



August 17, 2022

**VIA EMAIL**

Sector Governance  
Cybersecurity and Infrastructure Security Agency  
Department of Homeland Security  
245 Murray Lane  
Washington, D.C. 20528-0380

**RE: *Common Baseline Cross-Sector Cybersecurity Performance Goals***

Dear Sector Governance:

NTCA – The Rural Broadband Association (“NTCA”) respectfully submits the attached response to the draft Common Baseline v2 Cross-Sector Cybersecurity Performance Goals released June 2022 (“Goals”).

Overall, NTCA agrees that the Goals offer an important step-by-step basic guide for developing and maturing cybersecurity programs within an organization. Additionally, the Goals provide an identifiable starting point for developing a cyber posture, especially for small and mid-sized providers who often face challenges in identifying where to begin when implementing cyber practices.

NTCA encourages CISA, however, to ensure the goals are informative rather than prescriptive, consistent with approaches taken in other federal cybersecurity guidelines, to allow for each entity to adapt and implement the Goals based on the company’s needs as well as financial and technical capabilities. NTCA further encourages CISA to avoid assigning responsibilities to specific job titles but rather, to describe the expertise of the employee needed to undertake the action described. This will better allow companies to assign the task to an employee with the training and access necessary to undertake the recommendation while still accomplishing the intended result. Finally, NTCA encourages CISA to take into account steps necessary to accomplish the actions identified by the Goals to ensure that such steps can be accomplished at a baseline level.

Thank you for the opportunity to provide feedback on these Goals. Please contact the undersigned with any questions.

Sincerely,

/s/ Tamber Ray

Tamber Ray, Regulatory Counsel

Attachment: Common Baseline v2 Comment Form