This is my comments around a "Request for Comments" issued by NIST.

* Before a framework can be effectivly developed a lucid definition of "CyberSecurity" needs to be established.

* I have been working in the private sector of Information Security for about 12 years and have been functioning as a security architect for the past 3 and have found the SABSA model to be very effective at taking a holistic approach to security architecture. It has had a lot of success in Europe and has been gaining ground in our nation over the past couple of years.

* The framework needs to be driven by open standards so as to not make the framework dependent on proprietary standards that may have a short life span.

* Minimally the framework should address the following security domains:
  - Access Control - Including both authentication and authorization
  - Cryptography - Use of strong ciphers and effective key management
  - Operating System Security - Patching & Hardening techniques and practices
  - Secure Coding - Ensure security-coding practices are being followed
  - Logging & Monitoring - Ensure critical assets are logged and monitored to ensure continous reliability. Use of a SIEM is encouraged for event correlation of security incidents.
  - Network Security - Ensure best practicies are followed for firewalls, routers, switches, Wirless Access Points and the like.
  - Mobile Security - Ensure best security practices are followed around the use of mobile devices.
  - Application Security - Ensure applications are up to date on patches and best practices around web, database, and e-mail security are followed
  - Data Protection - Ensure all data is classified along with protection requirements for each classification of data where appropriate.
  - Cloud Computing - Ensure that services running in the "cloud" are protected that minimizes risk.

* All of the domains should have a security standard drafted that outlines both technical and non-technical requirements around the given domain.

Hope this helps with the initiative to secure and protect our nations cyber-assets.

~Regards,

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