

DRAFT
MEETING MINUTES
PAP WORKING GROUP
APRIL 21, 2011
CONFERENCE CALL - 11:00 am to 1:00 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 11:05 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 April 1, 2011

Co-Chair Siegel asked for any proposed modifications to the meeting minutes of April 1, 2011. Ms. Opicka informed a change to the 4/1 meeting minutes was requested by WG member Mohamed Meddeb, who was unable to formally advise of attendance at the last meeting. With no further changes, 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 175. 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 and the WG accepted those comments deemed appropriate and modified proposed recommendations as necessary. In all, 110 comments were addressed by the WG. See Attachment II for details.

Secretariat's Note: All draft edits are incorporated per the April 21, 2011 copy. An updated draft will be disseminated to the working group prior to the next meeting.

6. Open Discussion

Due to the volume of comments, the WG determined back-to-back meeting days would be beneficial so as to expedite the comment resolution process. A meeting was scheduled for two hours each day on May 10 and 11, 2011.

7. Action Items

Action items include:

- ASIS staff to provide updated draft and comment compilation to the WG in advance of the next meeting.
- ASIS staff to consolidate Annex B contributions and distribute the consolidation to the contributors and relevant commenters for review and comment.

8. Next Meeting

The next WG meeting is scheduled for a two-day session on Tuesday, May 10 and Wednesday, May 11, 2011, from 11:00 am to 1:00 pm U.S. EDT both days.

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.

Early Patent Disclosure Notice: ASIS follows ANSI's patent policy where disclosure of relevant patented inventions at the earliest possible time in the standards development process is encouraged. Neither ASIS, the Committee, nor its Chair ensure the accuracy or completeness of any disclosure or whether any disclosure is of a patent that in fact may be essential for the use of standards under development.

**PAP WORKING GROUP**  
**MEETING ATTENDEES**  
**APRIL 21, 2011**

Dr. Marc H. Siegel, ASIS International, Committee Co-Chair  
Dennis Blass, Children's Health System  
Nicholas Economou, Cablevision Systems Corporation  
James Ellis, Principal Financial Group  
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.  
Alessandro Lega, Consultant  
Ronald Martin, US Dept of Health and Human Services  
Joseph McDonald, Switch Communications Group  
Mohamed Fadhel Meddeb, Topic Energy  
Henry Nocella, (DBA) Nocella Associates  
Russ Phillips, MMTS Group  
James Saulnier, Sprint  
Loftin Woodiel, Ally Financial Services

