

DRAFT
MEETING MINUTES
PAP WORKING GROUP
APRIL 1, 2011
CONFERENCE CALL - 10:00 am to 12:00 pm U.S. EDT

1. Welcome and Call to Order

Committee Co-Chair Dr. Marc Siegel called the meeting of the Physical Asset Protection (PAP) Working Group (WG) to order at 10:05 am U.S. EDT and welcomed the participants.

2. Roll Call

Ms. Aivelis Opicka of ASIS staff took roll and the attendance list is appended as Attachment I.

3. Approve Agenda

Co-Chair Siegel asked for any proposed modifications to the agenda, and being none the agenda was approved.

4. Approve Meeting Minutes of March 25, 2011

Co-Chair Siegel asked for any proposed modifications to the meeting minutes of March 25, 2011, and being none the minutes were approved.

5. Discussion of Comments

Co-Chair Siegel opened to resume discussion addressing the Technical Committee's comments to the February 17, 2011 PAP Standard draft at comment 77. Ms. Opicka presented the draft and comment compilation on-screen via Web conferencing for live review and edit. Co-Chair Siegel noted the highlighted editorial comments that had been reviewed by him and Co-Chair Ms. Allison Wylde for ASIS staff edit upon WG concurrence.

Discussion of comments followed. Agreement from the March 25, 2011 meeting to change the Standard's title from "*Physical Assets Protection Management System Standard*" to "*Physical Asset Protection Management System Standard*" was noted with the observation that global changes within the draft are required for consistency.

The WG accepted those comments deemed appropriate and modified proposed recommendations as necessary. Mr. Bill Moore and Mr. Gavin Wilson agreed to collaborate on proposed *Terms and Definitions* content to include *physical asset protection* and *physical security measures* definitions, as well as other proposed *Asset Protection* content. In all, 98 comments were addressed by the WG. See Attachment II for details.

Secretariat's Note: All draft edits are incorporated per the April 1, 2011 copy. An updated draft will be disseminated to the working group prior to the next meeting.

6. Open Discussion

The next meeting was noted as scheduled for April 21, 2011. The previously assigned *Annex B* content contributions will be due at a later date to be determined, with the remaining action items of March 25 being due Friday, April 15.

7. Action Items

Action items include:

- Bill Moore and Gavin Wilson to provide proposed *Asset Protection* and *Terms and Definitions* content, to include definitions of *physical asset protection* and *physical security measures*.
- ASIS staff to provide updated draft and comment compilation to the WG in advance of the next meeting.

Contributions are due to standards@asisonline.org on or before Friday, April 15, 2011.

8. Next Meeting

The next WG meeting is scheduled for Thursday, April 21, 2011 from 11:00 am to 1:00 pm U.S. EDT.

9. Adjournment

Co-Chair Siegel adjourned the meeting at 1:08 pm U.S. EDT with consensus.

Submitted by:

[Original Signed By:]

Jeanette Donovan
ASIS International
Standards & Guidelines Coordinator

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Antitrust Risk Notice: As a reminder, participation in standard and guideline committees involves the potential for antitrust concerns or risks. To avoid such concerns and risks, participants should carefully observe the "ASIS Standards Development Procedures". In addition, sensitive discussion topics such as price, specific contractual terms, etc., should be avoided. Any participant having concerns or questions regarding sensitive discussion topics should consult with their company's legal counsel, the Committee leadership or ASIS staff.

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**PAP WORKING GROUP**  
**MEETING ATTENDEES**  
**APRIL 1, 2011**

Dr. Marc H. Siegel, ASIS International, Committee Co-Chair  
Allison Wylde, London Metropolitan University Business School, Committee Co-Chair  
Dennis Blass, Children's Health System  
Nicholas Economou, Cablevision Systems Corporation  
Edward Heisler, Facility Control Systems, Inc.  
Henri Hemery, RISK&CO  
Mitchell Kemp, Cummins Filtration  
Glen Kitteringham, Kitteringham Security Group Inc.  
Richard Lavelle, Reprise Design, Inc.  
Bryan Leadbetter, Bausch & Lomb  
Alessandro Lega, Consultant  
Jeffrey Leonard, Securitas Security Services US  
Joseph McDonald, Switch Communications Group  
William Moore, Jacobs Global Buildings North America  
Gavin Wilson, BHP Billiton

**ASIS Staff Present**

Sue Carioti, Director, Standards & Guidelines  
Aivelis Opicka, Manager, Standards & Guidelines  
Jeanette Donovan, Standards & Guidelines Coordinator

