#	Organization	Commentor	Type	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	Tecsec, Inc	Jay Wack	G/T	All	All	All	The document as written appears to be a list of generally good ideas not specifics	Perhaps recognizing efforts produced by other groups would help. ANSI and ISO come to mind. Why re invent the wheel?
2	Tecsec, Inc	Jay Wack	G/T	All	All	All	Data at Rest is protected is not a Standard	ANSI X9.73-2010 is a Standard that had already been codified and peer reviewed on the matter Why not use it?
3	Tecsec, Inc	Jay Wack	G/T	All	All	All	This document is too broad as currently presented. While Trusted Identities is applicable broadly, various industries are different. SCADA is short time sensitive messaging, health records live for years	Perhaps after stating a general objective an explaination or set of examples for one or two groups might be useful. One size does not fit all.
4	Tecsec, Inc	Jay Wack	G/T	16	All	Appendix A Framework Core	The phrase "Protect" is too vague/broad Protect what, specifically.	A list of specifics would be useful here. State the objective clearly. A) Physical separation of Networks is required or B) Use of encryption and Dynamic Keys for Object Level Access control of physical, logical, functional, and content.
5	Tecsec, Inc	Jay Wack	G/T	9	321	2.4	The idea of Implementation Tiers is not a good one. It is hard enough to accomplish without giving multiple, weaker versions	Set up a Framework and set specific principals or drop the section entirely.
6	Tecsec, Inc	Ron Parsons	G/T	16	N/A	Appendix A Access Control	Multiple Existing and Draft Standards Cover this Area	Suggest Adding ANSI & ISOStandards as References : X9.8, X9.112 (D), X9.122 (D), ISO 9564 (D) Denotes Draft
7	Tecsec, Inc	Ron Parsons	G/T	18	N/A	Appendix A Data Security	Multiple Existing Standards Cover this Area	Suggest Adding ANSI Standards as References X9.119, X9.8, X9.117
8	Tecsec, Inc	Ron Parsons	G/T	30	N/A	Appendix B Data Security	Multiple Existing Standards Cover this Area	Suggest Adding ANSI & ISO Standards as References X9.73, X9.31, X9.62 ISO 16609