**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. | Line No. (begin) | Line No. (end) | Type of Comment | Comment (justification for change)                                                                                                                                             | Proposed Change                                                                                                                                              | Resolution            | Rationale                                                                              |
|-----|------------------|----------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------------------------------------------------------------|
| 175 | 248              |                | Technical       | processes are an important part of management systems as such are recommended to be added                                                                                      | add processes after 'information' and before 'and financial resources'                                                                                       | Accept                | 4/21/11                                                                                |
| 176 | 248              |                | Technical       | Add subparas (e), (f) and (g), some more points suggested fo management to address, and renumber subsequesnt remaining subparas as (h) and (i). (e) is inder column E opposite | e) Ensuring the preparation of the required processes and their implementation in the nominated departments.                                                 | Not accepted          | 4/21/11 - Proposed change was deemed to be too prescriptive.                           |
| 177 | 248              |                | Technical       | (f) is inder column E opposite                                                                                                                                                 | f) Ensuring the establishment of the procedures for periodic internal inspections and audits with the view to maintain the integrity of the physical assets. | Not accepted          | 4/21/11 - Proposed change already covered under "audits".                              |
| 178 | 248              |                | Technical       | (g) is inder column E opposite                                                                                                                                                 | g) Carrying out surprise checks/ inspections                                                                                                                 | Not accepted          | 4/21/11 - Proposed change deemed not relevent to section 5.2 on Management Commitment. |
| 179 | 249              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 180 | 251              | 252            | Technical       | Relates to item 1 - Consider Security Management Policy                                                                                                                        | ...and conforming to the security management policy                                                                                                          | Not accepted          | 4/21/11 - Proposed change already covered under "review".                              |
| 181 | 251              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 182 | 257              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 183 | 259              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 184 | 260              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 185 | 260              |                | Editorial       | too dissimilar ideas                                                                                                                                                           | split into "define the...program" and "define the scope ... and replacement;"program and                                                                     | Not accepted          | 4/21/11 - Deemed not relevant.                                                         |
| 186 | 261              |                | Technical       | Physical asset protection is not a system, it is a program                                                                                                                     | ...a) conducting management reviews of the security management program.                                                                                      | Not accepted          | 4/21/11 - Deemed not relevant.                                                         |
| 187 | 261              |                | Technical       | This line: "a) conducting management reviews of the physical asset protection management system." should be the first or second item in the presented order                    | Revise bulleted order                                                                                                                                        | Not accepted          | 4/21/11 - Current order deemed correct.                                                |
| 188 | 263              |                | Editorial       | Indent does not match above                                                                                                                                                    |                                                                                                                                                              | Accept                | 4/21/11                                                                                |
| 189 | 263              |                | Technical       | wrong order                                                                                                                                                                    | Objectives, targets and programs" should come before "... applications..." in line 261                                                                       | Accept                | 4/21/11                                                                                |
| 190 | 265              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 191 | 266              |                | Technical       | Currently identified in order as the last item, I believe this should be moved to the top "a) include a commitment to human and community life safety as the first priority;"  | Revise bulleted order                                                                                                                                        | Accept w/modification | 4/21/11                                                                                |
| 192 | 267              |                | Editorial       | reshuffle list                                                                                                                                                                 | place sub para f to the top of list                                                                                                                          | Accept w/modification | 4/21/11                                                                                |
| 193 | 267              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 194 | 269              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11                                                                                |
| 195 | 271              |                | Editorial       | replace period "...organization."                                                                                                                                              | "...organization;                                                                                                                                            | Accept                | 4/21/11                                                                                |
| 196 | 279              |                | General         | throughout section 6, should and shall are used, which is it?                                                                                                                  | change "shall" to should for consistency ??                                                                                                                  | Not accepted          | 4/21/11 - "Shall" is consistent and correct as it is a requirement.                    |
| 197 | 281              |                | General         | "...its effectiveness is..."                                                                                                                                                   | "effectiveness" needs defined "...effectiveness as a management system..."                                                                                   | Accept w/modification | 4/21/11                                                                                |
| 198 | 282              |                | Editorial       | Clause 5                                                                                                                                                                       | is that the same as Section 5?                                                                                                                               | Accept                | 4/21/11                                                                                |
| 199 | 283              |                | Technical       | 284 is just an example of what is described in283 - not another goal                                                                                                           | ...can achieve its expected outcomes (e.g., prevent undesired consequences of nonconformances)                                                               | Accept                | 4/21/11                                                                                |
| 200 | 283              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11 - Noted for technical editor review.                                           |
| 201 | 283              |                | General         | "...expected outcome(s);"                                                                                                                                                      | match terms in line 263 "...objectives, targets and programs;"                                                                                               | Accept                | 4/21/11                                                                                |
| 202 | 283              |                | Technical       | physical protection vs PAP                                                                                                                                                     | inconsistent use of terms                                                                                                                                    | Accept                | 4/21/11                                                                                |
| 203 | 284              |                | Editorial       | Indent does not match above                                                                                                                                                    | Match indent with Line 122                                                                                                                                   | Accept                | 4/21/11 - Noted for technical editor review.                                           |
| 204 | 284              |                | Editorial       | too many negative terms "...of nonconformance's;..."                                                                                                                           | "...through conformation;..."                                                                                                                                | Accept w/modification | 4/21/11                                                                                |
| 205 | 284              |                | Editorial       | nonconformance's should not be possessive                                                                                                                                      | "...nonconformances;..."                                                                                                                                     | Accept w/modification | 4/21/11                                                                                |

