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*Submitted Electronically*



National Institute of Standards and Technology  
U.S. Department of Commerce  
1401 Constitution Avenue  
Washington, DC 20230

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**Re: Docket No. 130208119–3119–01**  
***Developing a Framework To Improve Critical***  
***Infrastructure Cybersecurity***  
**Request for Information (RFI)**

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To NIST:

Delivering mobile networks across the globe, Nokia Siemens Networks is acutely aware of security threats to the communications infrastructure in the United States and throughout the world. The company is deeply engaged in network security, across technology development, market and policy perspectives. With a robust portfolio available today that includes hardware, software, services and all aspects of network operations, Nokia Siemens Networks also maintains a commitment to researching and developing the solutions for tomorrow.

That cybersecurity as an issue continues its rise in significance across industries, governments and for consumers is not at all surprising. There are few, if any, remaining aspects of government services, business, and personal lives that do not include a considerable cyber component.

NIST is charged under Section 7 of Presidential Executive Order Number 13636 with leading the development of a framework to reduce cyber risks to critical infrastructure. The RFI has the stated intention of helping NIST create a preliminary framework to inform the establishment of the ultimate Cybersecurity Framework. Nokia Siemens Networks believes that the outcome of this NIST initiative to develop such a Cybersecurity Framework is extremely important, with potential ramifications for a wide range of industries. Moreover, it is likely to have ripple effects across the world. Nokia Siemens Networks believes that it is imperative that the Cybersecurity Framework at all times reflect voluntary, industry-led initiatives and remain flexible and nimble in reflection of the environment in which networks operate today.

In lieu of a detailed response to the RFI, Nokia Siemens Networks directs NIST to submissions that are being made on behalf of the industry to which it belongs. In particular, Nokia Siemens Networks is an active participant in CTIA's Cybersecurity Working Group. CTIA's comment filing in response to this RFI provides a thorough overview of many of the extensive efforts of industry to define voluntary standards, guidelines and best practices for securing wireless communications infrastructure. The Telecommunications Industry

Association (TIA), in which Nokia Siemens Networks is a member, also offers an accounting of activities that in part also extend to the broader information and communications technology (ICT) sector.

Nokia Siemens Networks observes that network security calls for global solutions. For example, Nokia Siemens Networks is a leading contributor to the Third Generation Partnership Program (3GPP). 3GPP enables the rollout of mobile networks across the world through the development of standards for 3<sup>rd</sup> generation Universal Mobile Telecommunications Systems (UMTS) and Long Term Evolution (“LTE”). 3GPP releases include a wide range of techniques and protocols for securing mobile networks and devices.

The industry association comments quite ably demonstrate that the telecommunications industry is addressing cybersecurity across a wide range of organizations, both within industry as well as between industry and government. Enhancing this cooperative framework should be the overriding objective, as NIST and the Administration rightfully suggest. We urge that this course be maintained. Efforts in the U.S. Congress to enhance information sharing capabilities are of course welcome and ultimately will be necessary, but progress is attainable in the meantime.

Nokia Siemens Networks is fully committed to continued collaboration with industry and government stakeholders, including NIST, on the multi-faceted and complex issues encompassed within the notion of Cybersecurity.

Respectfully submitted,

*/s/ Derek Khlopin*

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