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

Re: Views on the Framework for Improving Critical Infrastructure Cybersecurity

Dear Diane Honeycutt:

I write on behalf of the Sustainability Accounting Standards Board (SASB), a 501c3 organization that develops sustainability accounting standards for the disclosure of material sustainability information in SEC filings. More than 2,800 individuals—affiliated with companies with \$11.0T market capital and investors representing \$23.4T assets under management—have participated in our standards development process to date. SASB standards, which are grounded in evidence of investor interest and evidence of financial impact, are designed to help companies comply with U.S. securities law. SASB is an American National Standards Institute (ANSI) accredited standards developer.

Thank you for the opportunity to comment on the National Institute of Standards and Technology (NIST) "Framework for Improving Critical Infrastructure Cybersecurity". In our work we seek to harmonize as much as possible with existing frameworks, and we support NIST's efforts to create a standardized cyber security framework to help companies better manage related risks. Furthermore, we also encourage the language and structure of the Framework to facilitate decision useful corporate disclosure. We have heard repeatedly from our stakeholders that cyber security is important to the investment community, but that there is a lack of a standardized way to track, identify, and report risks.

SASB references the Framework in our data security related issues in the following industries: Software & IT Services, Internet Media & Services, Cable & Satellite, Professional Services, Multiline & Specialty Retailers & Distributors, E-Commerce, and Food Retailers & Distributors. For an example, the following is an excerpt from our data security issue in our [Multiline & Specialty Retailers & Distributors standard](#):

.13 The registrant may choose to describe the degree to which its management approach is aligned with an external standard or framework for managing data security, such as:

["Framework for Improving Critical Infrastructure Cybersecurity, Version 1.0,"](#) February 12, 2014, National Institute of Standards and Technology (NIST)"

In conclusion, SASB is in favor of NIST's efforts to create a cybersecurity Framework that would allow for meaningful comparisons between its users. Thank you for the opportunity to comment on this important work.

Sincerely,

Quinn Underriner
Sector Analyst, Technology & Communications
Sustainability Accounting Standards Board