| No. | Line No. (begin) | Line No. (end) | Type of Comment | Comment (justification for change)                                                                                                                                                                                                                                            | Proposed Change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Resolution            | Rationale                                                        |
|-----|------------------|----------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------------------------------------------|
| 206 | 284              |                | General         | nonconformance's?                                                                                                                                                                                                                                                             | prevent undesired consequences of nonconformance; and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Not relevant          | 4/21/11 - Section removed                                        |
| 207 | 284              |                | Technical       | add to the line 283 - 284 adaptation to external constraints (new law or regulation, new emerging threat)                                                                                                                                                                     | "... adapt to new external constraints (e.g.: surrounding changes, new law or regulation, emerging threat, etc.) ..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Accept w/modification | 4/21/11                                                          |
| 208 | 285              |                | Technical       | Describe the potential "changes" that could occur.                                                                                                                                                                                                                            | Additional data needed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Accept                | 4/21/11                                                          |
| 209 | 286              |                | Technical       | Believe title refers to industry practice of conducting an "environmental assessment"                                                                                                                                                                                         | Change title to "environmental assessment" or "environmental factors"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Not accepted          | 4/21/11 - Section referenced not found--proposed change unclear. |
| 210 | 288              |                | General         | "...expected outcomes..."                                                                                                                                                                                                                                                     | match terms in line 263 "...objectives, targets and programs;"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Accept                | 4/21/11                                                          |
| 211 | 290              |                | Editorial       |                                                                                                                                                                                                                                                                               | does not need to be a separate paragraph                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Noted                 | 4/21/2011 - Noted for technical editor review.                   |
| 212 | 292              |                | General         | "6.2.1 External context"                                                                                                                                                                                                                                                      | This section is not comprehensive and should go into greater detail on the process of threat and crime assessment. Add a complete section on threat assessment and crime analysis. Consider: <a href="http://www.popcenter.org/library/reading/pdfs/crimeanalysis25steps.pdf">http://www.popcenter.org/library/reading/pdfs/crimeanalysis25steps.pdf</a>                                                                                                                                                                                                                                              | Not accepted          | 4/21/11 - Proposed change deemed to be overly prescriptive.      |
| 213 | 293              |                | Editorial       | Change outcome to goals - flow. Goals is used throughout extensively, aligns with flow of document                                                                                                                                                                            | ... assure the physical protection system can achieve its expected goal(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Not accepted          | 4/21/11 - Not relevant due to changes.                           |
| 214 | 294              |                | Editorial       | "a) the cultural, political, legal, regulatory..."                                                                                                                                                                                                                            | "a) the cultural, <b>social</b> , political, legal, regulatory..."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Accept w/modification | 4/21/11                                                          |
| 215 | 294              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 216 | 294              |                | Technical       | Under para 6.2.1, subpara (a), external content                                                                                                                                                                                                                               | add criminal tendencied between legal and regulatory                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Not accepted          | 4/21/11 - Already covered in item d).                            |
| 217 | 296              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 218 | 300              |                | Technical       | under para 6.2.1, subparas, add subpara (f), as it is recommended that that the same is required and adds to completeness                                                                                                                                                     | f) The general area around the organisation, and its characteristics that can have the adverse effect on the maintenance and security of the organisation's physical assets                                                                                                                                                                                                                                                                                                                                                                                                                           | Not accepted          | 4/21/11 - Already covered in standard.                           |
| 219 | 303              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 220 | 305              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 221 | 306              |                | General         | how do you define an informal process?                                                                                                                                                                                                                                        | remove parenthetical phrase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Accept                | 3/31/11 - Deemed editorial in nature.                            |
| 222 | 307              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 223 | 308              |                | Editorial       | "...strategies that are in place to achieve them;"                                                                                                                                                                                                                            | "... strategies for their achievement;"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 224 | 308              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 225 | 309              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 226 | 310              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 227 | 311              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 228 | 311              |                | Technical       | under subpara 6.2.2, add subpara (h), as it adds to completeness and addresses a perceived gap                                                                                                                                                                                | (h)Processes and procedures for storage, handling and management of physical assets, and how effectively they have been implemented in the organization                                                                                                                                                                                                                                                                                                                                                                                                                                               | Not accepted          | 4/21/11 - Not appropriate to the context/overly prescriptive.    |
| 229 | 312              |                | General         | List in this section lacks reason in its structure                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Noted                 | 3/31/11 - Deemed editorial in nature.                            |
| 230 | 315              | 323            | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |
| 231 | 315              | 323            | General         | re do listing for clarity                                                                                                                                                                                                                                                     | a) assets, activities, functions, services, products, and stakeholder relationships critical to the organization;<br>b) the potential impact or disruptive incidents;<br>c) needs and requirements to include those legal requirements;<br>d) the overall risk management policy;<br>e) the nature and types of threats and their probable consequences that can occur to its business and operations;<br>f) the methodology for determining likelihood, consequences and levels of risk;<br>g) how risks, when experienced in combinations will be handled; and<br>h) its risk appetite or aversion. | Accept                | 4/21/11                                                          |
| 232 | 325              |                | Technical       | "The organization shall define and retain documented information on the scope of the physical asset protection management system, such that the boundaries and applicability of the security management system can be clearly communicated to internal and external parties." | Suggest rewording as follows: The organization shall define and retain documented information on the scope of the PAPMS, such that its boundaries and applicability can be clearly communicated to internal and external parties.                                                                                                                                                                                                                                                                                                                                                                     | Accept w/modification | 4/21/11                                                          |
| 233 | 331              |                | Editorial       | Indent does not match above                                                                                                                                                                                                                                                   | Match indent with Line 122                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Accept                | 4/21/2011 - Noted for technical editor review.                   |

