Submitted by:	Brian Cronin
Date:	12/7/2013

#	Organization	Commentor	Туре	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	SUNY-WCC Cybersecurity Program	Brian Cronin	G/T	1	All	1	The name 'Framework' is too generic and should be renamed to 'CyberFramework' since it is dealing with cybersecurity.	change 'Framework' to 'CyberFramework' throughout the document.
2	SUNY-WCC Cybersecurity Program	Brian Cronin	G/T	1	82	1	Should include that cyber attacks change over time and the use of the cyberframework will change also.	Because each organization's risk is unique, along with its use of IT and ICS, and because cyberattacks change over time, the implementation of the CyberFramework will vary accordingly.
3	SUNY-WCC Cybersecurity Program	Brian Cronin	G/T	2	118	1	The cyberframework core terminology should be the same as what all information security professionals are taught in colleges and universities throughout the United States to use to reference the security planning process today. This refers to using the six phases (Identify Assets, Identify Risks, Create Policies, Implement, Monitor, Recover from an incident) of the security process when discussing cyber security issues. This is a fundamental rule that should be carried throughout the entire document including modifying all artwork and illustrations.	The CyberFramework Core consists of six Catagories - Identify Assets, Identify Risks, Create Policies, Implement, Monitor, Recover from an incident -
	SUNY-WCC Cybersecurity Program	Brian Cronin	G/T	3	210	2.1	The Functions, Categories, Subcategories should be renamed to better indicate their structure in a business environment.	Rename Functions to Categories, Rename Categories to Modules, Rename Subcategories to SubModules and leave Informative References as is.
5.	SUNY-WCC Cybersecurity Program	Brian Cronin	G/T	5	216	2.1	Renamed Functions to Categories because businesses and their employees will understand 'Categories' but not 'Functions'. Functions are something that a computer program has.	Categories organize basic cybersecurity activities at their highest level. These Categories include the six phases of the security process: Identify Assets, Identify Risks, Create Policies, Implementation, Monitor and Recover from an incident. The categories aid in communication
	SUNY-WCC Cybersecurity Program	Brian Cronin	G/T	6	224-226	2.1	Explain what Modules are so that businesses and employees will understand.	Modules are the subdivisions of a Category into groups of cybersecurity outcomes, closely tied to cyber security needs and particular activities. Examples of Modules include: Asset Management, Access Controls and Detection Processes.

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SUNY-WCC Cybersecurity 7 Program	Brian Cronin	G/T	6 227-231	1 2.1	Explain what SubModules are so that businesses and employees will understand.	SubModules further subdivide a Module into higher-level outcomes, but are not intended to be a comprehensive set of practices to support a module. Examples of SubModules include: Cataloging physical devices and systems within the organization, Databases are protected and notifications from the detection system are investigated.
SUNY-WCC Cybersecurity 8 Program	Brian Cronin	G/T	6 232-237	7 2.1	To longwinded, Explain what the Informative References section is, so that businesses and employees will easily understand it.	Informative References are links to specific sections of standards, guidelines and common practices that illustrate a method to accomplish the activities associated within each SubModule.
SUNY-WCC Cybersecurity 9 Program	Brian Cronin	G/T	6 24	2 2.1	Change to core categories	The six CyberFramework Core Categories defind below apply to both IT and ICS.
SUNY-WCC Cybersecurity 10 Program	Brian Cronin	G/T	243- 6 244	2.1	Explain 'Identify Risks'	Identify Risks – Develop the institutional understanding to manage cybersecurity risks to organizational systems, assets, data and capabilities.
SUNY-WCC Cybersecurity 11 Program	Brian Cronin	G/T	245- 6 251		Explain 'Identify Risks'	The Identify Category includes the following SubCategories of outcomes: Asset Management, Business Environment, Governance, Risk Assessment and Risk Management Strategy. Understanding the business context, the resources that support the critical IT infrastructure and the related current cybersecurity threats, helps to enable an organization to focus its efforts and resources towards positive results.
SUNY-WCC	Brian Civilli	U/ I		2.1	Explain Identity (Clores	Create Policies – Develop policies using
Cybersecurity 12 Program	Brian Cronin	G/T	252- 6 254	2.1	Explain 'Create Policies'	appropriate safeguards to ensure the delivery of critical infrastructure services.

