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**Date:** Thursday, April 4, 2013 4:02 PM

**To:** cyberframework < cyberframework@nist.gov >

Subject: Developing a Framework to Improve Critical Infrastructure Cybersecurity

To whom it may concern,

My name is Tom Tanin. I am a Navy civilian at the Space and Naval Warfare System Center Pacific (SPAWARSYSCEN PAC) working in the computer network defense (CND) arena.

I am writing to express my concern over the push from government to be non-specific in the implementation of cyber security controls framework. Not providing organizations with some direction to enable them to prioritize investments will not lead to a more secure network infrastructure. I am urging you to consider the adoption of the Critical Security Controls (CSC) as the model framework for the following reasons:

- 1. A common framework is a good idea because it will allow large numbers of organizations to know what needs to be done first and thereby lower costs and improve effectiveness.
- 2. The key to an effective framework is that it can be shown prioritize controls that stop known attacks so that money can be used wisely.
- 3. The one framework I have seen is the Critical Security Controls (previously known as the SANS Top 20 or the 20 Critical Controls).
- 4. Organizations have found that investing in this framework makes security more effective, eliminates waste, and enables active monitoring and measurement for continuous improvement.
- 5. I strongly recommend that the Executive Order team adopts the Critical Security Controls as the framework as the telecom industry and power industry have already demonstrated that these controls are applicable and important.

I appreciate your help and assistance.

V/r,
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