

From: "John DiMaria"  
Date: Apr 18, 2017 8:07 AM  
Subject: BSI Comments on the CSF 1.1  
To: "[cyberframework@nist.gov](mailto:cyberframework@nist.gov)" <[cyberframework@nist.gov](mailto:cyberframework@nist.gov)>  
Cc:

Sorry, this is a bit late. Hoping you will accept it.

BSI applauds NIST for the move to inject Metrics into the 1.1 revision. However we caution that Metrics should be used to drive improvements and help businesses focus their people and resources on what's important not what is mandated. We see the tiers as more of a measure of maturity and how well managed the organization is. Metrics are the vehicle that tell you if you are achieving your expected results. This is the foundation that all ISO standards are now built on and require leaders to have clear objectives and have a clear vision of strategic direction. We believe that true organizational resilience is the key.

Resilience is not what happens to an organization; it is what an organization does with what happens to it

Overall, metrics should reflect and support the various strategies for all aspects of the organization, including finance, marketing, competition, standards, or customer requirements and expectations. Metrics indicate the priorities of the company and provide a window on performance, ethos and ambition.

Ultimately, metrics should be the pulse of the organization and tell the organization:

Where it is at now

Where it is heading based on the strategic direction and objectives of the organization

Whether something is going wrong and prompt root cause analysis and corrective action

When the organization reaches its target

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