



Via rule-comment@sec.gov

May 2, 2022

Vanessa A. Countryman
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549

**Re: Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure
(File Number S7-09-22)—Request for Comment Period Extension**

Dear Ms. Countryman:

The U.S. Chamber of Commerce urges the Securities and Exchange Commission (the SEC or the Commission) to extend by 45 days the comment period for the proposed rules on *Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure*.¹ Stakeholders require more time to review the proposed rule and develop thoughtful and substantive feedback.

The complexity of the SEC's cybersecurity rulemaking warrants additional time for at least three reasons:

- The Commission's proposed amendments include an array of reporting, risk management and strategy, and governance topics that are highly detailed and would have important impacts on publicly traded companies, investors, and U.S. economic and national security (e.g., public-private partnerships). Alone, this section covers some 40 questions for commenters.

¹ The Securities and Exchange Commission (the SEC or the Commission), "Cybersecurity Risk Management, Strategy, Governance, and Incident Disclosure," *Federal Register* (FR), March 23, 2022. <https://www.federalregister.gov/documents/2022/03/23/2022-05480/cybersecurity-risk-management-strategy-governance-and-incident-disclosure>
<https://www.sec.gov/news/press-release/2022-39>

- Many stakeholders have likely focused on the proposed amendments, yet the economic analysis portion of the rule covers many lengthy and intricate studies (some of which require purchasing) that the public deserves time to thoroughly read and formulate responses.
- In addition to this cybersecurity rulemaking, the Commission is promulgating several other rules affecting the business community that have overlapping comment periods and divide the time and attention of industry professionals. The SEC's decision to put forth multiple proposals, combined with short comment periods, raises concerns about the adequacy of the Commission's rule-writing process.

An additional 45 days would allow stakeholders appropriate time to craft well-reasoned feedback that is informed by a substantial consideration of the rulemaking and its implications for the cybersecurity of the United States and of U.S. companies.

Sincerely,

A handwritten signature in black ink that reads "Matthew J. Eggers". The signature is written in a cursive, slightly slanted style.

Matthew J. Eggers
Vice President
Cybersecurity Policy
U.S. Chamber of Commerce