**ASIS Commission Liaison Present**

Bernard Greenawalt, ASIS Commission on Standards and Guidelines

| No. | Name                         | Organization                                 | Line No. (begin) | Line No. (end) | Type of Comment | Comment (justification for change)                                                                                                                                                                                                                                                                                                                                                                                                                                                | Proposed Change                                                                                                                                                                                                                                                                                                                                                                   | Resolution            | Rationale                                                                                   |
|-----|------------------------------|----------------------------------------------|------------------|----------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|---------------------------------------------------------------------------------------------|
| 77  | Joseph McDonald, CPP, PSP    | Switch                                       | 115              | 120            | General         | Begins discussing systems and ends discussing the standard.                                                                                                                                                                                                                                                                                                                                                                                                                       | Move last sentence to end of line 114, unless "it" in line 117 is discussing the standard and not systems.                                                                                                                                                                                                                                                                        | Accept w/modification | 4/1/11                                                                                      |
| 78  | Robert Schultheiss           | Risk Decisions                               | 115              |                | Technical       | This sentence is too general and beyond the scope of this Standard                                                                                                                                                                                                                                                                                                                                                                                                                | Suggest deleting.                                                                                                                                                                                                                                                                                                                                                                 | Noted                 | 4/1/11 - Deemed not relevant.                                                               |
| 79  | Joseph McDonald, CPP, PSP    | Switch                                       | 117              | 117            | Editorial       | "It provides..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | "They provide..."                                                                                                                                                                                                                                                                                                                                                                 | Accept                | 4/1/11                                                                                      |
| 80  | Robert Schultheiss           | Risk Decisions                               | 117              |                | Editorial       | "It provides a framework for establishing, implementing, operating, monitoring, reviewing, maintaining and improving physical security systems. The Standard is applicable to organizations of all sizes across all sectors; private, public, not-for-profit and non-governmental sectors."                                                                                                                                                                                       | Suggest moving up to previous paragraph and rewriting as follows: It provides a framework for establishing, implementing, operating, monitoring, reviewing, maintaining and improving PAP systems. The Standard is applicable to organizations of all sizes across all sectors; private, public, not-for-profit and non-governmental sectors.                                     | Accept                | 4/1/11                                                                                      |
| 81  | Walter Adams                 | AECOM                                        | 117              |                | Editorial       | Clarity                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | change 'It' to 'The Standard'                                                                                                                                                                                                                                                                                                                                                     | Accept                | 4/1/11                                                                                      |
| 82  | Ron Martin, CPP              | U.S. Department of Health and Human Services | 119              |                | Editorial       | If you say Non-government you should say government                                                                                                                                                                                                                                                                                                                                                                                                                               | Add "government" after the word "and"                                                                                                                                                                                                                                                                                                                                             | Accept                | 4/1/11                                                                                      |
| 83  | Sean Ahrens                  | Aon Risk Solutions                           | 120              |                | Editorial       | Physical protection 'system' infers technology, where as a protection method could be CPTED, which is not a system, rather a philosophy. I think the terminology system, should be replaced with "control" which is more inclusive of mitigation opportunities.                                                                                                                                                                                                                   | ...Physical controls include those for the protection of both tangible                                                                                                                                                                                                                                                                                                            | Accept w/modification | 4/1/2011 - "system" is looked as IT.                                                        |
| 84  | Walter Adams                 | AECOM                                        | 122              | 124-126        | Editorial       | format                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | use upper case ti begin phrase (same comment applies in like cases throughout)                                                                                                                                                                                                                                                                                                    | Accept                | 4/1/11                                                                                      |
| 85  | Henry A. Nocella, CPP        | (DBA) Nocella Associates                     | 122              |                | Technical       | Focus on PAP, not facilities management                                                                                                                                                                                                                                                                                                                                                                                                                                           | and improve the management of its Physical Assets Protection System                                                                                                                                                                                                                                                                                                               | Accept                | 4/1/11                                                                                      |
| 86  | Robert Schultheiss           | Risk Decisions                               | 122              |                | Technical       | 'establish, implement, maintain, and improve facilities and physical security management system for the protection of its assets'                                                                                                                                                                                                                                                                                                                                                 | Suggest rewording: establish, implement, maintain, or improve a PAPMS for the protection of its assets                                                                                                                                                                                                                                                                            | Accept w/modification | 4/1/11                                                                                      |
| 87  | Sean Ahrens                  | Aon Risk Solutions                           | 123              |                | Technical       | It is widely accepted that security controls fall into three types buckets: Operational, technical and physical. As it relates to this sentence, I think it is beneficial if we carve these out for the reader.                                                                                                                                                                                                                                                                   | ...reviewing, maintaining and improving physical, operational, technical security.                                                                                                                                                                                                                                                                                                | Not accepted          | 4/1/11 - Physical security deemed to be sufficient and consistent with content.             |
| 88  | Joseph McDonald, CPP, PSP    | Switch                                       | 124              |                | Editorial       | "assure itself of its conformity..."                                                                                                                                                                                                                                                                                                                                                                                                                                              | "confirm conformity..."                                                                                                                                                                                                                                                                                                                                                           | Accept                |                                                                                             |
