**Comments to Preliminary Cybersecurity Framework**

<div align="right">Submitted by: FairPoint Communications<br>Date: 12/13/13</div>

**Organization**: FairPoint Communications.

**Commenter**: FairPoint Communications, by and through its in-house counsel, Sean M. Galvin. Contact: E-mail: sgalvin@fairpoint.com; Phone: 207-535-4177.

**Sections**: Page 11; Lines: 321-389. Page 12; Lines 437-449.

**Comment (Include rationale for comment)**:

There is concern that the tier-based approach may have negative market and revenue impacts on small- and medium-sized critical infrastructure businesses. The Framework tiers provide a workable scale for businesses to benchmark their progress and posture as an organization, but such a grading scale has the potential for misuse.

**Suggested Change:**

The Framework should move away from the tier-based system and allow for adoption alone to be the driving force behind use of the Framework and replace tiers with something less likely to be misused such as mature, moderate, and needs attention, and expressly state that these can be and should be used with service providers but are not to be viewed as a grade or an indication of value of a service provider or its ability to address cybersecurity.