

Dear NIST/NICE:

Thank you for the opportunity to comment on the NICE Cybersecurity Framework.

First, I congratulate you on this excellent work. The Framework is a tremendous addition to the efforts to keep the nation safe by building the workforce cybersecurity capacity we need. It has and will help professionals of all types -- IT program managers, security officers, human resources, and job seekers -- think through what they need and how to qualify for positions in this critical profession.

My comments are few:

1. The Framework does not appear to adequately account for the volatility of the knowledge, skills, and abilities needed in this fast-changing field. Actions (and KSA's) that seek to probabilistically forecast the dimensions of this volatility can help identify those anticipated workforce capability needs and prepare for them.

Unfortunately, competencies mine past information on KSAs, are backward-looking, and limited in factoring in uncertainty. Bringing this volatility forward and with greater prominence in the Framework could help better prepare our organizations and workforces for the volatile and uncertain future we face in this area.

2. Many of our cybersecurity vulnerabilities are not in the federal sector, but in private, non-profit, state, local, tribal, and other sectors of our society. You may cover this in other publications of which I am unaware. Providing practical information for how these sectors can effectively deploy the Framework would be a positive contribution.

Again, thank you for your efforts and the opportunity to respond.

Best,

Peter Bonner
4334 Delegate Court
Fairfax, VA 22030