| No. | Line No. (begin) | Line No. (end) | Type of Comment | Comment (justification for change)                                                                                                                                                                                     | Proposed Change                                                                                                                                                                                                                                                                                                                 | Resolution            | Rationale                                                       |
|-----|------------------|----------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------------------------------------------------|
| 234 | 334              |                | Editorial       | Indent does not match above                                                                                                                                                                                            | Match indent with Line 122                                                                                                                                                                                                                                                                                                      | Accept                | 4/21/2011 - Noted for technical editor review.                  |
| 235 | 334              |                | Editorial       | "consider..." is too familiar and does not fit requirement                                                                                                                                                             | "Assign..."                                                                                                                                                                                                                                                                                                                     | Accept                | 4/21/2011 - Noted for technical editor review.                  |
| 236 | 335              |                | Editorial       | Indent does not match above                                                                                                                                                                                            | Match indent with Line 122                                                                                                                                                                                                                                                                                                      | Accept                | 4/21/2011 - Noted for technical editor review.                  |
| 237 | 335              |                | General         | why - identify risk scenarios unless something will be done with them?                                                                                                                                                 | "Determine risk scenarios for use as tests in assessing the PAPMS. These scenarios should be based both on actual and potential internal and external events, that could adversely affect the critical operations, products and functions of the organization.                                                                  | Withdrawn             | 4/21/11                                                         |
| 238 | 338              |                | Editorial       | Indent does not match above                                                                                                                                                                                            | Match indent with Line 122                                                                                                                                                                                                                                                                                                      | Accept                | 4/21/2011 - Noted for technical editor review.                  |
| 239 | 338              |                | Editorial       | it was not written in the same style as a-c above and it is incomplete.                                                                                                                                                | "Define a scope of the physical asset protection management system in terms appropriate to the size, nature, and complexity of the organization from a perspective of continual improvement."                                                                                                                                   | Accept                | 4/21/11                                                         |
| 240 | 352              |                | General         | There is a lot of duplication between this section and the Organizational Resilience Standard, which should be removed.                                                                                                |                                                                                                                                                                                                                                                                                                                                 | Noted                 | 4/21/11                                                         |
| 241 | 365              |                | Editorial       | "The general principal is..." has no basis, what principal?                                                                                                                                                            | "The general principal of this Annex is..."                                                                                                                                                                                                                                                                                     | Accept                | 4/21/11                                                         |
| 242 | 365              |                | Technical       | Lines 365-382 are near verbatim restatements of points made earlier                                                                                                                                                    | delete                                                                                                                                                                                                                                                                                                                          | Accept w/modification | 4/21/11                                                         |
| 243 | 365              |                | Technical       | Experience factor versus security background                                                                                                                                                                           | "who <i>have some security experience but may or may not have</i> "                                                                                                                                                                                                                                                             | Accept w/modification | 4/21/11                                                         |
| 244 | 367              |                | Technical       | "...can be applied to minimize the..."                                                                                                                                                                                 | "...can be applied to minimize and/or mitigate the..."                                                                                                                                                                                                                                                                          | Accept w/modification | 4/21/11                                                         |
| 245 | 367              |                | Editorial       | "... that can be applied to..." too passive                                                                                                                                                                            | "...that when applied will..."                                                                                                                                                                                                                                                                                                  | Accept                | 4/21/11                                                         |