								Implementation – implement policies and
								safeguards that protect the assets. The
								Implementation Category includes the
								following Modules of outcomes: Access
								Control, Awareness and Training, Data
								Security, Protective Technology and
								Information Protection Processes /
								Procedures. The Protective activities are
	SUNY-WCC							performed consistent with the organization's
	Cybersecurity				255-			risk strategy defined in the Identify Risk
13	Program	Brian Cronin	G/T	7	258	2.1	Add 'Implementation' section and explain	, ,
							Change 'Detect' heading to 'Monitor'	
							because the cyberframework core should	
	SUNY-WCC						be the same as the six phases in the	
	Cybersecurity						security process that all information	
14	Program	Brian Cronin	G/T	7	259	2.1	security professionals reference today.	Change 'Detect' to Monitor'
								Develop and implement the appropriate
								activities prioritized through the
								organization's effective planning and risk
								management process to identify the
								occurrence and detection of a cybersecurity
							Move the 'Respond' paragraph into the	event. The Monitor elements include the
							'Monitor' Category because this is how it	following modules: Anomalies and Events,
	SUNY-WCC						is handled within the six phases in the	Response Planning, Analysis, Mitigation,
	Cybersecurity				261-		security process that all information	Improvements, Security Continuous
15	Program	Brian Cronin	G/T	7	272	2.1	security professionals reference today.	Monitoring and Detection Processes.

								Recover from an incident – Develop and
								implement the appropriate policies and
								procedures, prioritized through the
								organization's risk management process, to
								restore the capabilities or critical
								infrastructure services that were impaired
								through a cybersecurity event.
								The Recover from an incident category
								includes the following Modules: Recovery
								Planning, Improvements and
								Communications. The activities performed
								in the Recover from an incident category are
								performed consistent with the business
								context and risk strategy defined in the
							Change 'Recover' to 'Recover from an	Identify Risks Category. The activities in the Recover from an incident Category support
							incident' because this is how it is handled	timely recovery to normal operations to
	SUNY-WCC						within the 'six phases in the security	reduce the impact from a cybersecurity
	Cybersecurity				273-		process' that all information security	event.
16	Program	Brian Cronin	G/T		280	2.1	professional reference today.	O TOTAL
								The Profile is the alignment of the
								Categories, Modules, SubModules, industry
								standards and a best practice which takes
								into account the business requirements, risk
								tolerance and the financial resources of the
								organization. Identifying the gaps between
							Reworked the last paragraph of the	the organizations current profile and its
	SUNY-WCC				202		Framework Profile to be current with the	goals, allows the creation of a prioritized
1.5	Cybersecurity	Drian Cranin	G/T		292- 298	2.2	Categories, Modules and SubModules	roadmap that the organization will
1/	Program	Brian Cronin	G/ I	/	∠9 8	2.2	sections.	implement to reduce its cybersecurity risks. growth. However, the functioning of the
								critical infrastructure has become dependent
	SUNY-WCC						change 'these enabling' technologies to	on insecure technologies, spurring
	Cybersecurity				600-		'insecure' technologies because these	governments around the globe to view
1 18	Program	Brian Cronin	G/T		601		technologies are inherently insecure.	cybersecurity increasingly

	1	T				1			Organizations. As many organizations and
									, , ,
									corporations operate globally or rely on the
									interconnections of the global digital
									infrastructure, many of the requirements are
									affecting or may affect how organizations
									operate and conduct business. Diverse and
									unique business requirements and
									constraints can impede interoperability,
									produce duplication, harm cybersecurity and
									hinder innovation, thus significantly
									reducing the availability and use of
									innovative technologies to critical
									infrastructures in all industries. This
									ultimately hampers the ability of critical
									businesses and organizations to operate
									globally and to effectively manage new
									technology and the evolving risks of such
									technologies. The CyberFramework is
								Changes to the International Aspects,	designed to create international standards
	SUNY-WCC							Impacts, and Alignment seciton to focus	that can be scaled to any size organization or
	Cybersecurity				604-			more on how the CyberFramework can	business to help manage and eliminate
1	9 Program	Brian Cronin		38	612	c.6		help the corporation and business.	cybersecurity risks.
									Enable organizations to review and prioritize
								'optimize target states' does not mean	decisions regarding cybersecurity. The
	SUNY-WCC							anything and the sentence need to be more	CyberFramework utilizes risk assessment to
	Cybersecurity				170-			concise and geared towards business	help organizations select goals for
	0 Program	Brian Cronin	G/T	3	171			needs.	cybersecurity activities.
									Because of these differences, the
	SUNY-WCC							The original sentence is fragmented and	CyberFramework is designed as a risk-based
	Cybersecurity				182-			needs to be more concise and geared	guide, with a goal of providing flexible
2	1 Program	Brian Cronin	G/T	3	183		1.2	towards business needs.	implementations for all business models.