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February 9, 2016

Submitted via cyberframework@nist.gov

Ms. Diane Honeycutt
National Institute of Standards and Technology
100 Bureau Drive, Stop 8930
Gaithersburg, MD 20899

RE: NAM Views on the Framework for Improving Critical Infrastructure Cybersecurity

Dear Ms. Honeycutt,

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, appreciates the opportunity to comment on the National Institute of Standards and Technology's (NIST) "Framework for Improving Critical Infrastructure Security," more commonly referred to as the Framework. Manufacturers in the United States value the collaboration with the public sector on this important issue regarding our nation's cybersecurity.

The NAM and our members have been active participants throughout the development and the current utilization of the Framework. We applaud the leadership of NIST in the area of cybersecurity and its commitment to working with industry on a voluntary system that does not lead to any new or unnecessary burdensome regulations.

Our industry was actively engaged in the open workshops hosted by NIST to collect feedback and information on how best to craft the Framework. Many NAM member companies and associations submitted comments in response to the draft version of the Framework released in October of 2013. Since the final Framework was released in February of 2014, it has been effectively utilized by many industries to manage cyber risk. The NAM simultaneously played a leading role in working with Congress to ensure any legislation that moved forward did not adversely impact the ability of manufacturers to secure its products and facilities.

The NAM delivered a consistent message to Congress, NIST, and other parts of the Administration during these discussions and legislative debates. The sharing of real-time threat information between the public and private sector is a critical need for all manufacturers; participation in this new information-sharing regime must be voluntary; any new system should not create any new regulations; and, federal agencies should work to streamline and coordinate the existing regulatory requirements.

The NAM was a strong and vocal supporter of the Cybersecurity Act of 2015 that was signed into a law in December 2015. Manufacturers were pleased the final version adhered to the above-stated principles. As NIST continues to examine the Framework in 2016 and beyond,

we urge that any action taken by NIST and any other federal agency involved in cybersecurity continue to focus on these goals as well. We urge NIST to place a priority on implementing the existing Framework to ensure intended goals are achieved. The NAM cautions against an unwarranted expansion of the scope of the Framework and avoid the potential for an environment that would lead to increased regulations or any disincentive for industry to continue utilizing the Framework.

Moving forward, the NAM recommends for NIST to explore opportunities that will enhance the existing Framework, such as, continuing outreach to manufacturers of all sizes with a focus on smaller firms on how best to utilize the Framework; creating a mechanism that assists manufacturers in understanding the costs and benefits related to leveraging the framework; examining best practices in managing global supply-chain cyber risk while not undermining industry-led, international agreements already in place; and a continued focus on reducing the overlap of existing laws and regulations with an eye on regulatory harmony across all agencies.

Manufacturers understand that our nation's economic security is directly tied to cybersecurity. Manufacturers are the owners, operators, and builders of critical infrastructure with the responsibility of securing sensitive information and intellectual property, networks on which they run and the facilities and machinery they control. An industry-driven, voluntary system that does not create unnecessary regulations is the most effective way to secure these critical assets.

The NAM appreciates this opportunity to comment, the effective partnership with NIST and the federal government's mission to ensure our nation remains secure.

Comments Submitted by:

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