| 246 | 367              |                | Editorial       | Define PDCA, as the informative section could stand a lone from the rest of the document.                                                                                                                              | Definition                                                                                                                                                                                                                                                                                                                      | Noted                 | 4/21/11 - Noted to already be part of the Introductory Section. |
| 247 | 369              |                | General         | Paragraph 365 reads "who may or may not have a security background" and paragraph 369 line 372 reads "...accompanied by an understanding of practices for physical security measures..." This seems to be in conflict. |                                                                                                                                                                                                                                                                                                                                 | Accept w/modification | 4/21/11                                                         |
| 248 | 370              |                | Editorial       | "...The first stage is to conduct a risk assessment, consistent with the process described ..." awkwardly worded                                                                                                       | "...Prior to selecting from a range of security measures, a risk assessment should be conducted to focus the application for the measure, consistent..."                                                                                                                                                                        | Accept                | 4/21/11                                                         |
| 249 | 382              |                | General         | If this is a Standard, then most of the "shoulds" should be "shalls". Otherwise there are no requirements and no way to know when or if an organization has met the Standard.                                          |                                                                                                                                                                                                                                                                                                                                 | Not accepted          | 4/21/11 - Existing language deemed correct and appropriate.     |
| 250 | 383              |                | Editorial       | A.2 is missing                                                                                                                                                                                                         | Re-number section A.3 et al as A.2 et al<br>Re-number A.4 et al as A.3 et al<br>Re-number A.5 et al as A.4 et al<br>Re-number A.6 et al as A.5 et al<br>Re-number A.7 et al as A.6 et al<br>Re-number A.8 et al as A.7 et al<br>Re-number A.9 et al as A.8 et al<br>Re-number A.10 as A.9<br>Re-number A.11 et al as A.10 et al | Accept                | 4/21/11                                                         |
| 251 | 392              |                | General         | "physical asset protection management process" is first discussed and identified here, without any clarification. Is this an identifiable process or is it merely words in a sting?                                    |                                                                                                                                                                                                                                                                                                                                 | Accept                | 4/21/11                                                         |
| 252 | 393              |                | Editorial       | last word "that" does not properly modify items g and h, lines 406/408                                                                                                                                                 | reword g and h                                                                                                                                                                                                                                                                                                                  | Accept                | 4/21/11                                                         |
| 253 | 394              |                | General         | "assets, risks, and obligations are adequately identified."                                                                                                                                                            | "assets, threats, risks, and obligations are adequately identified"                                                                                                                                                                                                                                                             | Accept w/modification | 4/21/11                                                         |
| 254 | 396              |                | Editorial       | remove "...and linkages" or replace with interdependencies                                                                                                                                                             | "interests of stakeholders, as well as dependencies with internal and external resources and stakeholders are understood;" or "interests of stakeholders, as well as dependencies and interdependencies with internal and external resources and stakeholders are understood;"                                                  | Accept                | 4/21/11                                                         |
| 255 | 399              |                | General         | Must ensure that top down buy-in is affected along with front line participation, business continuity and security awareness.                                                                                          | d) confirmation of physical asset protection preparedness on an operational level                                                                                                                                                                                                                                               | Not accepted          | 4/21/11 - Deemed not relevant/applicable to this section.       |
| 256 | 400              |                | General         | "different views" is vague and not defined                                                                                                                                                                             | <i>no recommendation as I do not understand the context.</i>                                                                                                                                                                                                                                                                    | Accept w/modification | 4/21/11                                                         |
| 257 | 403              |                | Technical       | "...qualified and approved physical assets protection professionals" Who qualifies them and where do they get the qualification criteria?                                                                              | " qualified and certified Physical Security Professionals;"                                                                                                                                                                                                                                                                     | Withdrawn             | 4/21/11                                                         |
| 258 | 405              |                | Technical       | "...the regional industry standards and codes of practice,..." I do not recognize these.                                                                                                                               | "...the standards, codes and practices of the facilities and company's regional and industry..."                                                                                                                                                                                                                                | Withdrawn             | 4/21/11                                                         |
| 259 | 406              |                | Technical       | "...situations and disruptions."                                                                                                                                                                                       | "...situations and disruptions is implemented."                                                                                                                                                                                                                                                                                 | Accept w/modification | 4/21/11                                                         |

