

VIA ELECTRONIC SUBMISSION: securityRFC2015@ntia.doc.gov

May 12, 2015

National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Room 4725  
Attn: Cybersecurity RFC 2015  
Washington, DC 20230  
Email: securityRFC2015@ntia.doc.gov

**Re: Response to the National Telecommunications and Information Administration's Request for Public Comment, Docket No. 150312253-5253-01, Stakeholder Engagement on Cybersecurity in the Digital Ecosystem**

To Whom It May Concern:

EDUCAUSE respectfully submits these comments to the National Telecommunications and Information Administration (NTIA) in response to the above-referenced request for comment (RFC), *Stakeholder Engagement on Cybersecurity in the Digital Ecosystem*.

EDUCAUSE is a non-profit association and the foremost community of information technology (IT) leaders and professionals committed to advancing higher education. Our membership includes over 2,000 colleges and universities, over 300 corporations serving higher education IT, and dozens of other associations, state and federal agencies, system offices, and not-for-profit organizations. EDUCAUSE strives to support IT professionals and the further advancement of IT in higher education through analysis, advocacy, community/network building, professional development, and knowledge creation.

The higher education IT sector that EDUCAUSE represents does not fall under the critical infrastructure designation. Thus, the desire of the Internet Policy Task Force (IPTF) to support multi-stakeholder engagement on cybersecurity outside of the critical infrastructure space resonates with our members.

Our community has long engaged in multi-stakeholder collaboration on cybersecurity issues. Higher education IT leaders and information security professionals consistently work together to advance the “principles, practices, and the voluntary application of policies and existing standards” called for in the RFC. In July 2000, EDUCAUSE and Internet2 launched the Computer and Network Security Task Force to convene and support community efforts to meet cybersecurity challenges. Now known as the Higher

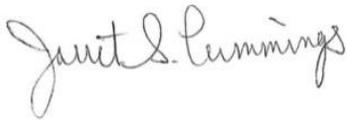
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Education Information Security Council (HEISC), this member-led body continues to extend and refine the *Information Security Guide: Effective Practices and Solutions for Higher Education* ([www.educause.edu/security/guide](http://www.educause.edu/security/guide)). First developed in 2003, the *Guide* is a comprehensive resource for implementing effective cybersecurity policies and practices at colleges and universities. It was created collaboratively by cybersecurity professionals responsible for securing data and infrastructure at our nation's higher education institutions. That same community of professionals maintains it to this day.

The *Guide* reflects the key areas that those professionals would consider central to the questions raised in the RFC. We believe it highlights our community's perspective on the areas' relative importance for multi-stakeholder exploration as the RFC describes. In addition, EDUCAUSE recently identified the top three strategic information security issues in higher education (<http://www.educause.edu/ero/article/top-3-strategic-information-security-issues>). These issues indicate that the key concerns for our community, and possibly for others, stem from cybersecurity strategy development and stakeholder awareness, not necessarily the specific attacks or technical issues referenced by the RFC. The development of security policies for mobile and cloud resources is also identified as a top strategic consideration for higher education information security. Since that topic relates to numerous examples presented in the RFC, the IPTF might consider it as the initial issue for a multi-stakeholder process to address.

Regardless of the starting point, we would encourage the IPTF to include higher education information security practitioner professionals as represented by HEISC and EDUCAUSE in the process. Our community has a considerable, well-organized base of knowledge and experience to contribute to the effort. We would appreciate the opportunity to share our community's expertise as part of a multi-stakeholder process. We would also be happy to help the IPTF to connect with subject matter experts from our community. Thank you for your consideration.

Sincerely,



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