

#	Organization	Commentor	Type	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	WTA	WTA	G	11	402	3.1	In regards to discussion of how the framework would be implemented by "senior executive," see pg. 4-5 of WTA's comments. "WTA has concerns whether NIST's Cybersecurity Framework will be effectively scalable with respect to small companies, and, if so, how such scalability will be implemented. As presently described, it appears that the Cybersecurity Framework is predominately designed for large companies with substantial cybersecurity departments or task forces. As discussed above, WTA's RLEC members have very small staffs and very limited financial and other resources that can be dedicated to cybersecurity efforts." Pg. 10-11.	"In the next iteration, it would be very helpful if NIST could provide some examples of how the Framework could be scaled down to provide effective procedures and assistance for the hundreds of RLECs and other very small service providers that need to address cybersecurity issues." See pg. 10-11 in WTA's comments.

2	WTA	WTA	G	12	420	3.2	<p>This section assumes access to "outside threat data" or knowledge of "emergent risks." Due to the small size of RLECs, such access to information is not necessarily easily obtainable or affordable. See pg. 11-12 of WTA's comments. "Since there are advantageous network effects of an information-sharing program where many entities participate to the extent they are practically and financially able, the program should include mechanisms through which small companies with fewer resources are able to participate and benefit from shared cyber-threat information without requiring reciprocal information sharing agreements or burdensome payments.</p>
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3	WTA	WTA	G	12	438-449	3.3	See pg. 10 of WTA's comments. "Federal regulators should ensure that the lack of adoption of a specific level or specific set of cybersecurity preparations as described by NIST's cybersecurity tier-based framework cannot be used by private entities to skirt existing regulatory responsibilities such as network interconnection. Additionally, it should be made clear that NIST's Cybersecurity Framework is one of many cybersecurity standards available for businesses and that it should not become the de facto legal standard by which companies are judged when faced with a legal inquiry for a potential cyber-breach."	
4	WTA	WTA	G	12	426	3.2	WTA's concern with the suggestion that companies "determine gaps, and then determine resources necessary to address the gaps," relates to comment #1, in that RLECs have very small staffs and budgets and are subject to a financial squeeze resulting from the FCC's USF/ICC order. See also pg. 1-3 of WTA's comments. Additionally, the framework does not seem to address how a company would be able to address the costs of cybersecurity, or how to plan for these costs and where they should prioritize their resources and efforts in the initial adoption phase.	NIST should include a discussion of how entities can deal with the costs associated with implementing the cybersecurity framework including what types of resources are necessary in the identification phase. A small company with limited experience in cybersecurity will be least informed on what types of resources will be needed to conduct the identification phase.

5	WTA	WTA	G	28	487-490	Appx. B	The privacy and civil liberties section does not discuss how these steps interact with other sector specific federal privacy requirements such as CPNI regulations.	Future iterations of the NIST framework and other frameworks developed by sector specific regulators should address the interactions between cybersecurity FIPPs and sector specific privacy regulations.
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WTA: ADVOCATES FOR RURAL BROADBAND

Submitted by the undersigned

By: /s/ Derrick B. Owens

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Derrick B. Owens
Vice President of Government Affairs for WTA
derrick@w-t-a.org

Noah K. Cherry
Director of Government Affairs for WTA
noah@w-t-a.org

317 Massachusetts Avenue N.E., Ste.300C
Washington, DC 20002
(202) 548-0202

Gerard J. Duffy
Regulatory Counsel for WTA
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP
2120 L Street NW Suite 300
Washington, DC 20037
(202) 659-0830
gjd@bloostonlaw.com