

ANSI Comments on Cybersecurity Green Paper

A Notice of Inquiry Regarding Cybersecurity, Innovation and the Internet Economy, dated June 15, 2011

The American National Standards Institute (ANSI) is pleased to provide this response to the NIST, ITA, and NTIA Notice of Inquiry regarding Cybersecurity, Innovation and the Internet Economy ("Green Paper"), dated June 15, 2011, Docket No.: 110527305-1303-02.

As we stated in previous comments¹, ANSI serves as the coordinator of the United States' private-sector led and public-sector supported standardization system. ANSI is the official U.S. representative to the International Organization for Standardization (ISO) and, via the U.S. National Committee, the International Electrotechnical Commission (IEC). ANSI is also a member of the International Accreditation Forum (IAF) and a number of regional standards and conformity assessment bodies.

ANSI applauds the comprehensive and thoughtful comments set forth in the Green Paper and agrees with four of its fundamental premises:

- the continued need for reliance on ongoing, voluntary standardization and conformity assessment efforts as the best means to create principles and guidelines for promoting best practices and cybersecurity solutions;
- the importance of trust as a prerequisite for successful online transactions—of any sort—that will be undertaken by both businesses and consumers in the Internet environment;
- recognition that cybersecurity is not defined by national borders and thus requires global solutions; and
- the idea that education and public awareness are at the core of a successful strategy to enhance online safety.

Indeed, since 2008, ANSI has worked in partnership with the Internet Security Alliance (ISA) as joint project leaders on private-sector led initiatives to investigate, asses, and address the increasingly vital cybersecurity issues affecting private organizations. Those efforts resulted in the publication of <u>The Financial Management of Cyber Risk: An Implementation Framework</u> for CFOs.²





1 cyber and innovation.

² <u>http://www.ansi.org/news_publications/news_story.aspx?menuid=7&articleid=2489</u>

The ANSI Federation is comprised of organizations, government agencies, companies, academic, and international bodies that are engaged in developing solutions to issues in the public policy domain. ANSI would be pleased to provide assistance in fulfilling many the specific recommendations for reducing cybersecurity vulnerabilities contained in the Green Paper by facilitating efforts to bring together experts to address standards and conformity assessment solutions in both the national and global arena.

We appreciate having the opportunity to offer our response to the ideas expressed in this Department of Commerce Green Paper. For further information on how we might be of service to your efforts, please contact Scott Cooper, vice president of government affairs (scooper@ansi.org; 202-331-3610).

Thank you for the opportunity to comment.