#	•	Commentor	Туре	Page	Line #	Section	Comment (Include rationale for comment)	Suggested change
				#				
					466 - Framework		Modify "Asset Management" by adding "Data". Further, a definition of Data should be added to the Glossary and make clear PII is a data element to be protected like any other data element that may be implicated in cybersecurity attacks. As part of these recommended edits, we have focused on consistency in terminology throughout the Framework. Throughout, the terms "data" and "assets" are used interchangeably (as well as "resources" and "information" in certain instances). However, "data" and "assets" carry different meanings in the industry. Generally, assets are tangible and intangible things that have value, and in the cybersecurity context, those things of value are the systems, networks, devices and data. Thus, "assets" are the broad category, of which "data" is a component, and more specifically, PII is a component of "data". As such, there should be careful application of specific measures to assets versus data, as the requirements are not interchangeable in all	"The personnel, devices, systems, Data,
1	Microsoft	S. Branam	Е		Core Table	Appendix A		purposes"
	Microsoft	S. Branam	Е		ID.AM-3		Per suggested defined term and ensure consistency.	Capitalize "Data".
	Microsoft	S. Branam	Е		ID.AM-5		Per suggested defined term and ensure consistency.	Capitalize "Data".
							Roles and responsibilities should be established for both cybersecurity and privacy in coordination with one another. May be duplicative of ID.GV-2.	
4	Microsoft	S. Branam	Е	14	ID.AM-6	Appendix A	Example of PbD.	Add "and privacy" after "cybersecurity".
							Roles and responsibilities should be established for both cybersecurity and privacy in coordination with one another. May be duplicative of ID.GV-2.	
5	Microsoft	S. Branam	Е	14	BE	Appendix A	Example of PbD.	Add "and privacy" after "cybersecurity".
6	Microsoft	S. Branam	Е	15	ID.GV-1		Policies related to cybersecurity and privacy should be established in coordination with one another. Example of PbD.	Add "and privacy" after "security".

Roles and responsibilities should be established for both cybersecurity and privacy in coordination with one another. May be duplicative of ID.AM-6. Add "and privacy" after "security". Add "and consider the privacy implications of its cybersecurity in program after "cybersecurity". Add "and consider the privacy implications of its cybersecurity in program after "cybersecurity in security". Add "and consider the privacy implications of its cybersecurity in program after "cybersecurity in security". Add "and consider the privacy implications of its cybersecurity in program after "cybersecurity in security". Add "and consider the privacy implications of its cybersecurity in program after "cybersecurity in security". Add "and consider the privacy implications of its cybersecurity in program after "cybersecurity in security in program" after "cybersecurity in consistency after "cybersecurity in program" after "cybersecurity in program" after "cybersecurity in prog	_	Cyberseearr	ty Framework						Date. December 13, 2013
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17 Microsoft									
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18 Microsoft S. Branam E 19 PR.DS-7 Appendix A May be duplicative of PR.IP-6. Replace "assets are" with "Data is". Suggested definition of Data includes PII, therefore is already covered by PR.DS-1 and PR.DS-2. It is confusing to have a specific cite to PII here but not elsewhere. Delete entirely. Replace "assets are" with "Data is". Delete entirely. Replace "information systems and assets" with "Assets and considers the privacy implications thereof". Per suggested defined term; scope of this requirement Replace "information are" with "Data is". Per suggested defined term; scope of this requirement Replace "information are" with "Data is".	17	Microsoft	S. Branam	E	19	PR.DS-6	Appendix A		Remove entirely.
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		_						Per suggested defined term; scope of this requirement	
	21	Microsoft	S. Branam	E	20	PR.IP-4	Appendix A	is to ensure all Data is backed up.	is".
22 Microsoft S. Branam E 20 PR.IP-5 Appendix A Per suggested defined term and ensure consistency. Capitalize "Assets".	22	Microsoft		Е					Capitalize "Assets".

