



### **Transmitter's Comments on IMO's Cyber Security Standard (June 3, 2004)**

- 1204 and 1209 is specified but 1203 is not. 1203 is predecessor to 1204. We recommend adding 1203.
- Part 2, 1214, header describes incidents but body describes testing. Is the plan to include testing?
- Part 4, Non-compliance Level 1 2102 is less stringent than NERC in that it states "up to date" vice NERC's 90 days. Is this intentional?
- Part 4, Non-compliance Level 1 1204 is more stringent than NERC in that it states every 90 days vice NERC's annually or within 90 days of changes. Is this intentional?
- Part 4, Non-compliance Level 1 1209 is more stringent than NERC in that it disallows a gap of any time period vice NERC's 1 or 7 days. Is this intentional?
- Part 4, Non-compliance Level 1 1212 is specifies that policies are to be written, but not necessarily implemented. Is this intentional?
- Part 4 Standard "System management" is not 1214 but 1212
- Part 4 Electronic Incident Response actions should be added ? It is in part 2 and 3
- There are several correlation inconsistencies among (1) Part 2 Standard, (2) Part 3 Measures, (3) Part 4 Certification of compliance Full 100% compliance, (5). Part 4 Certification of compliance non-compliance Level 1 (6) Part 4 Certification of compliance non-compliance Level 4. We recommend that these six be very carefully reviewed to ensure no inconsistency, including in clarity/detail. Alternatively, and preferably, we recommend that these 6 be merged so that each standard is described / measured and its compliance assessed, before the next standard is addressed.