

Public Comment Summary – NIST IR 7621r2

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This summary provides an overview of the public comment submitted on the Initial Public Draft of NIST IR 7621 Revision 2: Small Business Information Security. The submission offers expert, implementation-aware feedback designed to improve the guidance's clarity, effectiveness, and operational impact.

Distinctiveness of Submission

Dr. Alcalá's response stands out for its rare combination of regulatory fluency, institutional insight, and cross-jurisdictional perspective. Unlike vendor-driven or compliance-oriented inputs, this submission draws on over a decade of independent work in digital resilience, public policy, and cyber governance. It approaches cybersecurity guidance not only as a technical concern but as a challenge of institutional design, proportionality, and strategic adoption.

Key Strengths

- Addresses critical omissions such as vendor/third-party risks for SMEs.
- Advocates for maturity-scaled, context-sensitive guidance for diverse small businesses.
- Identifies implementation risk in checklist-style framing and proposes governance-focused reframing.
- Recommends embedded feedback loops and lightweight self-assessment models for institutional learning.
- Encourages international applicability and alignment with existing global standards.
- Proposes realistic, sectoral examples to increase clarity and usability.

Strategic Relevance

Among public comments submitted to NIST IR 7621r2, this response exemplifies systemic thinking and pragmatic application. It is not only rooted in regulatory theory but tested against real-world consultation and research work in the EU and UK. As such, it represents a unique and highly valuable policy perspective that contributes to the refinement and adoption of resilient cybersecurity guidance for SMEs.

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