

July 28, 2023

Ms. Kemba Walden
National Cyber Director (Acting)
Office of the National Cyber Director
Executive Office of the President
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Re: Request for Information on Cybersecurity Regulatory Harmonization

Dear Director Walden:

On behalf of businesses of all sizes and across all industries in the U.S., we welcome the Request for Information on Cybersecurity and Regulatory Harmonization (RFI) published by the Office of the National Cyber Director (ONCD) on July 19, 2023. For the reasons set forth below, we respectfully request that ONCD extend the RFI comment period by an additional 60 days.

Our organizations represent a wide range of members that meet multiple regulatory requirements domestically and internationally. Many of these members are keenly interested in responding to the RFI.

The RFI asks ten detailed questions, with nearly 60 sub-questions seeking input on federal, state, local, tribal, international, and independent agency cybersecurity regulations that may conflict with each other, are duplicative, or are overly burdensome. Collecting and organizing the data necessary to respond to the RFI's questions is a significant undertaking.

We believe the requested extension would serve the interests of ONCD and ensure it receives more comprehensive, actionable, and impactful comments.

Thank you for your consideration.

Sincerely,

Agricultural Retailers Association

American Chemistry Council

Airlines for America

American Council of Life Insurers

Airports Council International – North America

American Fuel & Petrochemical Manufacturers

Association of American Railroads

American Gas Association

American Bankers Association

American Petroleum Institute

American Property Casualty Insurance
Association

Bank Policy Institute

BSA | The Software Alliance

Edison Electric Institute

The Fertilizer Institute

Information Technology Industry Council

Internet Security Alliance

Interstate Natural Gas Association of
America

National Association of Chemical
Distributors

National Association of Mutual Insurance
Companies

National Electrical Manufacturers
Association

NTCA - The Rural Broadband Association

Securities Industry and Financial Markets
Association

Security Industry Association

U.S. Chamber of Commerce

Utilities Technology Council