From: Arthur K. Gamboa
To: PRAINFO
Subject: Comment: "FFIEC Cybersecurity Assessment Tool,"
Date: Monday, September 21, 2015 6:27:42 PM

Hello,

I would like to make a comment on the FFIEC Cyber security assessment tool. Currently I feel over all it is looking like it will be pretty good. However there is one major flaw I find with it. It specifically calls out "open source software" However most major InfoSec products (SIEM, Firewalls, IPS, ETC), Storage area network products, Networking products, VMWare products ...I can go on for a really long time. All of these examples contain open source software components. Most appliance based devices run some form of the Linux operating system which is also open source.

Open source software is not any more of a security risk than closed source software. Running random software of any kind (open source or closed) from the internet on the other hand is a security risk.

I would be happy to discuss this in more detail over the phone if you would like to contact me my cell number is 406-381-8600.

Thanks

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