| 89  | Bernard D. Greenawalt, CPP   | Securitas Security Services USA, Inc.        | 124              |                | Technical       | "...policy;"                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Should this be followed by "and" or "or"?                                                                                                                                                                                                                                                                                                                                         | Accept                |                                                                                             |
| 90  | Nicholas Economou            | Cablevision Systems Corporation              | 126              |                | General         | Additional subtext following: "...c) demonstrate conformity with this Standard by: i. making a self-determination and self-declaration; or ii. seeking confirmation of its conformance by parties having an interest in the organization (such as customers); or iii. seeking confirmation of its self-declaration by a party external to the organization." Recommend inclusion of legal angle and continual improvement if offered as a standard for organization's compliance. | d) seeking to minimize legal liabilities and negligence torts. i. this standard can potentially demonstrate "duty of care" and afford safe harbor status in litigious issues. ii. the PDCA schema encourages and enhances the cooperative efforts of security professionals and top business managers in recognizing and engaging in a process of continual improvement.          | Accept w/modification | 4/1/11 - Duty of care to be added to glossary.                                              |
| 91  | Sean Ahrens                  | Aon Risk Solutions                           | 127              |                | Technical       | Consider the removal of the word "physical". I understand the need for the differentiation. However, I believe this singular term could create friction in its adaptation. I believe the word were looking for is Security Management program                                                                                                                                                                                                                                     | ...establish, implement, maintain, and improve facilities security management.                                                                                                                                                                                                                                                                                                    | No Longer Relevant    | 4/1/11 - per comments #84 and 85.                                                           |
| 92  | Sean Ahrens                  | Aon Risk Solutions                           | 128              |                | Editorial       | I believe "system" is the incorrect word, consider using "controls"                                                                                                                                                                                                                                                                                                                                                                                                               | ...controls for the protection of its assets                                                                                                                                                                                                                                                                                                                                      | No Longer Relevant    | 4/1/11 - Due to previous edits.                                                             |
| 93  | Barry R. Stanford            | STAPLES Center & Nokia Theatre & L.A. LIVE   | 131              |                |                 | Re -word                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | change generic to general                                                                                                                                                                                                                                                                                                                                                         | Not accepted          | 4/1/11 - "Generic" is commonly used in management systems and is consistent language.       |
| 94  | Edward C. Heisler, CPP, PSP  | Facility Control Systems, Inc.               | 131              |                | Editorial       | The word 'generic' seems more appropriate for Guidelines vs a Standard                                                                                                                                                                                                                                                                                                                                                                                                            | The word 'proven' provides a stronger meaning if a adjective is needed at all to describe principles.                                                                                                                                                                                                                                                                             | Not accepted          | 4/1/11 - "Generic" is commonly used in management systems and is consistent language.       |
| 95  | Bernard D. Greenawalt, CPP   | Securitas Security Services USA, Inc.        | 147              |                | Technical       | Currently blank                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Should the Protection of Assets Manual and the Physical Security Measures Guideline be included as normative references (as indicated in paragraph two of the Introduction?)                                                                                                                                                                                                      | Noted                 | 4/1/11 - Noted for bibliography.                                                            |
| 96  | Ron Martin, CPP              | U.S. Department of Health and Human Services | 147              |                | Editorial       | What about lines 103 and 104 referenced ISO standards                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                   | Noted                 | 4/1/11 - Noted for bibliography.                                                            |
| 97  | Ron Martin, CPP              | U.S. Department of Health and Human Services | 153              |                | Technical       | References to a "physical Security System" traditionally apply to an electronic system as apposed to a process type of system. This will be confusing to the implementer.                                                                                                                                                                                                                                                                                                         | Need to explain the context of "system" Recommend a representation that state: " a system for physical asset Protection"                                                                                                                                                                                                                                                          | Accept w/modification | 4/1/11                                                                                      |
| 98  | Mitchell Kemp, CPP           | Cummins Filtration                           | 153              |                | Editorial       | wording used                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | change "by removing or reducing" to "mitigating"                                                                                                                                                                                                                                                                                                                                  | Not accepted          | 4/1/11 - Proposed definition is confusing and misleading.                                   |
| 99  | Christopher Aldous, CPP, PSP | Consultant                                   | 154              |                | Technical       | Current text reads: exposure of assets to threats and hazards by developing appropriate protective measures.                                                                                                                                                                                                                                                                                                                                                                      | Suggested change to: exposure of assets to threats and hazards identified during the risk assement phase and by developing appropriate protective measures.                                                                                                                                                                                                                       | Not accepted          | 4/1/11 - Proposed change deemed to be implied within context.                               |
| 100 | Robert Schultheiss           | Risk Decisions                               | 154              |                | General         | This document is inconsistent in the use of the terms physical security system and physical asset protection system. They are not synonymous. A physical security system is only one component of a physical asset protection system. Other components include, personnel security (background checks, drug testing, etc) waste fraud and abuse controls, etc.                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                   | Noted                 | 4/1/11 - Draft to be reviewed for global changes were appropriate for consistency.          |
| 101 | Thomas Bolden                | Capital One Financial                        | 155              |                | Technical       | incorporates common risk management terms "probability and consequence" as used in ISO Guide 73:2009, Risk Management - Vocabulary; also reducing sentence length for easier reading.                                                                                                                                                                                                                                                                                             | These measures are intended to reduce the probability and consequence of a disruptive event, through prevention when possible, or through an effective response designed to maintain an agreed minimal level of performance pending full recovery.                                                                                                                                | Accept w/modification | 4/1/11 - Is consistent with new ISO Guide 73.                                               |
| 102 | Ron Martin, CPP              | U.S. Department of Health and Human Services | 159              |                | Technical       | Level of protection (LOP) is not defined. Therefore acceptable LOP cannot be determined.                                                                                                                                                                                                                                                                                                                                                                                          | Define " <b>Level of Protection (LOP)</b> " as: Level of Protection (LOP): The degree of security provided by a particular countermeasure or set of countermeasures. Levels of protection used in this Standard are Minimum, Low, Moderate, High, and Very High. Reference: U.S. Government Interagency Security Committee Physical Security Criteria Standard, Dated April 2010. | Not accepted          | 4/1/11 - Deemed to already be covered in previous sentence. Modifications made for clarity. |

