

FullCircle Communications, LLC
CAGE: 4CJZ9

Executive Summary: FullCircle Communications, LLC, appreciates this opportunity to support the US Department of Commerce's National Institute of Standards and Technology as it seeks input from industry sectors on the development, promulgation, and implementation of national cybersecurity standards (RFI Docket: 130208119-3119-01). Our Comment is composed of two sections: 1) Suggested use of two planning products by NIST for private sector consumption; 2) The need for inclusion of qualitative definitions, use-cases, and operational throughputs in the cybersecurity framework.

1) Suggested use of two planning products by NIST for private-sector consumption. During the NIST's workshop on 3 April 2013, there were calls for: 1) Industry thought-leadership¹; 2) sharing better-practices and effective solutions²; and 3) incentivizing industry involvement³. We observe that NIST may accelerate development/promulgation within all of its constituent communities; not just large corporations; by providing two essential planning products that help orient the private sector, particularly small businesses, to government imperatives so that they may quickly, and effectively contribute without having had years of exposure to regulatory process.

A) The first suggested product is an **automated policy review schema**, which drives:

1. •mechanisms for weighting policy imperatives in cross-cutting security compliance situations;
2. •potential deconfliction between overlapped requirements in the interagency diaspora;
3. •a broader awareness for industry to drive an holistic understanding;

B) The second suggested product is a **reference architecture**, which provides:

1. •qualitative definitions (vice technical standards) that are agreed-upon by the interagency diaspora;
2. •use-case information to contextualize operational realities as the Government currently describes them. This can orient businesses quickly.

Both products could operate independently, and interdependently, as part of a single interface intended for use by the private sector and by policymakers in the interagency diaspora. These products may form part of a strategic alignment framework but they may also be of use, subsequently, for implementation and compliance/evolutionary issues.

2) The need for inclusion of qualitative definitions, use-cases, and operational throughputs in the cybersecurity framework. Throughout the many dialogues we have participated in and observed, we note that sophisticated users (CISOs, CTOs, etc) perform an ongoing meaning deconfliction by lengthy digressions into technical jargon. This is time-consuming, and exclusive of those who are public-facing or operational, with cybersecurity responsibilities, who are not technologists, but could drive significant value into the process. Creating cross-ISAC working group committee/s to work on qualitative definitions (driving use-cases) and exemplar operational throughputs will be a way to incentivize private sector participation, particularly from small businesses, who could be important partners if they only knew how to describe their experiences and innovations; particularly in the case of fused threats comprised of social engineering, sneaker-netting, and public use of social media. Qualitative definitions that are accessible to a broad private-sector user base should be as important as semantic deconfliction and interoperability in databasing.

Respectfully Drafted and Submitted,

Ms. Larisa Breton, MPS, President, FullCircle Communications, LLC

Additional research support from Mr. Adam Katz, FullCircle Communications Associate.

¹ Remarks of Rebecca Blank, Deputy Secretary, Department of Commerce

² Remarks of Jane Holl Lute, Deputy Secretary, Department of Homeland Security

³ Remarks of Patrick D. Gallagher, Under Secretary of Commerce for Standards and Technology and Director of the National Institute of Standards and Technology

Submitted in response to: US Department of Commerce National Institute of Standards and Technology Request for Information, Docket: 130208119-3119-01