

December 09, 2013

National Institute of Standards and Technology  
Information Technology Laboratory  
100 Bureau Drive, Stop 8930  
Gaithersburg, MD 20899-8930

RE: Preliminary Cybersecurity Framework Comments

Dear Adam Sedgewick,

I am writing on behalf of Xceed Financial Credit Union, which serves over 300 Select Employer Groups nationwide. We have 67 thousand members and 998 million assets under management. Xceed appreciates the opportunity to provide comments to the National Institute of Standards and Technology (NIST) on its Preliminary Cybersecurity Framework.

We found the Preliminary Framework to adequately define outcomes that strengthen cybersecurity and support business objectives. Further the tools for senior executives and boards were very helpful to understand potential risks and how to mitigate them.

It is not clear in the Preliminary Framework if this will be a cost-effective implementation. Currently there are too many informative resources that do not provide clear guidance to enable cost-effective implementation. It would be most beneficial if the suggestions from the resources be unified and simplified into an implementable guide. Based on what is required it might be a burden for smaller institutions to meet the required standard.

While we laud the Preliminary Cybersecurity Framework's goal of securing the nation's infrastructure, we expect the Framework to be a simplified guide towards cybersecurity.

Thank you for the opportunity to comment on the Framework and for considering our views.

Sincerely,

Teresa Freeborn  
CEO  
Xceed Financial FCU

cc: CCUL