

#	Organization	Commentor	Type	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	CTIA / NCTA / USTA		G	1	82	1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to make the sentence read: "Because the risk of each organization voluntarily seeking to use or implement the Framework is unique . . ."
2	CTIA / NCTA / USTA		G	1	84	1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to add "organization voluntarily seeking to use or implement the Framework"
3	CTIA / NCTA / USTA		G	1	88	1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Insert language before paragraph beginning on line 88: "Use of the Framework is purely voluntary. The Framework is not intended to create any rights or obligations or be used as basis for liability or responsibility in any legal or regulatory proceeding."
4	CTIA / NCTA / USTA		G	1	89	1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
5	CTIA / NCTA / USTA		G	1	91	1	NIST should clarify that use of government standards is not required by private organizations.	Add a Footnote to the sentence ending in line 91: "While included for completeness, use of government standards by non-government organizations is not required or recommended."
6	CTIA / NCTA / USTA		G	1	96	1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"
7	CTIA / NCTA / USTA		G	2	101	1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to add "organization voluntarily seeking to use or implement the Framework"

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8	CTIA / NCTA / USTA		G	2	101	1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
9	CTIA / NCTA / USTA		G	2	103	1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to add "organization voluntarily seeking to use or implement the Framework and . . ."
10	CTIA / NCTA / USTA		G	2	103	1	NIST should promote flexibility and avoid a methodology that might duplicate an organization's existing practices.	Add after the sentence concluding on line 103: "Some organizations may already amply satisfy the Framework's goals, for example by complying with relevant best practices or receiving independent certifications."
11	CTIA / NCTA / USTA		G	2	104	1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
12	CTIA / NCTA / USTA		G	2	119	1.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
13	CTIA / NCTA / USTA		G	3	130	1.1	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	At the end of the first bullet, add: "Categories, Sub-Categories and Informative References are provided as illustrative tools and are neither intended to constrain implementation nor required for an organization to have satisfactorily used or implemented the Framework."
14	CTIA / NCTA / USTA		G	2	135	1.1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"
15	CTIA / NCTA / USTA		G	2	136	1.1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"

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16	CTIA / NCTA / USTA		G	2	137	1.1	Using the word "should" contradicts the voluntary nature of the Framework	Replace the word "should" with "may": "Organizations which voluntarily review and select relevant categories from the Framework Core, may review the corresponding category section in the privacy methodology."
17	CTIA / NCTA / USTA		G	2	141	1.1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to add "organization voluntarily seeking to use or implement the Framework"
18	CTIA / NCTA / USTA		G	2	142	1.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
19	CTIA / NCTA / USTA		G	3	146	1.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
20	CTIA / NCTA / USTA		G	3	148	1.1	Language can be strengthened to emphasize that profiles are for internal use.	Modify the sentence to read: "Profiles voluntarily created are intended and suitable for internal use, and only for sharing externally in the discretion of the organization."
21	CTIA / NCTA / USTA		G	3	148	1.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
22	CTIA / NCTA / USTA		G	3	161	1.2	Using the word "should" contradicts the voluntary nature of the Framework	Replace the word "should" with "may attempt to"
23	CTIA / NCTA / USTA		G	3	164	1.2	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
24	CTIA / NCTA / USTA		G	3	167	1.2	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
25	CTIA / NCTA / USTA		G	3	170	1.2	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"

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26	CTIA / NCTA / USTA		G	3	172	1.2	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"
27	CTIA / NCTA / USTA		G	3	183	1.2	NIST should more explicitly recognize that different organizations will have different profiles, cost-benefit analyses, and appropriate responses.	At the end of the paragraph, add the sentence: "The Framework should not be seen as a one-size-fits-all solution for those organizations voluntarily seeking to use or implement it, and organization's own profile and cost-benefit analysis will determine which aspects of Framework use are appropriate for each organization."
28	CTIA / NCTA / USTA		G	4	188	1.3	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
29	CTIA / NCTA / USTA		G	5	201	2	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
30	CTIA / NCTA / USTA		G	5	203	2	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Add after "Different types of entities" the language "voluntary seeking to use or implement the Framework . . ."
31	CTIA / NCTA / USTA		G	5	204	2	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
32	CTIA / NCTA / USTA		G	5	204	2	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
33	CTIA / NCTA / USTA		G	6	221	2.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
34	CTIA / NCTA / USTA		G	6	239	2.1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"

