February 9, 2016

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

Dear Ms. Honeycutt:

On behalf of the Professional Services Council (PSC), I am pleased to submit comments in response to the National Institute of Standards and Technology (NIST) request for information on the "Framework for Improving Critical Infrastructure Cybersecurity," otherwise known as the "Framework."

PSC is the voice of the government technology and professional services industry, representing the full range and diversity of the government services sector. As a trusted industry leader on legislative and regulatory issues related to government acquisition, business and technology, PSC helps build consensus between government and industry. Our nearly 400 member companies represent small, medium, and large businesses that provide federal agencies with services of all kinds, including information technology, engineering, logistics, facilities management, operations and maintenance, consulting, international development, scientific, social, environmental services, and more. Through our Technology Council's Cybersecurity committee, we have provided a forum to ensure that the requisite expertise of our member companies and their employees are brought to bear on the vital information technology challenges our government faces. Together, the trade association's members employ hundreds of thousands of Americans in all 50 states.

We applaud your efforts to increase awareness on the national imperative for cybersecurity and are particularly appreciative of your continuing dialogue and engagement with industry on this important topic. We believe that the framework is an important document to help organizations assess and improve their cybersecurity posture and appreciate the emphasis placed on using a risk management approach.

We recommend that going forward, the framework be expanded to include outcome-based measures of performance that would help organizations assess where they are obtaining a return on their cybersecurity investment. By focusing organizations on the measures (and efforts) that matter most, they will be able to track their progress and ensure that scarce resources are applied where they will deliver the most meaningful impact.

Thank you for the opportunity for PSC to provide these comments. We look forward to continuing to work with you on this important topic, and offer our services if we can ever be of help in providing a forum for dialogue with industry. Please feel free to contact me by email at wennergren@pscouncil.org or by phone at 703-778-7557 if you have any questions or need additional information.

Sincerely,

David M. Wennergren
Executive Vice President, Operations & Technology