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Submitted via: www.regulations.gov

Commandant (CG-FAC)
Chief, Office of Port and Facility Compliance
U.S. Coast Guard, Stop 7501
2703 Martin Luther King Jr. Ave. SE
Washington, DC. 20593-7501

Re: Navigation and Vessel Inspection Circular (NVIC) 05-17; Guidelines for Addressing
Cyber Risks at Maritime Transportation Security Act (MTSA) Regulated Facilities
Docket USCG-2016-1084

Dear Captain Manning,

The International Association of Drilling Contractors (IADC) is a trade association representing the interest of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States.

The purpose of this letter is to respond to the 12 July 2017 *Federal Register* Notice (82 FR 32189) requesting comments pertaining to the draft Navigation and Vessel Inspection Circular (NVIC) 05-17; Guidelines for Addressing Cyber Risk at Maritime Transportation Security Act (MTSA) Regulated Facilities. IADC offers the following comments and recommendations.

These comments are offered without prejudice to comments that may also be addressed directly by IADC members.

IADC agrees with the comments submitted by the American Petroleum Institute (API) on 25 September 2017. IADC would take this opportunity to reinforce and amplify on the following general comments provided by API:

- “Enclosure (2) 05-17” is too prescriptive and should instead reference the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF) profiles being developed by NCCOE and MITRE for the Coast Guard with industry input.
- There is an overemphasis within “Enclosure (2) 05-17” on vulnerability mitigation and management rather than risk mitigation and management.

- Tying cybersecurity activities to MARSEC levels is tenuous and not appropriate in this document. The Coast Guard first needs to provide guidance on how they plan to implement cyber security and response to the MARSEC levels, as it does for physical security.
- The Coast Guard should reference industry guidelines and standards to meet the NVIC's cybersecurity goals, *e.g.*:
 - IADC Guidelines for Assessing and Managing Cybersecurity Risks to Drilling Assets;
 - IADC Guidelines for Cybersecurity Best Practices for Drilling Assets;
 - IADC Guidelines for Network Segmentation (under development);
 - API Recommended Practice 781 “Facility Security Plan Methodology for the Oil and Natural Gas Industries” ; and
- The NVIC must also be carefully aligned with the NIST Cybersecurity Framework (CSF) Profiles being developed for the Coast Guard by NCCOE/MITRE with industry input.
- It is unclear how the Coast Guard intends to employ/enforce the NVIC. While paragraph 1 of the NVIC states “Until specific cyber risk management regulations are promulgated, facility operators may use this document as guidance to develop and implement measures and activities for effective self-governance of cyber vulnerabilities”, it also states in paragraph 3.a that “The Coast Guard currently has the regulatory authority to instruct facilities and Outer Continental Shelf (OCS) facilities regulated under MTSA to analyze computer systems and networks for potential vulnerabilities within their required FSA and, if necessary, FSP”. If the NVIC is to be used either as the basis for proposed cyber risk management regulations, or as the basis for instruction to MTSA regulated facilities, it needs to be revised considerably, as suggested by API's detailed comments.

IADC appreciates the opportunity to provide comments and recommendations regarding this notice and ask that they be given due consideration. Should you have any questions about any portion of this correspondence, please contact me by phone at (713) 292-1945.

Sincerely,



Alan Spackman
Vice President, Policy, Government & Regulatory Affairs