



April 27, 2022

U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure Proposed Rule

Dear Chair Gensler, Commissioner Peirce, Commissioner Lee, and Commissioner Crenshaw:

I am writing this letter to strongly support and endorse the recently announced cybersecurity disclosure and governance requirements for publicly traded companies, or S7-09-22, based on substantial first-hand experience that the proposed requirements will make a meaningful difference.

My company, Axio, was formed on the basis that cybersecurity is a problem that should be understood and managed from a business and financial standpoint, versus only from a technical perspective. Our methodology and software allow for enterprises to understand their cybersecurity risk from a financial impact perspective for better prioritization and decision making. In the process, the approach successfully aligns security and risk leaders, executives, and Board of Directors around a shared understanding of the most critical enterprise risks.

Since we've been in business, Axio has continually seen major breakthroughs in terms of how our clients contend with the problem of cybersecurity:

- CEOs and Boards of Directors can finally understand cybersecurity risk and therefore provide the same oversight and governance that is provided to all other types of material enterprise risks.
- When new threats, vulnerabilities or events are made public, security leaders can very quickly model the potential impact (or lack thereof) within their own organization, and more effectively determine if any mitigating actions should be taken.
- All key enterprise constituents achieve a better understanding of how cybersecurity events can impact the business and become more effective at minimizing impact if an event should occur.
- Insurers are more receptive to enterprises that abide by this approach and will offer more sustainable and appropriately designed cyber insurance coverage.

All these outcomes differ starkly from the prevailing norm, where governance lacks, resources are misaligned, and enterprises fly blind to their most critical cybersecurity risks.

Based on Axio's experience and success in continually delivering these outcomes, translating to better protected and more resilient organizations, I have full confidence that the key components of the proposed cybersecurity rules are readily achievable and will have the desired impact on helping organizations far more effectively understand and manage cybersecurity risk.

Please do not hesitate to reach out if myself or any of my Axio colleagues can be helpful to the SEC on this matter.

Best Regards,

A handwritten signature in black ink, appearing to read "Scott Kannry".

Scott Kannry
Chief Executive Officer
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