

April 5, 2024

Mr. Todd Klessman  
CIRCIA Rulemaking Team Lead  
Cybersecurity Infrastructure and Security Agency  
circia@cisa.dhs.gov

**Re: Request for Extension on Cyber Incident Reporting for Critical Infrastructure Act**

Dear Mr. Klessman:

The undersigned organizations, representing diverse sectors of the economy, respectfully request the Cybersecurity Infrastructure and Security Agency (“CISA”) to extend the comment period on the Notice of Proposed Rulemaking (“NPRM”) of the Cyber Incident Reporting for Critical Infrastructure Act (“CIRCIA”) by 30 days, making comments due on July 3, 2024.

The proposed rule is extensive and intricate, reflecting the complexities inherent in addressing cybersecurity within critical infrastructure sectors. The NPRM spans nearly 500 pages. Consequently, its length and depth necessitate a comprehensive review process to ensure that all stakeholders fully understand its implications.

Additionally, given the potential impact of this rule, affecting every critical infrastructure sector, and possibly serving as a model and hub for other reporting requirements, extending the deadline for comments as requested above is both prudent and necessary. It will allow organizations to thoroughly evaluate the proposed requirements, identify potential challenges, and propose effective solutions that prioritize both security and operational continuity.

Finally, we acknowledge that this marks CISA’s first time regulating all critical infrastructure sectors through a formal rule. This regulatory action and its accompanying rulemaking process will establish a precedent for the future. Drafting and vetting this NPRM consumed well over a year for CISA to complete. Overall, we believe that extending the comment period by 30 days would promote a more informed rulemaking process, ultimately resulting in stronger rule, a better process for reporting, and a strong public-private partnership.

We appreciate your understanding and consideration of this matter, and we look forward to providing substantive comments to the CIRCIA proposed rule.

Sincerely,

The Cybersecurity Coalition  
The U.S. Chamber of Commerce  
American Bankers Association  
Alliance for Digital Innovation  
Bank Policy Institute  
National Retail Federation  
Edison Electric Institute  
National Electrical Manufacturers Association

Interstate Natural Gas Association of America  
American Petroleum Institute  
Airlines for America  
Alliance for Chemical Distribution  
Institute for Security and Technology  
American Chemistry Council  
American Short Line and Regional Railroad Association  
Cellular Telephone Industries Association  
American Foundry Society  
American Fuel & Petrochemical Manufacturers  
Association of American Railroads  
Federation of American Hospitals  
Industrial Fasteners Institute  
National Association of Mutual Insurance Companies  
Nuclear Energy Institute  
Security Industry Association  
The Fertilizer Institute  
Utilities Technology Council  
BSA | The Software Alliance

Cc: Jen Easterly, Director, CISA  
Brandon Wales, Executive Director, CISA