7:

Column 1	Number the comments sequentially as they are added by each contributor.
Column 2	Enter the Organization, name, phone number, and email address for each contributor
Columns 3, 4, & 5	Enter the appropriate information for each comment. Leave columns 4 & 5 blank for general comments that apply to the entire document.
Column 6	Enter comment type (C, S, or A). (C) Critical: Critical comments apply to situations where the document violates established policy, guidance, or directives. The justification for critical comments MUST identify violations of law or contradictions of Executive Branch or Federal Agency policy; unnecessary risks to safety, life, limb, or materiel; waste or abuse of appropriations; or imposition of an unreasonable burden on an organization's resources. (S) Substantive: Make a substantive comment if a part of the document seems unnecessary, incorrect, misleading, confusing, or inconsistent with other sections, or if you disagree with the proposed responsibilities, requirements, or procedures. (A) Administrative: An administrative comment concerns non-substantive aspects of an issuance, such as dates of reference, organizational symbols, format, and grammar.
Column 7	Place only one comment per row. Enter your comment, recommended changes, and justification in the area provided. If any material is sensitive, proprietary, or requires special handing, contact the NASCTN Program Manager for guidance on marking and handling the comment matrix.

NASCTN Adjudication

Consolidate comments from all contributors and adjudicate them. Remove column 2 to maintain anonymity of contributors prior to posting to the NASCTN portal page (**https://www.nist.gov/ctl/national-advanced-spectrum-and-communications-test-network-nasctn**). Set header and footer as appropriate. Complete information in column 8 & 9:

Column 8	If you rejected or partially accepted a comment, enter your resolution and/or justification. Leave blank if you accepted it. Include any related communications with the contributing organization. You MUST provide convincing support for rejecting critical comments.
Column 9	Enter whether you accepted (A), rejected (R), or partially accepted (P) the comment. Your justification in column 8 must be consistent with this entry.

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	Ubicquia, Kenneth Abbott, [redacted]	70	1	1	S	The term “fundamental type of risk” is not defined, nor a reference provided for said definition.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	N/A	N/A	N/A	S	There needs to be a visualization of the outcome integration “lifecycle”.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	N/A	N/A	N/A	C	Document must speak to materiality of an incident.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	72-73	1	1	S	While listing out what cybersecurity risks can threaten; risk to intellectual property and regulator risk with associated fines.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	154	3	3	S	Currently reads “to guide their cybersecurity-related decisions.” Should read “to guide their cybersecurity-related analysis, actions or decisions”		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	192-193	5	4	S	Initial sentence reads “Establish and monitor the organization’s cybersecurity risk management strategy, expectations, and policy.” Need to include what is included later in the paragraph on processes and procedures. For example: “Establish and monitor the organization’s cybersecurity risk management strategy, expectations, process, policy, and procedures.”		Choose an item.
	Ubicquia, Kenneth Abbott,	208-	6	1	S	I would prefer to see training and awareness as a		Choose

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	[redacted]	214				separate function.		an item.
	Ubicquia, Kenneth Abbott, [redacted]	219	6	3	S	You respond to events as well so it should be to cybersecurity incidents and events. With materiality becoming an important part of whether something is classified as an incident, you will want to be broader in definition of what you would respond to.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	219-222	6	3	S	Current wording ignores root cause analysis. Need to speak of isolation of incident as well. It is not addressed in “contain the impact”.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	223	6	4	C	Information and confidence should be included along with assets and operations.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	N/A	N/A	N/A	S	Language is inconsistent throughout. Are these supposed to be outcomes or controls/processes. It is obviously supposed to describe an outcome, but this has not been achieved.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	278	8	1	S	As an example of the above. Nothing in this paragraph speaks to outcomes.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	361 & 362	11	1	A	Current language states “Those who” and “The individuals who”. Should speak instead to “The roles that”.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	415	12	2	S	There is reference to outcomes for Business Partner or supplier. For a typical organization you do not		Choose an item.

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	[redacted]					have the wherewithal to influence these. This makes the document written as if everyone implementing it is either a government entity or extremely large enterprise. Recommend explaining how to leverage external audits to assess whether the risk as rated against the wanted outcome is acceptable.		
	Ubicquia, Kenneth Abbott, [redacted]	482-487	14	4	A	Section 3.4 seems incomplete as if the writer forgot to finish an initial draft.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	536 * 548	16	3	A	There is no need for the bullet on line 548 as it is encompassed by bullet on line 536.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	602	17	3	S	Under “Respond” I would like to see the end defined. Specifically, where does “Respond” end and “Recover” begin.		Choose an item.
	Ubicquia, Kenneth Abbott, [redacted]	N/A	26	N/A	C	Tiers are not reflective of reality. Most organizations will not fit into these. Need a more nuanced approach.		Choose an item.