CACI

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April 29, 2013

Mr. Alfred Lee
Office of Policy Analysis and Development
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, D.C. 20230

Subject: CACI International Inc Response to Commerce Department Notice of Inquiry

Dear Mr. Lee:

I am pleased to provide the official response of CACI International Inc (CACI) to the March 28, 2013 Notice of Inquiry of the Department of Commerce seeking comments from industry on how the government can incentivize increased partnership with the private sector and promote other practices that will enhance American security in cyber space. We welcomed the government's recent U.S. cyber security initiatives and appreciate the opportunity to comment on the implementation of Executive Order 13636, Improving Critical Infrastructure Cybersecurity, 78 FR 13024, February 26, 2013.

Established over 50 years ago, CACI is deeply committed to U.S. national security. CACI provides information solutions and services in support of national security missions and government transformation initiatives for the Intelligence Community, Department of Defense, and other federal agencies. A member of the Fortune 1000 Largest Companies and the Russell 2000 Index, CACI supports its government partners with information solutions that safeguard our national security; support critical decision-making to counter global threats; keep our Armed Forces informed, equipped, and mission-ready, transform government to enhance the quality of services to our citizens; and modernize government to more efficiently meet national challenges.

At the outset, CACI lauds initiatives aimed at increasing cyber security partnership between the public and private sectors. We support efforts of the Department of Defense, the Department of Homeland Security and other government entities in partnering with the Defense Industrial Base to defend against cyber threats. The Critical Infrastructure Cybersecurity Program holds great promise, especially if it builds upon lessons learned from earlier cybersecurity sharing and partnership programs. In our view, the success of such programs depends largely on the extent to which both public and private participants dedicate sufficient personnel and resources to support the Program; ensure that necessary security clearances and secure lines of communication are in place; and safeguard the confidentiality of sensitive information shared in the course

of the partnership. Private sector entities must be able to share information in confidence without fear of retaliation or business repercussions. Likewise, government entities must be able to share necessary sensitive information with industry without unnecessary restrictions and with assurances that such information can be adequately protected. In order to build trust, communication among the Program's participants must be regular, candid, and fostered by the confidence that all parties will protect it from improper disclosure.

In addition to the private-public sector partnership, establishing cybersecurity standards in government contracting as suggested in Executive Order 13636, would help safeguard our national interests in cyberspace. The "duty of care" in cyberspace remains unclear, with a myriad of arguably inconsistent existing and proposed regulations and guidelines potentially implicated. CACI supports government efforts to clarify regulations and guidelines and ensure their consistency. We endorse the Professional Services Council's April 8, 2013 comments to the National Institute of Standards and Technology (NIST) (available at http://www.pscouncil.org/News2/NewsReleases/2013/PSC_Consistent_Cybersecurity_Framework_Must_Go_Ahead_of_Contracting_Provisions.aspx) and join in recommending that a NIST cybersecurity "framework" be published before any additional acquisition or agency-specific regulatory or other requirements on cybersecurity standards are promulgated.

Again, CACI greatly appreciates this opportunity to provide comments, and we thank you for considering our observations. Should you have any questions, please do not hesitate to contact me at (703) 294-4320. We would be happy to meet with you at your convenience to discuss any matters related to the Executive Order or our response to the Notice.

Sincerely,

Jake Jacoby
Executive Vice President
CACI National Solutions Group