



March 18, 2024

VIA EMAIL: cyber-measures@list.nist.gov

National Institute of Standards and Technology
Computer Security Division
Information Technology Laboratory
100 Bureau Drive (Mail Stop 8930)
Gaithersburg, MD 20899-8930

**RE: NIST Special Publication 800, NIST SP 800-55v1, NIST SP 800-55v2
Initial Public Draft
Measurement Guide for Information Security**

Dear NIST Computer Security Division:

NTCA – The Rural Broadband Association (“NTCA”) welcomes this opportunity to offer feedback on the initial public draft of NIST Special Publication 800-55v1 and NIST Special Publication 800-55v2, Measurement Guide for Information Security, Volumes 1 and 2 (“Measurement Guide”). NTCA represents approximately 850 community-based companies and cooperatives that provide advanced communications services in 44 states across rural America and more than 400 other firms that support or are themselves engaged in the provision of such services.

Despite the Measurement Guide’s objective of helping companies evaluate the effectiveness of cybersecurity solutions, both prospective and existing, through quantitative, qualitative, or hybrid assessments, small telecommunications providers risk being found lacking in such an evaluation due simply to their limited resources.¹ Small providers do not have the employee or time resources necessary to engage in the detailed evaluation described in the Measurement Guide, nor do they have the financial ability to hire outside consultants to perform the type of analysis described in the Measurement Guide. This is especially concerning given

¹ NTCA members have an average of 5,494 residential and 551 business fixed broadband connections in service, an average of 2,673 residential voice grade access lines in service, and an average of 903 business local exchange voice grade access lines in service. See NTCA Broadband/Internet Availability Survey Report, Dec. 2023, pp. 1, 4, available at <https://www.ntca.org/sites/default/files/documents/2023-12/2023%20Broadband%20Survey%20Report%20FINAL.pdf> The Small Business Administration, meanwhile, defines small businesses for purposes of wired and wireless communications providers as those with 1,500 or fewer employees. SBA Table of Size Standards, available at https://www.sba.gov/sites/sbagov/files/2023-03/Table%20of%20Size%20Standards_Effective%20March%2017%2C%202023%20%281%29%20%281%29_0.pdf

the statement that the methods are “designed to be used with any risk management framework” including the NIST Cybersecurity Framework 2.0 (“NIST CSF”) and NIST SP-800-161.²

As NIST is likely aware, the Federal Communications Commission (“FCC”) requires companies receiving funding through the Enhanced Alternative Connect America Cost Model – a program used almost entirely by small telecommunications providers to deploy and maintain broadband facilities in rural areas – to implement and file with the FCC cybersecurity and supply chain risk management (“C-SCRM”) plans that incorporate both the NIST CSF and NIST SP-800-161.³ The National Telecommunications and Information Administration has nearly identical requirements for companies applying for Broadband Equity Access and Deployment grants.⁴ If the Measurement Guide expressly states that the techniques described therein are to be used in coordination with the NIST CSF and NIST SP-800-161, without clear affirmation, small telecommunications providers could soon find themselves required by federal agencies to incorporate the Measurement Guide as well into their C-SCRM plans – and possibly found to be lacking if their evaluations were compared to evaluations undertaken by large providers. In this regard, the Measurement Guide would be poised not to help smaller providers, but rather to place them in a compliance trap due to nothing more than the fact that they are being compared to multi-national corporations in how they approach cybersecurity matters.

The NIST CSF was carefully written to be scalable and provides clear examples of how companies can move from existing cybersecurity levels to more enhanced levels. Furthermore, the NIST CSF has taken significant strides to account for small entities’ limited resources as demonstrated by the NIST CSF 2.0: Small Business Quick-Start Guide.⁵ Accordingly, small telecommunications providers especially would benefit from not expanding the scope of guidelines they must adhere to, or to face the risk of being found lacking in their cybersecurity efforts simply by virtue of comparison to some of the largest operators globally. Accordingly, while NTCA supports NIST’s intention of providing “a flexible guide to the development and selection of information security measures at the organization, mission/ business, and system levels to identify the success of in-place policies, procedures, and controls,”⁶ the Measurement Guide should make clear that the measures described are not to be interpreted as one size fits all, or to be taken on separate from or in addition to the NIST CSF.

² NIST Special Publication (SP) 800-55, Measurement Guide for Information Security, Volume 1 – Identifying and Selecting Measures, p. 1, Section 1.2 (“NIST Measurement Guide”).

³ See Connect America Fund: A National Broadband Plan for Our Future High-Cost Universal Service Support, *Report and Order, Notice of Proposed Rulemaking, and Notice of Inquiry*, WC Docket No. 10-90, FCC 23-60 (rel. July 24, 2023), at ¶ 111.

⁴ See Notice of Funding Opportunity, Broadband Equity, Access and Deployment Program, Executive Summary, p. 70, available at <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf>.

⁵ NIST Special Publication, NIST SP 1300, <https://doi.org/10.6028/NIST.SP.1300>, available at <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.1300.pdf>.

⁶ NIST Measurement Guide at Section 1.1.

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Thank you for the opportunity to engage with NIST on this initial public draft of the Measurement Guide. Please contact the undersigned if you have any questions.

Sincerely,

/s/ Michael Romano

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Tamber Ray

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