



December 13, 2013

Information Technology Laboratory
Attn: Adam Sedgewick
National Institute of Standards and Technology
100 Bureau Drive
Gaithersburg, MD 20899-8930

Re: ACC Comments on Preliminary Cybersecurity Framework

Dear Mr. Sedgewick:

The American Chemistry Council's (ACC) Chemical Information Technology Center (ChemITC) submits the attached comments on the Preliminary Cybersecurity Framework. ACC represents the leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care®, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing. The business of chemistry is a \$770 billion enterprise and a key element of the nation's economy. Safety and security have always been primary concerns of ACC members, and they have intensified their efforts, working closely with government agencies to improve security and to defend against any threat to the nation's critical infrastructure.

ChemITC supports the framework and its flexibility. The framework is complimentary to the Security Code included into ACC's Responsible Care® Program and other voluntary frameworks that have similar goals. The business of chemistry is global, and one goal of the NIST cyber framework should be compatibility with frameworks used in other jurisdictions. In this regard, the framework should be compatible with the ISO standards addressing cyber security, similar to the manner in which the ACC Responsible Care® Program is complimentary to the ISO 14000 series of standards.

ChemITC recommends that NIST better define and clarify what constitutes successful adoption of the framework and ensure that it is focused on critical infrastructure. By providing a clear definition of adoption and by focusing on critical infrastructure, the Department of Homeland Security (DHS) will be able to recognize those who have successfully adopted the framework.





This action will in turn encourage adoption across the critical infrastructure community and allow for consistent tracking of performance and risk reduction.

ACC looks forward to working with the DHS in implementing the framework for the chemical sector. Please contact me at (202) 249-6714 or bill_gulledge@americanchemistry.com with any questions regarding this submittal.

Sincerely,

Bill Gulledge

Bill Gulledge
Senior Director, Chemical Products & Technology
Division
Manager, ChemITC Program

