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NIST Cybersecurity Framework ISA99 Response to Preliminary Version

Date: December 13, 2013

Organization: International Society of Automation (ISA) / The Automation Federation

Committee: ISA99, Industrial Automation and Control Systems Security
Type: International industry standards development organization

Sector Scope: All industrial sectors and critical infrastructure Technical Scope: Industrial automation and control systems

On behalf of the ISA99 Committee on Industrial and Automation Control Systems (IACS) Security, we are pleased to offer the attached comments on the Preliminary Cyber Security Framework published by NIST. In addition to the specific comments requested we have also provided a summary of our view as to how the ANSI/ISA-62443 (aka IEC 62443) series of standards correlates or "maps" to the NIST Cyber Security Framework.

We feel that this can both serve as guidance for asset owners who have already started adoption of the 62443 series of standards and would like to demonstrate conformance to the NIST Cybersecurity Framework as well as for asset owners who start with the NIST Cybersecurity Framework but need more specific guidance to shape their cybersecurity efforts for their industrial automation and control systems. To that end we request that the Framework be revised to include this information in Appendix B, using the correct ISA/IEC 62443 references.

We appreciate the opportunity to comment on the Framework and look forward to future opportunities to provide input to future revisions.

Respectfully,

Eric C. Cosman James D. Gilsinn

ISA99 Co-Chairs