

From: **Tim Ridout**
Date: Wed, Apr 5, 2017 at 1:12 PM
Subject: Comments on Framework Version 1.1
To: cyberframework@nist.gov

Dear NIST,

Thank you for the opportunity to comment on the Framework Version 1.1. The only suggestion I have is to eliminate the distinction between "physical" and "virtual." I understand that the "virtual" terminology is common in computer science language, but it's confusing and distracts from important questions. None of the computing could occur if it didn't have a physical existence *somewhere*. For the sake of assessing risk, it's important to know *where* the computing is being done in a geographical sense and who is responsible for the security of those computing assets in terms of national legal jurisdiction and liability, security of the buildings or vehicles in which those assets are stored, reliability of the personnel who have access to those buildings and/or remote access to the servers, existence or not of Mutual Legal Assistance Treaties with the United States (in the case of assets located in a different country), etc.

If the term "virtual" is still desired, it should be explained in the definitions section, and the geographical, jurisdictional, and legal questions should be raised, even if it is a network of mirror servers (or "the cloud") that are continuously transmitting and there is no fixed location of the remotely accessed computing resources.

Thank you for your work.

Best,
Tim Ridout
Comments