| No. | Name                         | Organization                                 | Line No. (begin) | Line No. (end) | Type of Comment | Comment (justification for change)                                                                                                                                                                                                                        | Proposed Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Resolution            | Rationale                                                                                                                   |
|-----|------------------------------|----------------------------------------------|------------------|----------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 103 | Ron Martin, CPP              | U.S. Department of Health and Human Services | 159              |                | Technical       | Once defined, the process of determining the LOP can be prescribed. Therefore, more LOP context is needed.                                                                                                                                                | First the standard must categorize the facility relative importance and defined as: <b>Facility Security Level (FSL)</b> : A categorization based on the analysis of several security-related facility factors, which serves as the basis for the implementation of physical security measures specified in National and/or organizational standards. Second, <b>Baseline LOP</b> : The degree of security provided by the set of countermeasures identified in this document for each FSL which must be implemented unless a deviation (up or down) is justified by a risk assessment. <b>Necessary LOP</b> : The degree of security determined to be needed to mitigate the assessed risks at the facility. <b>Existing LOP</b> : The degree of security provided by the set of countermeasures determined to be in existence at a facility. <b>Customized LOP</b> : The final set of countermeasures developed as the result of the risk-based analytical process. Reference: U.S. Government Interagency Security Committee Physical Security Criteria Standard, Dated April 2010. | Not accepted          | 4/1/11 - Deemed to already be covered in previous sentence. Modifications made for clarity.                                 |
| 104 | Sean Ahrens                  | Aon Risk Solutions                           | 160              |                | Editorial       | Holistic change from "measures" to "controls" to more closely correlate with referenced standards and risk management philosophy.                                                                                                                         | ...developing appropriate protective controls. These controls are intended to reduce the likelihood and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Accept w/modification | 4/1/11                                                                                                                      |
| 105 | Edward C. Heister, CPP, PSP  | Facility Control Systems, Inc.               | 160              |                | Editorial       | fit-for-purpose does not ID the rationale for the selection of countermeasures                                                                                                                                                                            | at the end of the sentence, remove the period and add 'that are appropriate countermeasures to the Desing Basis Threat'.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Not accepted          | 4/1/11 - New term not used in content.                                                                                      |
| 106 | Joseph Nelson                | Iron Mountain                                | 161              |                | Editorial       | reference to "clause #5 was not clear from document format                                                                                                                                                                                                | Provide a clearer reference                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Noted                 | 4/1/11 - Noted for technical editor.                                                                                        |
| 107 | Sean Ahrens                  | Aon Risk Solutions                           | 165              |                | Editorial       | Aspects of a security protection program can include terminology, which is not reflective of the word 'system'.                                                                                                                                           | ...fit-for-purpose physical asset protection controls. The elements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Not accepted          | 4/1/11 - New term not used in content.                                                                                      |
| 108 | Loftin C. Woodiel            | Ally Financial Services                      | 165              |                | Editorial       | "Leadership and vision"                                                                                                                                                                                                                                   | "Leadership and Vision"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Accept                | 4/1/11                                                                                                                      |
| 109 | Thomas Bolden                | Capital One Financial                        | 168              |                | Editorial       | leadership is also responsible for establishing the risk appetite of the organization                                                                                                                                                                     | provides direction and the risk appetite for their organizations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Accept                | 4/1/11                                                                                                                      |
| 110 | Sean Ahrens                  | Aon Risk Solutions                           | 171              | 177            | Technical       | It is not clear if this is "overall" leadership, or specifically security management leadership. If referring to overall leadership, I believe the paragraph is incorrect. Overall leadership is concerned about one thing: Profit and shareholder value. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Not accepted          | 4/1/11 - Content deemed to be clear as is.                                                                                  |
| 111 | Pradeep Bajaj                | PRISMA                                       | 172              |                | Technical       | an explanation is required                                                                                                                                                                                                                                | It ensures that all the processes that are required to ensure safety and security of the physical assets are prepared and implemented throughout the organisation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Accept w/modification | 4/1/11                                                                                                                      |
| 112 | Ron Martin, CPP              | U.S. Department of Health and Human Services | 173              |                | Technical       | The section does not define or explain the concept of governance                                                                                                                                                                                          | Recommend: the PAP Governance process is to ensure that the strategy's management quality, soundness, and technical feasibility remain adequate and the project is ready to move forward to the next phase. The governance framework provides a guide to Project Managers, Business Owners, PAP Governance Executives, other Stakeholders, and Critical Partners throughout the life of the protection strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Not accepted          | 4/1/11 - Content deemed to be clear as is.                                                                                  |
| 113 | Thomas Bolden                | Capital One Financial                        | 175              | 176            | Editorial       | "protection of human life safety", the word safety in this sentence becomes the object of the protection. Delete "safety" from the sentence                                                                                                               | ...protection of human life as the primary concern...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Accept w/modification | 4/1/11                                                                                                                      |
| 114 | Henry A. Nocella, CPP        | (DBA) Nocella Associates                     | 175              |                | Technical       | life safety has a different connotation than human life                                                                                                                                                                                                   | ...with protection of human life as the primary concern...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Accept w/modification | 3/31/11 - Deemed editorial in nature.                                                                                       |
| 115 | Joseph Nelson                | Iron Mountain                                | 175              |                | Editorial       | Use of uncommon word "Ethos" is unnecessary                                                                                                                                                                                                               | replace the work "ethos" with the more common synonym such as "philosophy"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Accept                | 4/1/11                                                                                                                      |
| 116 | Mitchell Kemp, CPP           | Cummins Filtration                           | 176              |                | Editorial       | wording used                                                                                                                                                                                                                                              | remove " safety"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Accept w/modification | 4/1/11                                                                                                                      |
| 117 | Ron Martin, CPP              | U.S. Department of Health and Human Services | 178              |                | Editorial       | Change "needs" to "requirements" Needs and wants may not develop into requirements.                                                                                                                                                                       | Change to read: Assessing and understanding organization's asset requirements is critical to the success of PAM. Objectives of the organization are linked to requirements. Stakeholder relationships are systematically managed ensuring a balanced approach between needs/wants of the organization and other interested parties (stakeholders including, for example, employees, its supply chain, customers, suppliers, financiers, local communities and society as a whole).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Not accepted          | 4/1/11 - Proper wording utilized; "requirements" not proper within context. "Need" deemed to be appropriate and consistent. |
