

Comment Submission Form

Electricity Subsector Cybersecurity Risk Management Process Guideline

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No.	Reference Number			Comment
	Section	Page	Line	
<i>For general/global comments please note GENERAL in the column 'Section' and leave 'Page' and 'Line' columns blank</i>				
1	General			The Telecommunications Industry Association (TIA) is pleased to provide comments on the Electricity Subsector Cybersecurity Risk Management Process Guidelines (RMP Guidelines) produced by the Department of Energy (DOE), the National Institute of Standards and Technology (NIST) and the North American Electric Reliability Corporation (NERC). TIA represents the global information and communications technology industry through standards development, advocacy, tradeshow, business opportunities and market intelligence. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite and unified communications. TIA's 600 member companies' products and services empower communications in every industry and market, including the electricity sector, healthcare, education, public safety, transportation, government, and the military. TIA believes modernization of the U.S. electric grid is a vital component of the nation's energy strategy aiming to reduce U.S. dependence on foreign oil, decrease carbon emissions, create jobs and help U.S. industry compete successfully in global markets for clean energy technology. Industry and government have a common goal to reduce the likelihood and impact of a cybersecurity risk event to a utility operations, assets, and individuals. TIA is committed to the successful and secure modernization of the electric grid and believes that many relevant principles learned from the ICT industry in securely modernizing other sectors that rely on the protection of assets and data apply to the modernization of the electric grid. Competition and innovation of ICTs for the electric utility sector will require a regulatory framework that is technology neutral and that harnesses voluntary standards and guidelines rather than mandated requirements. TIA believes the RMP Guidelines can be a valuable tool for both electric utilities and technology vendors as non-mandatory guiding principles to "provide a consistent and repeatable approach to managing cybersecurity risk across the electricity subsector." (RMP Guidelines, 1). TIA makes the following recommendations to emphasize the need for adherence to national voluntary guidelines and to avoid utilities mandating requirements that result in technology mandates or utility specific requirements that contract the market, which would result in a less robust, competitive and secure technology ecosystem for the electricity subsector.

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2	4	43	3-7	Guiding principles for end point protection—TIA believes non-mandatory guiding principles on end point protection may be helpful on a national and international level. Utility-specific mandates for end point protection, however, risk fracturing the market, resulting in a less competitive ecosystem that ultimately increases costs for consumers. TIA recommends that this paragraph include a sentence emphasizing the need for utilities to rely on national standards rather than developing utility specific requirements.
3	4	43	8-13	Standardized requirements for supply chain sourcing processes—Given the number of electric utilities in the U.S. market, it is important that electric utilities use a national standard for supply chain sourcing business processes. Utility specific requirements for vendor qualification, technical evaluation, commercial evaluation, and selection processes will be overly burdensome for vendors and will not result in more security. TIA recommends that this paragraph include a sentence emphasizing the need for utilities to rely on national standards rather than developing utility specific requirements.
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