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Submitted via email: csfcomments@nist.gov

December 13, 2013

Information Technology Laboratory
Attn: Adam Sedgewick
National Institute of Standards and Technology (NIST)
10 Bureau Drive, Stop 8930
Gaithersburg, MD 20899

Re: Preliminary Cybersecurity Framework Comments

Dear Mr. Sedgewick:

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the Preliminary Cybersecurity Framework. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 139 Georgia credit unions that have over 1.9 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

GCUL supports the development of “critical infrastructure” cybersecurity framework. Recognizing that sound data security standards and requirements are already in place for financial institutions, we ask the NIST to coordinate closely with all financial regulators, including the National Credit Union Administration (NCUA) to ensure the framework is consistent with, and does not expand the scope of existing rules and regulations. We would also ask for additional coordination between the public and private sectors on cybersecurity.

As mentioned, financial institutions are already subject to cybersecurity and data security requirements from the Gramm-Leach-Bliley Act (GLBA), standards from the Federal Financial Institutions Examination Council (FFIEC) and the National Credit Union Administration (NCUA).

We are concerned that the framework not expand the scope of privacy and civil liberties beyond “critical infrastructure” cybersecurity activities. This could cause potential conflicts with existing laws, regulations and other rules.

While we support the cybersecurity framework, we do not want to see new requirements imposed on financial institutions, which are already overwhelmed with compliance burdens.

We believe the NIST should focus on maximizing the ability of the federal government to address communications and other gaps that undermine the ability of sectors, such as financial institutions, to protect themselves. We ask the NIST to focus on education and to continue to provide timely access to information so all stakeholders are informed of cyber threats and can take steps to protect their interests. We would also like to see more coordination between national enforcement and intelligence-gathering agencies to help identify potential threats. We feel that these are areas that the NIST can better help financial institutions, rather than imposing new requirements.

GCUL appreciates the opportunity to present comments on behalf of Georgia's credit unions. Thank you for your consideration. If you have questions about our comments, please contact Selina Gambrell or Cindy Connelly at (770) 476-9625.

Respectfully submitted,

A handwritten signature in cursive script that reads "Selina M. Gambrell". The signature is written in dark ink and is positioned below the "Respectfully submitted," text.

Selina M. Gambrell
Compliance Specialist