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VIA EMAIL TO [cyberframework@nist.gov](mailto:cyberframework@nist.gov)

Ms. Diane Honeycutt  
National Institute of Standards and Technology  
100 Bureau Drive, Stop 8930  
Gaithersburg, MD 20899

**RE: Developing a Framework to Improve Critical Infrastructure Cybersecurity**

Ms. Honeycutt:

The Electronic Transactions Association (ETA), an international trade association representing companies who offer electronic transaction processing products and services, submits the following comments in response to the National Institute of Standards and Technology's (NIST) February 26, 2013, request for information.

As NIST proceeds with the development of a Cybersecurity Framework, the ETA recommends that NIST look to existing guidance for cybersecurity standards for critical infrastructure in the payments industry. There are already a number of keystone foundations (e.g., Special Publication 800-53, the ISO 27000 series, and PCI-DSS, to name a few) for NIST to use as guidance. The majority of payment industry participants have already incorporated one or more of these existing frameworks into their information security programs. By including similar methodologies in a new Cybersecurity Framework, NIST will provide for the effective adoption and implantation by the payments industry.

Regardless of the guidance NIST employs, the ETA stresses the importance of a standards development process specific to the payments industry. The ETA further stresses that any Cybersecurity Framework should be principle-based (as opposed to prescriptive) in order to allow for broader adoption in an ever-evolving environment.

As the Cybersecurity Framework's development proceeds, we look forward to sharing information regarding the standards, guidelines, and processes unique to the payments industry.

Respectfully submitted,

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