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23	Microsoft	S. Branam	E	20	PR.IP-6		May be duplicative of PR.DS-7.	Replace "Information" with "Data".
	Microsoft	S. Branam	E	20	PR.IP-8		Per suggested defined term and ensure consistency.	Replace "Information" with "Data".
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							cybersecurity and privacy.	
25	Microsoft	S. Branam	E	21	PR.IP-11		Example of PbD.	Add "privacy" after "Cybersecurity".
	1,110105010	S. Brundin			110,11	Пррепален	Enample of 1 ob.	rida privacy arter cybersecurity:
								Add a category, "Secure Engineering
								(SE): Design and develop technology
								(e.g., hardware, software and services)
								in a manner consistent with international
								standards and industry best practices
								throughout the engineering lifecycle";
								followed by a subcategory, "PR.SE-1:
								Utilize a recognized secure development
								lifecycle process that includes guidance
							Recommend addition of a category and a subcategory	
								practices, controls, and tooling across all
							For additional rationale, see Microsoft's comments on	
26	Microsoft	A. Kleiner	E	21	N/A		the Preliminary Framework.	(design, develop, review, test, approve)"
						1 ''	,	Replace "operational and information
27	Microsoft	S. Branam	Е	21	MA	Appendix A	Per suggested defined term and ensure consistency.	system components" with "Assets".
28	Microsoft	S. Branam	Е	21	PR.MA-1	Appendix A	Per defined term and ensure consistency.	Capitalize "Assets".
								Capitalize "Assets" in "organizational
								assets" and replace "information
29	Microsoft	S. Branam	Е	21	PR.MA-2	Appendix A	Per suggested defined term and ensure consistency.	systems" with "Assets".
							Per suggested defined term and ensure consistency.	Replace "systems and assets" with
							Protective technology may have privacy implications	"Assets while considering related
30	Microsoft	S. Branam	Е	21	PT	Appendix A	and should therefore be appropriately addressed.	privacy implications".
							The audit function implicates privacy and therefore	Replace "audit policy" with "audit and
31	Microsoft	S. Branam	Е	21	PR.PT-1	Appendix A	should be addressed specifically in the Framework.	privacy policies."
								Replace "systems and assets" with
32	Microsoft	S. Branam	Е	21	PR.PT-3	Appendix A	Per suggested defined term and ensure consistency.	"Assets".
								Replace "The information system and
33	Microsoft	S. Branam	Е	22	CM	Appendix A	Per suggested defined term and ensure consistency.	assets" with "Assets".
							It is important that event reporting occur in a manner	
							consistent with the organization's cybersecurity and	Add "and policies related to
							privacy policies.	cybersecurity and privacy" following
_ 34	Microsoft	S. Branam	Е	24	RS.CO-2	Appendix A	Example of PbD.	"established criteria".

Submitted by: Microsoft Corporation

Date: December 13, 2013

ſ									Replace "systems or assets" with
L	35	Microsoft	S. Branam	Е	25	RP	Appendix A	Per suggested defined term and ensure consistency.	"Assets".
								Add discussion of the emerging practice and standards related to software ID tagging, or SWID. For additional rationale, see Microsoft's comments on	For example, software ID tagging, or SWID, is an emerging practice related to supply chain risk management. There is a relatively new standard, ISO/IEC 19770-2, that enables developers and users to verify the origin of software. If a user organization understands which suppliers are implementing secure development practices in conformance with ISO 27034-1, application of ISO/IEC 19770-2 enables that organization to confirm that it is using software that came from those suppliers. Currently, NIST's National Cybersecurity Center of Excellence (NCCoE) and DHS are leading efforts to define the government's expectations regarding SWID. Accordingly, as these workstreams continue to development, they will be ripe for consideration and
L	36	Microsoft	A. Kleiner	Е	39	[645	Appendix C	the Preliminary Framework.	Framework.

37	Microsoft	A. Kleiner	E	42	before 688	Appendix E	Recommend addition of a definition for adoption. For additional rationale, see Microsoft's comments on the Preliminary Framework.	Adoption: An organization (e.g., critical infrastructure owner or operator) utilizes the Framework as baseline guidance in its determination of appropriate cybersecurity risk management activities and related privacy protection efforts. This process should involve adaptation of the Framework to suit organizational needs, including identification of organization-specific activities that give effect to the goals of the Framework but may not be listed in the Framework. Where an organization has aligned its policies, practices, and procedures with an Informative Reference, or provided self-attestation or certification against an Informative Reference, the organization is operating at a fundamentally mature level of implementation.
							Suggested definition - Asset: The personnel, devices, systems, Data, and facilities that enable the	
38	Microsoft	S. Branam	Е	42	before 688		organization to achieve business purposes.	Add a definition of "Asset".
20	Minne	C. D	F.		between 696-		Adding a definition of "Data" would help clarify the scope of application of the various activities in the Framework. The definition should clearly limit the scope to Data implicated by cybersecurity attacks. The definition should make clear that PII is a	
39	Microsoft	S. Branam	Е	42	697	Appendix E	subcategory of Data. The definition of PII should be removed. Each sector	Add a definition of "Data".
							will define PII differently and therefore, it would be	
40	Microsoft	S. Branam	E	42	721-725		futile for the Framework to attempt a definition that is appropriate for all sectors.	Remove definition of PII.
40	IVIICIUSUIT	o. Dialialli	ட	42	141-143	друспил Е	is appropriate for all sectors.	Kemove definition of 1 II.