| 118 | Sean Ahrens                  | Aon Risk Solutions                           | 178              |                | Editorial       | Not sure that Governance is the right term here. I infer governance as part of the entire organization.                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted                 | 4/1/11 - Governance deemed proper language.                                                                                 |
| 119 | Christopher Aldous, CPP, PSP | Consultant                                   | 179              |                | Editorial       | Current text: expectations is critical                                                                                                                                                                                                                    | Suggest change to: expectations are critical                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Accept                | 4/1/11                                                                                                                      |
| 120 | Sean Ahrens                  | Aon Risk Solutions                           | 179              |                |                 | The terminology "asset" should be replaced with "programs"                                                                                                                                                                                                | ...Physical security programs are viewed as part of an overall good                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Not accepted          | 4/1/11 - "Assets" deemed to be properly used in context.                                                                    |
| 121 | Sean Ahrens                  | Aon Risk Solutions                           | 182              |                | Technical       | The following statement seems logical, but should be confirmed. "It is seen as an integral part of enterprise-wide risk management"                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted                 | 4/1/11                                                                                                                      |
| 122 | Sean Ahrens                  | Aon Risk Solutions                           | 184              |                | Editorial       | Word use                                                                                                                                                                                                                                                  | ...understanding <u>the</u> organization's assets                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Accept                | 4/1/11                                                                                                                      |
| 123 | Sean Ahrens                  | Aon Risk Solutions                           | 185              |                | Editorial       | Word use                                                                                                                                                                                                                                                  | ...are linked to <u>its</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/1/11                                                                                                                      |
| 124 | Loftin C. Woodiel            | Ally Financial Services                      | 185              |                | Editorial       | "Systems approach"                                                                                                                                                                                                                                        | "Systems Approach"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Accept                | 4/1/11                                                                                                                      |
| 125 | Jean-Marc Debon, CPP         | Montreal International Airports              | 186              |                | Editorial       | "interactive"                                                                                                                                                                                                                                             | "Interactive"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Accept                | 4/1/11                                                                                                                      |
| 126 | Jean-Marc Debon, CPP         | Montreal International Airports              | 187              |                | Editorial       | "contribute"                                                                                                                                                                                                                                              | "contributes"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Accept                | 4/1/11                                                                                                                      |
| 127 | Sean Ahrens                  | Aon Risk Solutions                           | 187              |                | Editorial       | Word use                                                                                                                                                                                                                                                  | ...balanced approach between <u>the</u> needs of the organization                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Accept                | 4/1/11                                                                                                                      |
| 128 | Thomas Bolden                | Capital One Financial                        | 189              | 191            | Editorial       | "treated as such as an entirety" is confusing                                                                                                                                                                                                             | Component parts of a system can best be understood in their entirety in the context of relationships and interdependencies with each other, rather than in isolation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Accept                | 4/1/11                                                                                                                      |
| 129 | Sean Ahrens                  | Aon Risk Solutions                           | 191              |                | Editorial       | Wrong word - "dimensional"                                                                                                                                                                                                                                | ...protection is a multi- process iterative approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Accept                | 4/1/11                                                                                                                      |
| 130 | Loftin C. Woodiel            | Ally Financial Services                      | 192              |                | Editorial       | "Adaptability and flexibility"                                                                                                                                                                                                                            | "Adaptability and flexibility"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Accept                | 4/1/11                                                                                                                      |
| 131 | Joseph McDonald, CPP, PSP    | Switch                                       | 193              |                | Editorial       | "...operate in situations where..." constancy is a better descriptor than situation                                                                                                                                                                       | "...operate where..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Accept                | 4/1/11                                                                                                                      |
| 132 | Edward C. Heister, CPP, PSP  | Facility Control Systems, Inc.               | 196              |                | General         | Not sure how an organization does "environment scanning"                                                                                                                                                                                                  | Can a reference or methodology be recommended?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Withdrawn             | 4/1/11 - Withdrawn by commenter.                                                                                            |
| 133 | Christopher Aldous, CPP, PSP | Consultant                                   | 197              |                | Technical       | Current text: Physical asset protection management system should be seen as a management framework                                                                                                                                                        | Suggest change to: Physical asset protection management system enable security to remain current and focussed to the needs of the business and should be seen as a management framework                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Not accepted          | 4/1/11 - Content deemed to be clear as is.                                                                                  |
| 134 | Sean Ahrens                  | Aon Risk Solutions                           | 199              |                | Editorial       | Wrong word -"scanning", replace with "monitoring"                                                                                                                                                                                                         | ...Organizations need to conduct on-going environmental monitoring                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Accept                | 4/1/11                                                                                                                      |
| 135 | Loftin C. Woodiel            | Ally Financial Services                      | 200              |                | Editorial       | "Managing uncertainty"                                                                                                                                                                                                                                    | "Managing Uncertainty"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Accept                | 4/1/11                                                                                                                      |
| 136 | Sean Ahrens                  | Aon Risk Solutions                           | 201              |                | Editorial       | Adaptable infers "able"- strike "able".                                                                                                                                                                                                                   | ...Organizations need to be adaptable; and willing to evolve                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Accept                | 4/1/11                                                                                                                      |

