# Response to Request for Comment (RFC) on NIST CSF Draft version 2.0

## Simplification of Language in NIST Publication for Easier Translation into More Complex Languages

## Summary

This Response to the Request for Comment (RFC) for the CSF draft proposes that the National Institute of Standards and Technology (NIST) adopt a policy of using simplified English for this cyber publication. Simplifying the English language used in this document will make it more accessible to non-native English speakers and facilitate easier translation into languages that have more complex grammatical structures, such as Greek.

## Background

The role of NIST in setting standards and guidelines is crucial to various sectors, from technology to healthcare. As the impact of NIST's work is global, it is expected that the NIST CSF in version 2.0 will be translated into multiple languages. Some languages, like Greek, have more complex grammatical structures, including numerous tenses and moods, which make translation more difficult and time-consuming.

As an example, and similar to many other languages that the NIST CSF v1.1 has been translated, Greek has a more complex grammar system than English, with three genders, four cases, and three numbers (singular, dual, and plural), compared to English's two genders, one case, and two numbers (singular and plural). Greek has a different sentence structure than English, with the verb typically placed at the end of the sentence.

## Problem Statement

The current level of complexity in the language used the next NIST CSF v2.0 publication can serve as a barrier to understanding and implementing it. It also poses challenges for accurate translation into languages with more complex grammar than that of the English language.

Specifically, translators of the NIST CSF v2.0 are likely to face problems in the following areas:

- Accessibility: Complex sentence structures and technical jargon can limit the accessibility of NIST publications to experts, thereby reducing the reach and impact of the work.

- Translation Accuracy: When translating into languages with more complex grammatical rules, the potential for misinterpretation or errors increases.

- Efficiency: Complex language requires more time and resources to translate, slowing down the dissemination of critical guidelines and standards.

## Proposal

We propose that NIST adopts the following guidelines for using simplified English in the NIST CSF v2.0:

- Shorten Sentences: Aim for sentences that are no longer than 20-25 words.
- Use Active Voice: Utilize the active voice to make sentences clearer and more direct.
- Simpler Syntax: Use simpler sentence structures to convey ideas clearly and concisely.

## Benefits

We predict that this will likely provide wider accessibility to the document. It will be easier to understand documents will be more accessible to a broader audience, including non-experts and those for whom English is a second language.

Furthermore, the document will be easier to translate. The simpler language will facilitate quicker and more accurate translations into complex languages, thus expediting the dissemination of the CSF in version 2.0.

Finally, it will be more cost-effective to engage in translation work. The reduced complexity in language will also reduce translation costs and time.

## Conclusion

Adopting simpler English grammar and language in the NIST v2.0 publication is an effective way to make these documents more accessible and easier to translate into languages with more complex grammatical structures, such as Greek. This will, in turn, enhance the global impact of NIST's work.

We request NIST to consider this proposal and look forward to engaging in further discussions to facilitate its implementation.