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35	CTIA / NCTA / USTA		G	7	282	2.2	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"
36	CTIA / NCTA / USTA		G	7	285	2.2	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
37	CTIA / NCTA / USTA		G	7	294	2.2	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	After the first sentence, add: "Categories, Sub-Categories and Informative References are provided as illustrative tools and are neither intended to constrain implementation nor required for an organization to have satisfactorily used or implemented the Framework."
38	CTIA / NCTA / USTA		G	7	295	2.2	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"
39	CTIA / NCTA / USTA		G	8	303	2.2	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations, sectors, and other entities" to add "organizations, sectors, and other entities voluntarily seeking to use or implement the Framework"
40	CTIA / NCTA / USTA		G	9, Fig. 3	320	2.3	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to add "organization voluntarily seeking to use or implement the Framework"
41	CTIA / NCTA / USTA		G	9	322	2.4	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to add "organization voluntarily seeking to use or implement the Framework"

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42	CTIA / NCTA / USTA		G	9	322	2.4	Use of "may" emphasizes the voluntary nature of the Framework.	Change the first sentence to "The Framework Implementation Tiers ("Tiers") describe how an organization choosing to use or implement the Framework may manage its cybersecurity risk."
43	CTIA / NCTA / USTA		G	9	328	2.4	Using the word "should" contradicts the voluntary nature of the Framework	Replace the word "should" with "may" and modify "organizations" to add: "Organizations voluntarily seeking to use or implement the Framework may use this model to determine the desired Tier."
44	CTIA / NCTA / USTA		G	9	330	2.4	Language can be strengthened to emphasize that profiles are for internal use.	Add after the sencece that ends "to implement" the following sentence: "Profiles voluntarily created are intended and suitable for internal use, and only for sharing externally in the discretion of the organization."
45	CTIA / NCTA / USTA		G	10	357	2.4	NIST should clarify references to "information sharing" to encourage use of the Framework	In the "External Participation" bullet, the sentence should read: "The organization knows its role in the large ecosystem, but has not identified or formalized any desired capabilities . . ."
46	CTIA / NCTA / USTA		G	10	366	2.4	The Framework should be scalable across organizations of different sizes.	Remove the last sentence in the second bullet.
47	CTIA / NCTA / USTA		G	10	369	2.4	NIST should clarify references to "information sharing" to encourage use of the Framework	In the "External Participation" bullet, the sentence should read: "The organization understands its dependencies and partners and, as appropriate, may receive information . . ."
48	CTIA / NCTA / USTA		G	10	380	2.4	NIST should clarify references to "information sharing" to encourage use of the Framework	In the "External Participation" bullet, the second sentence should read: "Cybersecurity risk management is part of the organizaiton culture and can evolve in response to previous activities, information that may be shared by other sources, as appropriate, and . . ."

