

From: [Ray Tramosch](#)
To: [cyberframework](#)
Subject: NIST 2.0 CSF comments
Date: Monday, September 25, 2023 5:31:28 PM

Hello! In reviewing the new 2.0 I have one comment to pass along, for what it's worth. I make this comment based on my extensive usage of NIST products over 25 years in DoD cybersecurity, the current CSF usage in my work at MITRE supporting DoD as well as in my role as a cybersecurity adjunct professor with UNH. In our UNH program we focus extensively on the usage of CSF, 800-53 and CIS as basing documents for cybersecurity policy.

I am disappointed to see the apparent removal of the informative references in the CSF 1.1 Table 2 (now table 5). My experience is the former structure of categories, sub categories and IRs was probably the best "one stop shop" for students and practitioners to use to understand a function as well as quick jump to other relevant guidance to "dive deeper". I do note you state they will be maintained in the CPRT but I fear in practice that extra step will make this current document less valuable. (I also tried to find them during this review and was unable to find anything of use)

I do believe the addition of governance as an overarching, binding function is a big plus to this construct!

Thanks in advance for your time!

Vr,

Raymond (Ray) Tramosch

Lead Cyber Resiliency Engineer
N221 – Acquisition Studies and Analysis
OSD Division



MITRE | Solving Problems for a Safer World (R)