

November 30, 2017

Greg White  
Executive Director  
ISAO Standards Organization

Re: ISAO 200-1 *Foundational Services and Capabilities v0.1*

Dear Dr. White:

NTCA–The Rural Broadband Association (NTCA) submits the following comments in regarding Information Sharing and Analysis Organization (ISAO) 200-1 *Foundational Services and Capabilities v0.1*, released on October 30, 2017. Before offering its comments, NTCA would like to recognize the substantial contributions of the standards working groups that have supported the development of the draft guidelines.

Unfortunately, NTCA remains concerned about the overall direction of the ISAO Standards Organization (SO). *Executive Order 13691–Promoting Private Sector Cybersecurity Information Sharing* stresses the development of an inclusive ISAO structure that is flexible and scalable for organizations of all sizes and resources. As such, NTCA urges the SO to revisit the current draft of ISAO 200-1 to ensure that all interested parties can participate. More specifically, the SO should refrain from creating guidelines that are overly prescriptive and burdensome. In addition, NTCA urges the SO to revisit its recent commitment to a certification regime as it may serve to deter participation from smaller, more resource-constrained organizations, and/or increase the barriers to entry and participation in the ISAO community.

According to Executive Order, the mission of the SO is to develop “baseline capabilities that ISAOs under this order should possess and be able to demonstrate.”<sup>1</sup> It is noteworthy that the Executive Order specifically uses the term *baseline capabilities*. Organizations will need and welcome fundamental guidance with respect to setting up an ISAO’s operations. But they require guidance rather than prescription – they need to know what “baseline capabilities” are important in providing a foundation for information sharing. However, not all industry participants will desire to offer sophisticated capabilities and services at the forefront of the ISAO’s inception. Instead, it is quite accurate to say that some ISAOs will be formed on a very informal basis for the purposes of permitting and promoting sharing among entities that might otherwise not do so.

Previous ISAO documents have recognized these precepts, including *ISAO 100-2 Guidelines for Establishing an ISAO*, which affirms, “[f]oundational services and capabilities are generally considered baseline services for most ISAOs, but are *established based on the needs of its members*.”<sup>2</sup> An ISAO “does not need to provide all of the foundational services or capabilities enumerated hereafter to be considered an ISAO.”<sup>3</sup>

Unfortunately, the draft of 200-1 is more prescriptive and restrictive. From a macro perspective, the draft of 200-1 extends far beyond its mission, “a comprehensive overview of the *foundational* services and capabilities of an ISAO.”<sup>4</sup> Rather, 200-1 highlights various capabilities that infer a level of sophistication

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<sup>1</sup> Executive Order 13691, Section 3: ISAO Standards Organization, <https://www.whitehouse.gov/the-press-office/2015/02/13/executive-order-promoting-private-sector-cybersecurity-information-shari> (Executive Order 13691).

<sup>2</sup> *ISAO 100-2 Guidelines for Establishing an ISAO*, Appendix A (emphasis added).

<sup>3</sup> *Id.*

<sup>4</sup> *ISAO 200-1 Foundational Services and Capabilities v0.1*, rel. October 30, 2017, Line 22 (emphasis added).

that may not be present, required, or even desired by an ISAO in a foundational stage of development, and further implies that ISAOs need to be formal groups with established governance structures. As such, the draft of 200-1 may (albeit inadvertently) exclude small businesses from participating in the ISAO development process – an important and perhaps vital population that the Executive Order sought to engage in the nation’s information sharing ecosystem through the ISAO model.

For instance, surveying members and analyzing information are discussed in-depth within the draft of 200-1 as “foundational capabilities,”<sup>5</sup> but this is in direct juxtaposition to previous SO documents which (1) provide flexibility for ISAOs to select the capabilities which suit their members’ needs, and (2) defines these specific capabilities much more broadly.<sup>6</sup> For instance, regarding analysis, ISAO 100-2 broadly defines a foundational analytical capability as follows: “Providing a forum for members to discuss and identify common issues and trends.”<sup>7</sup> This statement conflicts with the comprehensive analytical capabilities put forth as foundational requirements in the draft of 200-1, Section 5.