| No. | Name                        | Organization                                 | Line No. (begin) | Line No. (end) | Type of Comment | Comment (justification for change)                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Proposed Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Resolution            | Rationale                                                                                                                                  |
|-----|-----------------------------|----------------------------------------------|------------------|----------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| 137 | Thomas Bolden               | Capital One Financial                        | 202              | 204            | Technical       | not sure how one goes about providing estimates and assumptions regarding the probability and consequence of an unknown threat. Unknown is simply unknown.                                                                                                                                                                                                                                                                                                                                           | Estimates and assumptions need to be made in analysing the probability and consequences of known threats, the vulnerability of the organization, and its assets within a changing organization.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Not accepted          | 4/1/11 - Content deemed to be clear as is.                                                                                                 |
| 138 | Thomas Bolden               | Capital One Financial                        | 202              |                | Technical       | incorporates common risk management terms "probability and consequence" as used in ISO Guide 73:2009, Risk Management - Vocabulary                                                                                                                                                                                                                                                                                                                                                                   | ...to be made in analysing the probability and...                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Not accepted          | 4/1/11 - Language consistent with new Guide 73                                                                                             |
| 139 | Sean Ahrens                 | Aon Risk Solutions                           | 206              |                | Editorial       | Inconsistent type font. Some begin with caps, others do no. Single entry, I will not repeat comment. Review entire document for applicability.                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted                 | 4/1/11 - Noted for technical editor.                                                                                                       |
| 140 | Edward C. Heisler, CPP, PSP | Facility Control Systems, Inc.               | 206              |                | General         | how does an organization catalogue 'estimates and assumptions need to be made in analysing the likelihood and consequences of threats'                                                                                                                                                                                                                                                                                                                                                               | Can a reference or methodology be recommended?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Withdrawn             | 4/1/11 - Withdrawn by commenter.                                                                                                           |
| 141 | Jim Castle                  | Corporate & Executive Solutions Ltd          | 207              |                | Technical       | 'perception' can also be described as 'awareness'                                                                                                                                                                                                                                                                                                                                                                                                                                                    | add 'awareness' to perception paragraph                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Not accepted          | 4/1/11 - "Awareness" deemed to be inherent and implied within context.                                                                     |
| 142 | Lofin C. Woodiel            | Ally Financial Services                      | 207              |                | Editorial       | "Physical Assets Protection perception"                                                                                                                                                                                                                                                                                                                                                                                                                                                              | "Physical Assets Protection Perception"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Accept                | 4/1/11                                                                                                                                     |
| 143 | Joseph McDonald, CPP, PSP   | Switch                                       | 212              |                | Editorial       | "...must be interested enough to ensure..." too familiar                                                                                                                                                                                                                                                                                                                                                                                                                                             | "... must be engaged to a degree that ensures..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Accept                | 4/1/11                                                                                                                                     |
| 144 | Edward C. Heisler, CPP, PSP | Facility Control Systems, Inc.               | 212              |                | General         | How does the PAPMS supports cultural and perception change in the organization?                                                                                                                                                                                                                                                                                                                                                                                                                      | Can a reference or methodology be recommended?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Not accepted          | 4/1/11 - Deemed to be general concepts of management systems; is not a methodology, but rather a means of looking to drive culture change. |
| 145 | Ron Martin, CPP             | U.S. Department of Health and Human Services | 215              |                | Technical       | The factual Basis for decision making does not present context for PAM decision making. Within the Organizational Resilience Maturity Model - Phased Implementation (201X), NISTIR-7385 An Analytical Approach to cost-Effective, Risk-Based Budgeting for Federal Information System Security. This decision making context should be used. <a href="http://www.asisonline.org/guidelines/committees/docs/NISTIR_7385.pdf">http://www.asisonline.org/guidelines/committees/docs/NISTIR_7385.pdf</a> | Recommend: The Analytic Hierarchy Process, (AHP) constitutes a comprehensive method of evaluation to support decisions for which both quantitative and qualitative attributes are relevant. The AHP is described in detail in ASTM Standard E 1765-02, Standard Practice for Applying Analytic Hierarchy Process (AHP) to Multiattribute Decision Analysis of Investments Related to Buildings and Building Systems. The AHP has four major features: (1) It decomposes a complex problem into its constituent elements and orders them into a "hierarchy", or classification system; (2) it uses pairwise comparisons to establish priorities among elements in each level of the hierarchy; (3) it provides a measurement theory to estimate the relative weights of the elements; and (4) it aggregates the relative weights to derive a single overall rating for each decision alternative. | Not accepted          | 4/1/11 - Proposed change deemed to be inconsistent with standards context; is not applicable and is overly prescriptive.                   |
| 146 | Sean Ahrens                 | Aon Risk Solutions                           | 216              |                | Editorial       | I believe "security" needs to be added.                                                                                                                                                                                                                                                                                                                                                                                                                                                              | ...employees understand the goals of the security management system.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Accept                | 4/1/11                                                                                                                                     |
| 147 | Sean Ahrens                 | Aon Risk Solutions                           | 217              |                | Editorial       | Word order - move "organization".                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | ...The PAPMS supports cultural and organization perception changes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Accept                | 4/1/11                                                                                                                                     |
| 148 | Edward C. Heisler, CPP, PSP | Facility Control Systems, Inc.               | 218              |                | General         | Physical asset protection management drives decision making                                                                                                                                                                                                                                                                                                                                                                                                                                          | clarification how or can a reference or methodology be recommended?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Accept w/modification | 4/1/2011 - Noted to be general concepts.                                                                                                   |
