



July 31, 2024

The Honorable Nancy Mace
Chair
Cybersecurity, Information Technology, and Government Innovation Subcommittee
1728 Longworth House Office Building
Washington, DC 20515

The Honorable Gerald Connolly
Ranking Member
Cybersecurity, Information Technology, and Government Innovation Subcommittee
2265 Rayburn House Office Building
Washington, DC 20515

RE: Hearing on Enhancing Cybersecurity by Eliminating Inconsistent Regulations

Dear Chair Mace and Ranking Member Connolly,

BSA | The Software alliance thanks you for convening today's hearing titled "Enhancing Cybersecurity by Eliminating Inconsistent Regulations. BSA agrees that "inconsistent and duplicative federal cybersecurity regulations issued across myriad agencies force companies to dedicate scarce manpower and resources to unnecessary compliance activities instead of cybersecurity upgrades."

BSA is the leading advocate for the enterprise technology sector. Our members are among the world's most innovative companies and help to drive digital transformation by providing the solutions that make businesses and government agencies more competitive and effective, including cybersecurity; identity, credentialing, and access management; human resources management; customer relationship management; design and modeling; collaboration and communication; data analytics, visualization, and backup; and ticketing and workflow solutions.

The Office of the National Cyber Director's Summary of the 2023 Cybersecurity Regulatory Harmonization Request for Information found that regulatory harmonization would help "to achieve better cybersecurity outcomes while lowering costs to businesses and their customers." One specific example is cyber incident reporting, for which the Department of

Homeland Security (DHS) Report to Congress on Harmonization of Cyber Incident Reporting to the Federal Government (CIRC Report), identified 52 in-effect or proposed cyber incident reporting requirements alone.

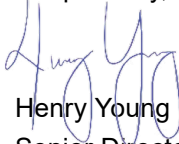
These challenges explain why Congress directed DHS to write the CIRC Report and why the US National Cybersecurity Strategy includes harmonization as a top priority. These documents recognize that harmonizing cybersecurity regulations benefits companies, their customers (including government agencies), and the resilience of the entire digital ecosystem. The benefits of harmonizing requirements include reducing complexity and cost of compliance (allowing companies to allocate resources toward security activities); growing the economy and delivering for citizens by removing barriers to entry for innovative companies and guaranteeing customers and government agencies access to best-of-breed solutions; delivering secure government services by improving procurement processes and focusing resources on an agencies' core missions.

Ultimately, harmonized regulations help make US Companies more competitive.

Despite the overwhelming consensus that harmonization creates benefits for stakeholders in the cybersecurity community, government agencies have not demonstrated a commitment to harmonizing their cybersecurity regulations. As a result, Congress should consider establishing an expert commission, led by the Office of the National Cyber Director but to include industry experts, to deliver a comprehensive report identifying all proposed and promulgated cybersecurity regulations and providing specific recommendations on how regulators should harmonize them. If regulators fail to follow these recommendations, then Congress can more effectively oversee their inaction and help build a more harmonized, secure, and resilient digital ecosystem.

BSA appreciates the opportunity to work with the Committee to harmonize cybersecurity regulations and improve the security and resilience of the digital ecosystem.

Respectfully,



Henry Young
Senior Director, Policy

CC:

The Honorable James Comer

The Honorable Jamie Raskin