

From: **Gleason, Angela**

Date: Mon, Apr 10, 2017 at 5:23 PM

Subject: American Insurance Association - Comments on Version 1.1

To: "cyberframework@nist.gov" <cyberframework@nist.gov>

Mr. Sedgewick – Please find attached a brief comment letter from the American Insurance Association on Version 1.1 of the Cybersecurity Framework. Thank you for your continued work on this issue and please let us know how we can ever be of assistance. We look forward to your upcoming meetings and truly appreciate the collaborative approach you continue to utilize on this issue.

Thank you,

Angela

Angela Gleason | American Insurance Association

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[Attachment Copied Below]

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April 10, 2017
Adam Sedgewick
National Institute of Standards and Technology
100 Bureau Drive, Stop 8930
Gaithersburg, MD 20899

Via Electronic Mail to cyberframework@nist.gov

Re: Cybersecurity Framework Version 1.1

Dear Mr. Sedgewick:

The American Insurance Association (AIA)¹ welcomes the opportunity to comment on Version 1.1 of the Cybersecurity Framework (“Version 1.1”). As interested entities² with robust information security programs, we appreciate the voluntary and flexible framework that Version 1.1 continues to promote. Companies use a variety of resources, which may include the Cybersecurity Framework, to develop best practices and comply with baseline legal requirements and Version 1.1 remains consistent with recognizing this diverse approach to cybersecurity.

Version 1.1 also attempts to address the issue of cybersecurity metrics and we look forward to seeing what impact these changes will have on addressing the effectiveness of cybersecurity resiliency measures.

While our comments are minimal, we wanted to express our continued support for NIST’s role in maintaining the Cybersecurity Framework as an evolving and evergreen document that keeps pace with the evolving approaches to cybersecurity technology and threats.

Thank you again for your attention to this matter and look forward to continuing to work with you.

Respectfully,

Angela Gleason
Senior Counsel

¹ AIA is the leading property-casualty insurance trade organization, representing over 300 insurers that write more than \$100 billion in premium each year. Our members offer a variety of property-casualty insurance, including personal and commercial auto insurance, commercial property and liability coverage for businesses, homeowners’ insurance, workers compensation, product liability insurance, and medical malpractice coverage.

² “Cybersecurity Framework will provide a prioritize, flexible, repeatable, performance-based, and cost-effective approach, including information security measures and controls to help owners and operators of critical infrastructure and other interested entities to identify, assess, and manage cybersecurity-related risk while protecting business confidentiality, individual privacy and civil liberties.”