| 149 | Edgard Ansola               | Asepeyo                                      | 220              |                | Editorial       | ".... company policy."                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Which kind of company policy ? PAP policy ? Information security policy ? I suggest to specify the policy type.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Accept                | 4/1/11                                                                                                                                     |
| 150 | Joseph McDonald, CPP, PSP   | Switch                                       | 220              |                | Editorial       | "... accurate and reliable and timely..."                                                                                                                                                                                                                                                                                                                                                                                                                                                            | "...accurate, reliable and timely..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/1/11                                                                                                                                     |
| 151 | Lofin C. Woodiel            | Ally Financial Services                      | 221              |                | Editorial       | "Continuous improvement"                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | "Continuous Improvement"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Accept                | 4/1/11                                                                                                                                     |
| 152 | Sean Ahrens                 | Aon Risk Solutions                           | 223              |                | Technical       | Can be factual (loss), but can also be hypothetical (risk assessment). Consider incorporating hypothetical into the decision process. For instance the discovery of an unlocked door increases the probability of an event, but does not guarantee it will occur.                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Not accepted          | 4/1/11 - Statement is implied and covered in the standard.                                                                                 |
| 153 | Thomas Bolden               | Capital One Financial                        | 224              |                | Editorial       | findings should always be followed by recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                | The findings and recommendations of such reviews....                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Accept                | 4/1/11                                                                                                                                     |
| 154 | Sean Ahrens                 | Aon Risk Solutions                           | 226              |                | Technical       | Recording of fact based issues is a valid recommendation, however, hypothetical threats, such as those identified in a security assessment may be controlled. Consider a sentence afterwards, which annotated the control of hypothetical risks.                                                                                                                                                                                                                                                     | "Note: Where applicable, factual information may need to be controlled to minimize liability, foresee ability in the event of a occurrence. These considerations should be discussed with the representative organization legal department."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Not accepted          | 4/1/11 - Requirements section addresses sensitivity. Paragraph modified for clarity.                                                       |
| 155 | Robert Schultheiss          | Risk Decisions                               | 228              |                | Technical       | Section is redundant, covered in more depth in the following section (5.2)                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Accept                | 4/1/11 - Section 5.1 removed.                                                                                                              |
| 156 | Henry A. Nocella, CPP       | (DBA) Nocella Associates                     | 231              |                | General         | Repetitive                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Drop one or the other; repeating the same thought within a few lines                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Accept                | 4/1/11 - Section 5.1 removed.                                                                                                              |
| 157 | Joseph McDonald, CPP, PSP   | Switch                                       | 231              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Accept                | 4/1/11                                                                                                                                     |
| 158 | Joseph Nelson               | Iron Mountain                                | 231              |                | Editorial       | Use of uncommon word "Ethos" is unnecessary                                                                                                                                                                                                                                                                                                                                                                                                                                                          | replace the work "ethos" with the more common synonym such as "philosophy"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Accept w/modification | 4/1/11 - Section 5.1 removed.                                                                                                              |
| 159 | Joseph McDonald, CPP, PSP   | Switch                                       | 233              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Accept                | 4/1/11                                                                                                                                     |
| 160 | Bernard D. Greenawalt, CPP  | Securitas Security Services USA, Inc.        | 236              |                | Editorial       | "...an physical..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | "...a physical..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Accept                | 4/1/11                                                                                                                                     |
| 161 | Sean Ahrens                 | Aon Risk Solutions                           | 236              |                | Editorial       | Governance is again discussed. Is the term governance applicable to "Management acceptance"?                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Noted                 | 4/1/11 - Governance deemed to be part of the management system.                                                                            |
| 162 | Joseph McDonald, CPP, PSP   | Switch                                       | 237              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Accept                | 4/1/11                                                                                                                                     |
| 163 | Joseph McDonald, CPP, PSP   | Switch                                       | 237              |                | General         | "physical asset protection management system policy"                                                                                                                                                                                                                                                                                                                                                                                                                                                 | or is it "physical asset protection policy" per line 231 and line 255                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/1/11                                                                                                                                     |
| 164 | Jim Castle                  | Corporate & Executive Solutions Ltd          | 237              |                | Editorial       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | delete 'an' insert 'a'                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Accept                | 4/1/11                                                                                                                                     |
| 165 | Jean-Marc Debon, CPP        | Montreal International Airports              | 237              |                | Editorial       | "...an physical asset..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | "...a physical asset..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Accept                | 4/1/11                                                                                                                                     |
| 166 | Sean Ahrens                 | Aon Risk Solutions                           | 238              | 239            | Technical       | Relates to item 1 - Consider Security Management Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                | ...Top management shall demonstrate leadership with respect to the security management program by:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Accept                | 4/1/11                                                                                                                                     |
| 167 | Joseph McDonald, CPP, PSP   | Switch                                       | 238              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Accept                | 4/1/11                                                                                                                                     |
| 168 | Mitchell Kemp, CPP          | Cummins Filtration                           | 238              |                | Editorial       | wording used                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | change to 'appointment of a person' to be responsible.....                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Accept                | 4/1/11                                                                                                                                     |
| 169 | Joseph McDonald, CPP, PSP   | Switch                                       | 241              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                       |                                                                                                                                            |

