

#	Organization	Commentor	Type	Page #	Line #	Section	Comment (Include rationale for comment)	Suggested change
1	Electrosoft	Various	T		114-2 130	1.1	The word "Identify" does not seem to be broad enough to cover the sets of activities included under Categories and Subcategories for this function.	Suggest renaming the function "Identify" to "Plan" to better encompass the nature of the Categories and Subcategories under the first function.
2	Electrosoft	Various	T		114-2 130	1.1	The five functions in the Core seem to be somewhat linear in nature. Additionally, the latter three functions are mostly "incident-driven" - implying actions occur only when a cybersecurity incident occurs.	Recommend that the functions be used to create a cycle such that "identify" and "protect" comprise a loop that repeats regardless of cybersecurity events, and that "detect", "respond" and "recover" comprise a larger loop that spins out from the "protect" function and reconnects back to the "Identify" function. This would allow revisiting the "Identify" function when policy drivers and mandates change or assets or processes change or when cybersecurity events occur which cause the organization to revisit the "Identify" and "Protect" functions.
3	Electrosoft	Various	T	7,8		2.2	The Framework Profile description indicated that the Y-axis is the combination of Functions/Categories/Subcategories. However, it is unclear what is the X-axis for the profile.	Define the X-axis for the profiles shown in Figure 2.
4	Electrosoft	Various	T	9		2.3	Figure 3 refers to "Changes in Assets, Vulnerabilities and Threat". However, it is not apparent what Categories/Subcategories of the Framework Core require an organization to monitor changes in its assets, policies or processes.	Within the "Identify" function, include activities related to monitoring changes in assets and conducting risk or vulnerability analyses on a continuing basis.
5	Electrosoft	Various	T	9		2.4	It is not clear how the Framework Implementation Tiers relate to the Core and the Profiles in this (Preliminary) Version of the Framework.	Clarify whether the Tiers apply to a Function/Category/Subcategory combination or to an Organization's cybersecurity program as a whole.

6	Electrosoft	Various	T	23		DE.CM-8	Vulnerability assessments are performed as a part of the "Detect" Function.	Recommend that this subcategory be consolidated with ID.RA-1 as a part of the risk assessment process which is conducted periodically under the "Identify" function.
7	Electrosoft	Various	T	13		App A	"Activities can be selected from the Framework Core during Profile creation ..."	Recommend making some of the categories/subcategories mandatory and expressing the dependencies between some of the subcategories. For example, ID.RA-5 is dependent upon ID.RA-1 through ID.RA-4.