

Consideration of Comments on Initial Ballot — CIP-006-1a Requirement R4 for US Army (Project 2008-15)

Summary Consideration: Most balloters who submitted a comment were concerned that the existing standard does not require logging the time of egress and indicated this revision would improve the requirement. The drafting team agrees with these balloters and will share these comments with the drafting team working on revisions to the CIP-002-1 through CIP-009-1 standards.

Voter	Entity	Segment	Vote	Comment
Kirit S. Shah	Ameren Services	1	Negative	We believe that logging and monitoring should be for both "in and Out".
Mark Peters	Ameren Services	3	Negative	
Response: The interpretation can only address the requirement as currently written. Changes to the requirement, such as the inclusion of egress logging and monitoring, must be addressed via the standards development process. Several balloters expressed the same concern, and we will forward these comments to the drafting team that is working on revisions to the CIP standards.				
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy supports the interpretation of Requirement 4 of CIP-006. We offer the following suggestion regarding the proposed answer to the first question. In the answer, the team wrote "No, monitoring and logging of access are only required for ingress at this time." Although we agree that monitoring and logging is only required for ingress, the phrase "at this time" may imply that the requirement is not adequate as written and may need to be changed in the future. We feel that the interpretation should not imply the need for any changes to a requirement and suggest the team remove the phrase "at this time" from the interpretation.
Joanne Kathleen Borrell	FirstEnergy Solutions	3	Affirmative	
Kenneth Dresner	FirstEnergy Solutions	5	Affirmative	
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	
Response: The use of "at this time" reflects that the interpretation can only address the requirement as currently written.				
Roy D. McCoy	Electric Reliability Council of Texas, Inc.	2	Abstain	ERCOT recognizes that the CIP002-009 Version 1 Stds as written do NOT adequately address this area and we strongly recommend this matter be turned over to the Project CSO 706 Standards Drafting Team for resolution with their planned
Kent Saathoff	Electric Reliability Council of	10	Negative	

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	Texas, Inc.			Version 3 of the Cyber Security CIP Stds. These changes should be reviewed and approved consistent with NERC's formal Standards Development Process. ERCOT Security recognizes that CSO 706 STD team is currently focused on Version 2 changes with insufficient time to address this issue before the FERC deadline of July 2009. ERCOT recommends the SDT subsequently consider this matter (along with other FERC-directed changes) as part of the planned Version 3 of the Cyber Security Standards with changes to CIP-006-3/R4. ERCOT recommends that CIP-006/R4 be changed to include a requirement to log and monitor egress (as well as ingress) from protected areas containing Critical Assets and Critical Cyber Assets as defined in NERC CIP-002. Industry Best Security practices (ISO-27002 and NIST SP 800-53, Rev 2) specify that both ingress and egress monitoring should be performed for individuals entering and exiting areas which contain high-value, mission-critical cyber assets.
Response: Several balloters expressed the same concern, and we will forward these comments to the drafting team that is working on revisions to the CIP standards.				
Donald E. Nelson	Commonwealth of Massachusetts Department of Public Utilities	9	Affirmative	The revision of this standard should reconsider the logging of the total time an individual has spent in a cyber area by considering logging "departure" without creating deterrents to emergency exits and evacuations.
Response: Several balloters expressed the same concern, and we will forward these comments to the drafting team that is working on revisions to the CIP standards.				
Guy Zito	Northeast Power Coordinating Council, Inc.	10	Affirmative	NPCC would like future revisions to this standard to consider the implications of a requirement to track time spent within a critical cyber area to be recorded by logging the time a person leaves the area.
Response: Several balloters expressed the same concern, and we will forward these comments to the drafting team that is working on revisions to the CIP standards.				

