



January 15, 2018

Dr. Gregory White
Executive Director
ISAO Standards Organization
San Antonio, TX 78249

Dear Dr. White:

On behalf of the Communications Sector Coordinating Council (CSCC), we respectfully submit the following comments on the Information Sharing and Analysis Organization (ISAO) certification proposal released for public comment on December 1, 2017.

The Communications Sector is one of 16 Critical Infrastructure and Key Resource sectors and has a long history of cooperation within its membership and with other sectors and the Federal government in support of national security and emergency preparedness. The CSCC was established in 2005, to help coordinate initiatives to improve the physical and cyber security of communications sector assets; to ease the flow of information within the sector, across sectors and with designated Federal agencies; and to address issues related to response and recovery following an incident or event. The CSCC is a strong proponent of information sharing, is directly aligned with the DHS National Coordinating Center/Communication Information Sharing and Analysis Center, and participates in several activities promoting it, including exercises and cross-sector engagements. The 44 members of the CSCC broadly represent the sector and include cable, commercial and public broadcasters, information service providers, satellite, undersea cable, telecom providers, service integrators, equipment vendors, wireless and wireline owners and operators and their respective trade associations.

Member associations of the CSCC, including but not limited to NTCA—the Rural Broadband Association, collectively represent more than 1,000 U.S.-based communications companies. NTCA's rural operators alone provide critical telecom services to approximately 37 percent of America's landmass, but less than 5 percent of the nation's population. NTCA's members vary tremendously in size; however, all of NTCA's members are small businesses. Many CSCC members, including NTCA's small business members, are important stakeholders in the ISAO standards organization and are active participants of existing ISAOs.

As such, the CSCC urges the Standards Development Organization to proceed with caution and to reconsider its recent commitment to a certification proposal. As evidenced by NTCA's comments, which were submitted under separate cover, an ISAO certification regime – whether via a self-certification model or as directed by a third-party – implicates significant resources, and thereby threatens to increase the barriers to entry and deter participation within the ISAO model, particularly from smaller, more resource-constrained organizations within the ISAO community.

Indeed, the primary objective of Executive Order 13691, establishing the ISAO Standards Development Organization was to encourage and facilitate the formation of ISAOs to serve communities that are perceived to be excluded from the existing Information Sharing and Analysis Center (ISAC) model. Specifically, it has been mentioned that the goal is to make it easier to establish information sharing forums at local or regional levels, or for non-critical infrastructure sectors. As such, the ISAO Standards Development Organization should seek to be as inclusive as possible, encouraging the participation of a wide variety of organizations and stakeholders within the ISAO community. Unfortunately, the certification proposal only seeks to introduce a level of complexity into the marketplace, and as with any venture, the more complicated something is, the lower the chance of success.

Further, the concept of a certification is contradictory to the notion of a voluntary information sharing structure, as outlined by the presiding Executive Order 13691. It is essential that all ISACs and ISAOs continue to have the flexibility to meet the diverse needs of their memberships.

Given these concerns, the CSCC urges the ISAO Standards Development Organization to revisit its commitment to a certification regime and renew its commitment to a standards development process that is voluntary, high-level, and private-sector driven to ensure that all interested parties can participate within the community.

In closing, we would like to commend and thank everyone in the ISAO Standards Development Organization and volunteer working groups for their accomplishments to date, and their dedication to improving the cybersecurity posture of the nation through the free flow of timely and context-rich information sharing.

Best regards,

COMMUNICATIONS SECTOR COORDINATING COUNCIL



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