

---

## Preliminary Cybersecurity Framework Comments

---

Isganitis, Edward J

Fri, Dec 13, 2013 at 10:15 AM

Mr. Adam Sedgewick  
Information Technology Laboratory  
National Institute of Standards and Technology  
100 Bureau Drive, Stop 8930  
Gaithersburg, MD 20899-8930

Dear Mr. Sedgewick,

Applied Communication Sciences and the SI Organization appreciate this opportunity to provide comments on the NIST Preliminary Cybersecurity Framework, in response to the NIST Request for Comment of October 29, 2013.

In general, we think the development of such a Framework is a worthwhile exercise, and we commend NIST and the industry and government stakeholders who contributed to the process on the progress that has been made. The Preliminary Framework is a good first step toward the goal of identifying a common, generic set of industry best practices for assuring the cybersecurity of critical infrastructure. It also establishes a common cybersecurity language for use by suppliers, consumers, users, assessors, government regulators, and others. That said, we do believe the Preliminary Framework is deficient in some key areas, as many stakeholders have already expressed at the previous Workshops and in recently submitted comments.

The attached spreadsheet contains comments and suggestions from several reviewers within our respective companies. Please feel free to contact me if you have any questions about our submission.

### **About Applied Communication Sciences (ACS):**

Drawing on its Telcordia, Bellcore and Bell Labs heritage, Applied Communication Sciences delivers advanced research, consulting and engineering to enable government agencies, telecom carriers and commercial enterprises to fully exploit the future of communications and information technologies. The company is headquartered in Basking Ridge, NJ, and is a wholly-owned subsidiary of The SI Organization, Inc. For more information about Applied Communication Sciences, please visit [www.appcomsci.com](http://www.appcomsci.com).

### **About the SI Organization:**

The SI is a leading provider of full life cycle, mission-focused systems engineering and integration capabilities to the U.S. Intelligence Community, Department of Defense and other agencies. Our scalable systems engineering

platform for modeling, simulation and analysis helps customers baseline requirements, optimize resources and manage risk. We have a 40-year history of successfully delivering complex, system-of-systems technology solutions. In November 2010, the SI separated from Lockheed Martin and became an independent company. The SI employs approximately 2,000 people, with major locations in Chantilly, VA; Denver, CO; Laurel, MD; Los Angeles, CA; St. Louis, MO; and Valley Forge, PA. In addition, we have employees on-site supporting customers in Alabama, Georgia, Hawaii, Massachusetts, New Mexico and Texas, as well as stationed internationally in the United Kingdom, Germany and Japan. For more information about the SI, please visit [www.thesiorg.com](http://www.thesiorg.com).

Best Regards,

***Ed Isganitis***

Principal Systems Engineer

Applied Communication Sciences



**preliminary-cybersecurity-framework-comments from ACS and the SI\_13December2013.xlsx**

14K