

Ladies and Gentlemen:

We are writing not to utilize your template but to mention two key developments last December that bracketed your December 11, 2015 Request for Information. 80 Fed. Reg. 76934.

Our office represents the Irrigation & Electrical Districts' Association of Arizona whose 25 Members and Associate Members are contractors for federal hydropower from federal dams on the Colorado River. As such, they are keenly aware of the need for protecting these federal facilities, as well as their own facilities, from cyber attacks.

Congress has enacted two key provisions concerning the electric utility industry that may require some special consideration by you in your framework development.

First, on December 4th, Congress passed the so-called FAST Act, the transportation bill. In it were provisions adding protection for Critical Electric Infrastructure Information viz. FOIA and state public records requirements.

Second, on December 18th, Congress passed the Omnibus Appropriation Bill. It included a title forged from the two Intelligence Committee Bills (acronyms CISA and CISPA). Here again, the provisions address these same protections as to "cyber threat indicators" and "defensive measures".

While one might suspect that other industries, especially other utility industries, may now come forward seeking similar treatment, these programs are now in place and, in our view at least, are relevant to your task.

Thank you for the opportunity to comment.

Bob Lynch