Further, although not specifically contemplated within the draft 200-1 v0.1, the SO recently introduced the idea of a self- and/or third-party certification regime.<sup>8</sup> The current foundational capabilities draft is increasingly problematic when it may serve as a guideline for certification. By enacting a certification regime that is thereby tied to lofty minimum requirements, the SO would dramatically increase the barriers to entry and participation, thereby reducing the operational viability of the ISAO model for smaller, resource-constrained organizations. Certification, even self-certification, will implicate significant resources. Further, this approach contradicts Executive Order 13691, which provided the legal basis and direction for the ISAO initiative and did not contemplate the use of a certification as a requirement for voluntary ISAO participation. NTCA urges the SO to revisit the concept of a certification regime. At a minimum, if there is going to be an ISAO certification developed, it should be voluntary, high-level, and private-sector driven. Certification should only serve a fundamental, basic purpose of ensuring organizations self-identify as an ISAO and express a commitment to cyber threat information sharing and analysis.

To provide context for these recommendations, NTCA represents nearly 900 small, independent telecommunications providers. NTCA’s members operate in the most sparsely populated and highest-cost rural areas of the country. In the face of substantial economic and geographic challenges, NTCA’s members are full-service voice and broadband providers, and many also provide wireless, satellite, video, cloud computing, and/or other competitive services. Rural providers are a critical link in the nation’s telecommunications network, serving 40% of America’s landmass, but less than 5% of the population. NTCA’s members vary tremendously in size; however, the average company employs 27 staff, and has annual revenue of between \$1 million and \$5 million.

Although NTCA’s members have fewer financial resources and personnel than their larger peers, they are no less committed to operating advanced and secure telecommunications networks, and no less interested in protecting those networks and their users. Cyber-threat intelligence can be a critical input into service providers’ cybersecurity risk management plans. However, not all communications companies have the resources to

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<sup>5</sup> *Id.*, See Section 3 and Section 5.

<sup>6</sup> See *ISAO 100-2*, Appendix A.

<sup>7</sup> *Id.*

<sup>8</sup> *ISAO Standards Organization Proposes Voluntary Certification Program Addressing Future Needs of the of the ISAO Ecosystem*, rel. November 6, 2017: <https://www.isao.org/news-updates/isao-standards-organization-proposes-voluntary-certification-program-addressing-future-needs-of-the-isao-ecosystem/>

participate within the existing Information Sharing and Analysis Center (ISAC) structure; rather, some small telecommunications providers may find that an alternative cyber-threat information sharing strategy better meets their needs. Of import, rural telecommunications providers have existing, trusted relationships with their industry peers and across sector lines. As such, it is common for rural telco executives and technicians to collaborate with their peers – whether that is the neighboring independent telecommunications providers, or a similarly situated telco across state or regional boundaries.

Given this background, NTCA appreciates the Administration’s efforts to create a “more flexible approach to self-organized information sharing activities amongst communities of interest such as small businesses across sectors...”<sup>9</sup> ISAOs may be “organized on the basis of sector, sub-sector, region, or any other affinity” and may be formed as for-profit or non-profit entities.<sup>10</sup> Accordingly, “ISAOs will vary in terms of size, objectives, and capabilities,”<sup>11</sup> and “[s]ome ISAOs may be *formed informally and may have little or no desire to collect and analyze information in near real-time for its members,*”<sup>12</sup> while others may desire to offer near real-time information analysis and dissemination and/or other advanced capabilities. However, “[t]he goal of the ISAO SO is to be as inclusive as possible in finding a place for an individual or organization wishing to be part of the overall information sharing effort.”<sup>13</sup>

Once again, NTCA urges the SO to review the current ISAO 200-1 v0.1 draft with these precepts in mind. Consistent with these macro recommendations, the association also offers specific feedback embedded within the draft of 200-1, for ease of reference and review for the working group members. Further, NTCA urges the SO to revisit its commitment to a certification regime to ensure that smaller, more resource-constrained organizations can participate in the ISAO community.

Thank you in advance for your consideration and review. NTCA looks forward to further engaging with the SO as it seeks to refine the draft standards.

Regards,

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<sup>9</sup> *Frequently Asked Questions about ISAOs*, Department of Homeland Security, <https://www.dhs.gov/isao-faq>.

<sup>10</sup> Executive Order 13691, Section 3; ISAO 100-1, Section 2: Introduction.

<sup>11</sup> ISAO 100-1 v0.1, Section 2: Introduction.

<sup>12</sup> *Id.* (emphasis added).

<sup>13</sup> *Id.*