

Advocacy Points out Small Business Concerns Regarding the Preliminary Cybersecurity Framework

On December 16, 2013, the Office of Advocacy submitted formal comments to the United States Department of Commerce, National Institute of Standards (NIST) regarding its Preliminary Cybersecurity Framework, published on October 29, 2013 in the Federal Register. A copy of Advocacy's comment letter may be accessed at <http://www.sba.gov/advocacy/816>.

President Obama on February 12, 2013, signed Executive Order 13636, "Improving Critical Infrastructure Cybersecurity." The Executive Order placed primary responsibility on NIST to develop a cybersecurity framework.

According to one report, in the first three months of 2013 alone, there were over one billion Internet-based cyber attacks. Forty percent were against small businesses. These numbers mean that there were more than 51 cyber attacks on small business every second.

The Office of Advocacy letter identifies the following four areas of concern with the preliminary cybersecurity framework:

- **Cost.** Small businesses generally operate on very thin margins and they are concerned with cost factors that do not directly contribute to the cost of production. The cost of implementation and maintenance of a cybersecurity system are big concerns.
- **Compliance.** The preliminary framework is presented as voluntary but small business' experience is that many voluntary programs have become mandatory.
- **Enforcement.** Small businesses who are victims of cyber attacks would prefer that for this preliminary framework to flow down to the local law enforcement units. They believe that without a strong enforcement component, the risk aversion model does not work.
- **Education.** There are nearly 28 million small businesses in the United States. This vast array of diversity requires cybersecurity to become institutionalized into the fabric of business formation. Education is the best model to achieve awareness of the importance of cybersecurity.

For more information, visit Advocacy's web page at <http://www.sba.gov/advocacy/816>, or contact Major I. Clark, III at (202) 205-77150 or major.clark@sba.gov.