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49	CTIA / NCTA / USTA		G	11	383	2.4	NIST should clarify references to "information sharing" to encourage use of the Framework	In the "External Participation" bullet, the sentence should read: "The organization manages risk and may actively share, as appropriate, information with others to ensure . . ."
50	CTIA / NCTA / USTA		G	11	386	2.4	Using the word "should" contradicts the voluntary nature of the Framework	Replace the word "should" with "may"
51	CTIA / NCTA / USTA		G	11	391	3	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
52	CTIA / NCTA / USTA		G	11	393	3	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	Edit the second sentence of the paragraph to read: "The Framework provides a means of expressing chosen cybersecurity goals, policies, or requirements with stakeholders and can help identify gaps in an organization's cybersecurity practices."
53	CTIA / NCTA / USTA		G	11	394	3	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify the end of the sentence to read "in the cybersecurity practices of an organization voluntarily seeking to use or implement the Framework."
54	CTIA / NCTA / USTA		G	11	394	3	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
55	CTIA / NCTA / USTA		G	11	397	3.1	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations" to add "organizations voluntarily seeking to use or implement the Framework"
56	CTIA / NCTA / USTA		G	11	397	3.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
57	CTIA / NCTA / USTA		G	11	400	3.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
58	CTIA / NCTA / USTA		G	11	404	3.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
59	CTIA / NCTA / USTA		G	11	405	3.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"

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60	CTIA / NCTA / USTA		G	11	407	3.1	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
61	CTIA / NCTA / USTA		G	11	410	3.2	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organization" to add "organization voluntarily seeking to use or implement the Framework"
62	CTIA / NCTA / USTA		G	11	410	3.2	NIST should add language to clarify that its word choices are not commands or normative descriptions.	Delete the word "recommended"
63	CTIA / NCTA / USTA		G	12	437	3.3	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	Edit Section 3.3's header to refer to "Communicating Chosen Cybersecurity Goals, Policies, or Requirements with Stakeholders."
64	CTIA / NCTA / USTA		G	12	448	3.3	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
65	CTIA / NCTA / USTA		G	12	450	3.4	Section 3.4 implies that standards and best practices do not meet the goals of the Framework unless and until they are included as Informative References.	Remove Section 3.4.
66	CTIA / NCTA / USTA		G	12	451	3.4	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
67	CTIA / NCTA / USTA		G	13	457	App. A	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	Change the header "Informative References" to "Illustrative Informative References"

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68	CTIA / NCTA / USTA		G	13	459	App. A	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	Add a footnote that expands upon the language in the "Disclaimer" on page i, Note to Reviewers: "Any mention of a particular standard, practice, solution or product as an Informative Reference is for information only; it does not imply NIST recommendation or endorsement, nor does it imply that the standard, practice, solution or product identified are necessarily the best available for the purpose."
69	CTIA / NCTA / USTA		G	13	460	App. A	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Modify "organizations, sectors, and other entities" to add "organizations, sectors, and other entities voluntarily seeking to use or implement the Framework"
70	CTIA / NCTA / USTA		G	13	460	App. A	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	Add to the sentence: "... and other entities to add or remove Categories, Subcategories and/or Informative References that are <u>and</u> are <u>not</u> relevant to them ..."
71	CTIA / NCTA / USTA		G	13	460	App. A	Using the word "may" reinforces the voluntary nature of the Framework	Replace the word "can" with "may"
72	CTIA / NCTA / USTA		G	13	464	App. A	NIST should clarify that use of government standards is not required by private organizations.	At the end of the paragraph, add: "While included for completeness, use of government standards by non-government organizations is not required or
73	CTIA / NCTA / USTA		G	13	464	App. A	NIST should clarify that organizations that voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	Add a sentence at the end of the paragraph: "Organizations may use any security control standard or best practice that best matches their business need and the outcome associated with the respective Sub-Category."

