

From: [Steven L. Petersen](#)
To: [PRAINFO](#)
Subject: Comment: FFIEC Cybersecurity Assessment Tool
Date: Monday, September 21, 2015 7:02:22 PM

To whom it may concern,

I am writing to add my comments and to take issue with the inclusion of Open Source Software (OSS) as a determination of risk. On your own website (<https://www.ffiec.gov/press/pr102104.htm>) you made the statement in 2004 that Free and Open Source Software (FOSS) "does not pose risks that are fundamentally different from risks presented by proprietary or self-developed software". By using the blanket term "Open Source Software" you are blackballing truly useful and secure products while giving anyone reliant upon this assessment a dangerous false sense of security. Every product; open, free or paid must be evaluated on its own.

For example; Java and Flash are free but not open source. A quick search will show you a history of vulnerabilities related to them. While Microsoft, whose code is private, is constantly being hounded by 0 day exploits. (Compromises found by 3rd parties.) In fact, our company uses several vendors, well known within the industry, whose products do not support the latest browsers and in fact require default security permissions be greatly lowered in order for them to work. But according to your assessment tool, they would be considered perfectly fine.

I could continue on, but my point is this; each product must be evaluated individually based upon its own programming merit. To take a segment of software and arbitrarily cast it out is ill-informed at best and contrary to any kind of legitimate sound security advice.

Best Regards,

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