| No. | Name                         | Organization                      | Line No.<br>(begin) | Line No.<br>(end) | Type of<br>Comment | Comment (justification for change)                      | Proposed Change                                                                                | Resolution               | Rationale                                                          |
|-----|------------------------------|-----------------------------------|---------------------|-------------------|--------------------|---------------------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------|--------------------------------------------------------------------|
| 170 | Joseph McDonald,<br>CPP, PSP | Switch                            | 243                 |                   | General            | "...its responsibilities under the law..."              | What law, what responsibilities?                                                               | Accept<br>w/modification | 4/1/11                                                             |
| 171 | Sean Ahrens                  | Aon Risk Solutions                | 243                 |                   | Technical          | Relates to item 1 - Consider Security Management        | ...supports the security management performance of the organization                            | Tabled                   | 4/1/11 - Proposed change is not consistent with standards context. |
| 172 | Joseph McDonald,<br>CPP, PSP | Switch                            | 245                 |                   | Editorial          | Indent does not match above                             | Match indent with Line 122                                                                     | Accept                   | 4/1/11                                                             |
| 173 | Sean Ahrens                  | Aon Risk Solutions                | 246                 |                   | Technical          | Relates to item 1 - Consider Security Management Policy | ...establishing a security management policy;                                                  | Tabled                   | 4/1/11 - Proposed change is not consistent with standards context. |
| 174 | Jeffrey S. Leonard           | Securitas Security Services<br>US | 248                 |                   | Technical          | Include time in resources that should be allocated.     | "Resources include <i>a priority allocation of time for</i> people with specialized skills..." | Accept                   | 4/1/11                                                             |