November 2, 2023

National Institute of Standards and Technology
100 Bureau Drive
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Email: cyberframework@nist.gov

Re: Comments on the Public Draft of NIST CSF 2.0

Fortinet, Inc. ("Fortinet")[1] respectfully submits these comments in response to the National Institute of Standards and Technology's ("NIST's") public draft of the NIST Cybersecurity Framework ("CSF") 2.0 released August 8, 2023.[2] Fortinet applauds NIST's ongoing commitment to soliciting feedback to inform final development of CSF 2.0 and offers the following in the spirit of our previous comments on the CSF 2.0 concept paper submitted on March 15, 2023.

Background

Founded in 2000, Fortinet is a US-based developer of novel and next generation security and networking solutions and architectures. Holding more than 1,250 patents, Fortinet is the most innovative provider of cybersecurity and is focused on protecting the breadth of the digital attack surface from edge to core to cloud. Fortinet leverages analytic expertise, artificial intelligence, and machine learning systems to analyze security telemetry to protect against ransomware, malware, and other threats. Fortinet secures over half a million enterprises, service providers, and government organizations around the world. As a company that provides cybersecurity to a broad range of organizations across all sectors of the economy, we offer the following comment.

Govern Function

Fortinet applauds the continued maturation of NIST Cybersecurity Framework 2.0. The new Govern (GV) function is well explained. Its placement as the first item on the list of CSF

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[1] Fortinet, Inc. (NASDAQ: FTNT) is a US-based developer of custom cybersecurity solutions that assists governments, service providers, and hundreds of thousands of businesses around the world to secure their networks and drive digital innovation. For more information, see www.fortinet.com.

[2] *Public Draft: The NIST Cybersecurity Framework 2.0*, National Institute of Standards and Technology, August 8, 2023, https://nvlpubs nist.gov/nistpubs/CSWP/NIST.CSWP.29.ipd.pdf

functions and its depiction graphically as an inner ring touching all five other functions helps to demonstrate the unifying role of governance in cyber risk management. We encourage NIST to ensure this characterization of the Govern function's role and profile among the other functions is retained in the final draft.

Audience

Fortinet appreciates the draft's focus on a broad audience of users involved in managing risk.[3] We partner with companies of all sizes to protect their networks and data, including small and medium sized businesses, and see firsthand the appetite for more guidance on best practices. We suggest additional materials would be helpful to a first-time user or those employees focusing on managing cyber risk while also serving other functions in their business.

Illustrative Templates

One way to further support new users is to provide additional illustrative material such as exemplar Profile templates to help new users begin to apply the CSF. When reading the document from the perspective of a first-time user, we believe additional material to help new users get started would be useful. Given CSF 2.0's Section 3 discussion of organization-specific profiles as a way to start using the CSF, we believe that providing notional examples of a populated template would be especially helpful to organizations and users who are starting from scratch. CSF Appendix A provides a blank Profile template, but we believe providing one or more populated samples would help new users, especially those in smaller organizations.

Exemplar templates offer the opportunity to address some of the common questions or concerns such organizations face, such as how to frame the governance function if they lack full time security staff or leadership. Content could be notional or drawn from actual existing profiles, which CSF 2.0 mentions as a viable alternative to creating a profile from scratch. This material could be incorporated into the Quick Start Guide (SP 1271) or accessed via a link in the CSF text to content in the online tools and resources that NIST has indicated it will update more frequently than the CSF itself.

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[3] *Public Draft: The NIST Cybersecurity Framework 2.0 at* 3 (Section 1.1).

Conclusion

NIST's CSF 2.0 will build on the momentum and broad success the CSF has developed since its inception as a US Government-focused framework in 2014. Fortinet supports NIST's efforts to reflect its growing importance by make substantial changes with CSF 2.0 to ensuring it reflects the evolving cybersecurity landscape. We appreciate this opportunity to provide our input and we look forward to working with NIST and other stakeholders to help create implementation material for CSF 2.0.

Respectfully submitted,

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Fortinet, Inc.