#	Organization	Commentor	Type	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	HISP Institute (HISPI)	Taiye Lambo	Major	ALL	ALL	ALL	The 107 Sub Categories only cover 5 of the 20 HISPI Top 20 Mitigating Controls that are based on real world control failures	See more information here https://twitter.com/InsideCyber/status/385728777499578368 and http://www.tripwire.com/state-of-security/regulatory-compliance/cyber-security-framework-murky-cloud-security-issues/
2	HISP Institute (HISPI)	Taiye Lambo	Major	ALL	ALL	ALL	The word cloud is only mentioned twice in the latest NIST CSF draft, and very casually at that. The Functions, Categories, Sub Categories in the latest NIST CSF draft do not specifically call out or even attempt to address cloud related risks.	See more information here http://www.tripwire.com/state-of-security/regulatory-compliance/cyber-security-framework-murky-cloud-security-issues/
3	HISP Institute (HISPI)	Taiye Lambo	Minor	13	466	ID.AM-1	Not all assets are critical and some assets are external such as cloud service provider managed assets	Add "Critical" to the beginning of this sub-category and change "within" to "within and external to"
4	HISP Institute (HISPI)	Taiye Lambo	Minor	13	466	ID.AM-2	Not all assets are critical and some assets are external such as cloud service provider managed assets	Add "Critical" to the beginning of this sub-category and change "within" to "within and external to"
5	HISP Institute (HISPI)	Taiye Lambo	Minor	13	466	Asset Management (AM)	"risk strategy" does not seem to be the appropriate terminology here.	Change "risk strategy" to "risk tolerance / appetite" or "risk management program"
6	HISP Institute (HISPI)	Taiye Lambo	Minor	14	466	Business Environment (BE)	"risk decisions" does not seem to be the appropriate terminology here.	Change "risk decisions" to "risk tolerance / appetite" or "risk management program"
7	HISP Institute (HISPI)	Taiye Lambo	Minor	17	466	PR.AC-2	The need for sub category effectiveness should be stressed	Change "secured" to "secured effectively"
8	HISP Institute (HISPI)	Taiye Lambo	Minor	17	466	PR.AC-3	The need for sub category effectiveness should be stressed	Change "managed" to "managed effectively"
9	HISP Institute (HISPI)	Taiye Lambo	Minor	17	466	PR.AC-4	The need for sub category effectiveness should be stressed	Change "managed" to "managed effectively"
10	HISP Institute (HISPI)	Taiye Lambo	Minor	17	466	PR.AC-5	The need for sub category adequacy should be stressed	Change "protected" to "adequately protected"

11	HISP Institute (HISPI)	Taiye Lambo	Minor	17	466	PR.AT-1	This statement is incomplete	Add "about their roles and responsibilities" to the end of this statement
12	HISP Institute (HISPI)	Taiye Lambo	Minor	18	466	PR.DS-1	The need for sub category adequacy should be stressed	Change "protected" to "adequately protected"
13	HISP Institute (HISPI)	Taiye Lambo	Minor	18	466	PR.DS-2	The need for sub category effectiveness should be stressed	Change "secured" to "secured effectively"
14	HISP Institute (HISPI)	Taiye Lambo	Minor	19	466	PR.DS-4	The need for sub category adequacy should be stressed	Change "maintained" to "adequately maintained"
15	HISP Institute (HISPI)	Taiye Lambo	Minor	19	466	PR.DS-6	The need for sub category adequacy should be stressed	Change "protected" to "adequately protected"
16	HISP Institute (HISPI)	Taiye Lambo	Minor	19	466	PR.DS-8	Focus on the need to separate development, test and production environments	Change "Separate testing environments are used in system development" to "Separate development, testing and production environment maintained"
17	HISP Institute (HISPI)	Taiye Lambo	Minor	20	466	PR.IP-5	Narrow this sub category down to environmental regulations	Change "regulation" to "environmental regulations"
18	HISP Institute (HISPI)	Taiye Lambo	Minor	21	466	PR.PT-4	Explicitly define "wired and wireless" communication networks	Add "Wired and wireless" to the beginning of this sub category
19	HISP Institute (HISPI)	Taiye Lambo	Minor	22	466	PR.PT-5	"the risk analysis" does not read well	Change "the risk analysis" to "risk analysis"
20	HISP Institute (HISPI)	Taiye Lambo	Minor	22	466	DE.CM-4	The need for sub category effectiveness should be stressed	Change "detected" to "detected effectively"
21	HISP Institute (HISPI)	Taiye Lambo	Minor	23	466	DE.CM-5	The need for sub category effectiveness should be stressed	Change "detected" to "detected effectively"
22	HISP Institute (HISPI)	Taiye Lambo	Minor	23	466	DE.CM-6	The need for sub category effectiveness should be stressed	Change "monitored" to "monitored effectively"
23	HISP Institute (HISPI)	Taiye Lambo	Minor	23	466	DE.CM-7	The need for sub category effectiveness should be stressed	Change "monitored" to "monitored effectively"
24	HISP Institute (HISPI)	Taiye Lambo	Minor	23	466	DE.CM-8	Stress the need to perform vulnerability assessments periodically	Change "performed" to "performed periodically"
25	HISP Institute (HISPI)	Taiye Lambo	Minor	23	466	DE.DP-3	Incomplete statement	Change "readiness" to "incident readiness"
26	HISP Institute (HISPI)	Taiye Lambo	Minor	24	466	Communications (CO)	The need for cooperation with international law enforcement agencies needs to be stressed here	Change "federal, state, and local law enforcement agencies" to "international, federal, state, and local law enforcement agencies"

27	HISP Institute (HISPI)	Taiye Lambo	Minor	25	466	Recovery Planning (RP)	"events" does not seem to be the appropriate terminology here.	Change "cybersecurity events" to "cybersecurity incidents"
28	HISP Institute (HISPI)	Taiye Lambo	Minor	25	466	RC.CO-1	The need for sub category effectiveness should be stressed	Change "managed" to "managed effectively"
29	HISP Institute (HISPI)	Taiye Lambo	Minor	25	466	RC.CO-2	The need for sub category effectiveness should be stressed	Change "repaired" to "repaired effectively"