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74	CTIA / NCTA / USTA		G	13	465	App. A	NIST should include language to clarify that the Framework is voluntary and not intended to create obligations, rights, or responsibilities by individual companies or industries.	Insert language before Table 1: "Use of the Framework is purely voluntary. The Framework is not intended to create any rights or obligations or be used as basis for liability or responsibility in any legal or regulatory proceeding."
75	CTIA / NCTA / USTA		G	26	475	App. A	Use of government standards are not required by private organizations.	Remove NIST SP 800-53 Rev. 4 as an informative reference.
76	CTIA / NCTA / USTA		G	23	2	DE-DP-2 App. A	References to privacy and civil liberties in the Framework Core will discourage use of the Framework. Such references should be removed from the Framework Core in Appendix A, Table 1.	Remove "including those related to rivacy and civil liberties" from DE.DP-2
77	CTIA / NCTA / USTA		G	15	ID.GV-3	App. A	References to privacy and civil liberties in the Framework Core will discourage use of the Framework. Such references should be removed from the Framework Core in Appendix A, Table 1.	Remove "including privacy and civil liberties obligations" from ID.GV-3
78	CTIA / NCTA / USTA		G	15	ID.RA-2	App. A	NIST should clarify references to "information sharing" to encourage use of the Framework	Revise ID-RA-2 to read: "Threat and vulnerability information may be received, as appropriate, from information sharing forums and sources."
79	CTIA / NCTA / USTA		G	19	9	PR-DS-9 App. A	References to privacy and civil liberties in the Framework Core will discourage use of the Framework. Such references should be removed from the Framework Core in Appendix A, Table 1.	Delete PR-DS-9 in its entirety.
80	CTIA / NCTA / USTA		G	20	PR-IP.8	App. A	NIST should clarify references to "information sharing" to encourage use of the Framework	Revise PR-IP-8 to read: "Information sharing may occur, as appropriate, with other parties."
81	CTIA / NCTA / USTA		G	24	3	RS-CO-3 App. A	References to privacy and civil liberties in the Framework Core will discourage use of the Framework. Such references should be removed from the Framework Core in Appendix A, Table 1.	Remove "including those related to rivacy and civil liberties" from RS-CO-3

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82	CTIA / NCTA / USTA		G	24	4	RS-CO-4 App. A	References to privacy and civil liberties in the Framework Core will discourage use of the Framework. Such references should be removed from the Framework Core in Appendix A, Table 1.	Remove "including those related to rivacy and civil liberties" from RS-CO-4
83	CTIA / NCTA / USTA		G	24	5	RS-CO-5 App. A	NIST should clarify references to "information sharing" to encourage use of the Framework	Revise RS.CO-5: "Voluntary coordination may occur with external stakeholders (ex, business partners, information sharing and analysis centers (as appropriate), customers)"
84	CTIA / NCTA / USTA		G	13-26	Table 1	App. A	NIST should clarify that organizations which voluntarily use the Framework are free to choose and develop their own standards, guidelines, or practices under relevant Functions and Categories which may accomplish the same objective as those in the Framework.	Within Appendix A, verbs in the Sub-Category column are changed from "are" and "is" to "can be" or "may be." Within Appendix A, verbs in the Category column are changed from "are" and "is" to "can be" or "may be."
85	CTIA / NCTA / USTA		G	13-32	Tab. 1, Tab. 3	App. A, App. B	Use of government standards are not required by private organizations.	Remove NIST SP 800-53 Rev. 4 as an informative reference.
86	CTIA / NCTA / USTA		G	13-32	Tab. 1, Tab. 3	App. A, App. B	NIST should clarify that use of government standards is not required by private organizations.	In the alternative, should NIST choose to retain NIST SP 800-53 Rev. 4 as an informative reference, an asterisk footnote should be added for each use of this reference. The asterisk footnote should read: "While included for completeness, use of government standards by non-government organizations is not required or recommended."
87	CTIA / NCTA / USTA		G	28-35		App. B	Private sector entities would be much more likely to use the Framework if the privacy methodology took a tailored, flexible, and process-oriented approach.	NIST should adopt the Alternative Privacy Methodology submitted to NIST on December 5th 2013.

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88	CTIA / NCTA / USTA		G	42	686	App. E	Defining "may" would provide clarity for readers of the document	Define "may" as: "This and similar words mean that an item is truly optional. An organization electing to use the Framework may choose to use a certain aspect of the Framework, while another organization may omit the same item."