| No. | Line No. (begin) | Line No. (end) | Type of Comment | Comment (justification for change)                                                                                                   | Proposed Change                                                                                                                                                                                                                                                                                          | Resolution            | Rationale                                           |
|-----|------------------|----------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------------------------------------|
| 260 | 406              |                | Editorial       | replace atypical with                                                                                                                | a typical                                                                                                                                                                                                                                                                                                | Accept w/modification | 4/21/11                                             |
| 261 | 406              |                | Editorial       | For flow and continuity with line 393. "defining and assuring..."                                                                    | "availability of the means of communication is defined and assured during atypical situations and disruptions"                                                                                                                                                                                           | Accept w/modification | 4/21/11                                             |
| 262 | 407              |                | General         | Confusing as written                                                                                                                 | appropriate means of communication during atypical situations and disruptions are identified and made available                                                                                                                                                                                          | Accept w/modification | 3/31/11 - Deemed editorial in nature.               |
| 263 | 407              |                | Editorial       | not a complete thought                                                                                                               | "a means of communication is defined and available during atypical situations and disruptions; and"                                                                                                                                                                                                      | Accept w/modification | 4/21/11                                             |
| 264 | 408              |                | Technical       | "...abnormal conditons."                                                                                                             | "...abnormal conditons is conducted."                                                                                                                                                                                                                                                                    | Accept w/modification | 3/31/11 - Deemed editorial in nature.               |
| 265 | 408              |                | Editorial       | For flow and continuity with line 393. "Regular testing of physical asset..."                                                        | "regular testing is done on the physical asset..."                                                                                                                                                                                                                                                       | Accept w/modification | 4/21/11                                             |
| 266 | 409              |                | General         | Confusing as written                                                                                                                 | the physical assets protection communication system for normal and abnormal conditions is tested on a regular basis                                                                                                                                                                                      | Accept w/modification | 4/21/11                                             |
| 267 | 410              |                | Technical       | Para A 3.2, communication and consultation, add subpara (i), it is felt that the subpara is required and adds to the existing points | i) Awareness as to the Physical asset management and protection is part of the orientation and refresher training curriculum, and that it is ensured that all the employees of the organisation are put through the same.                                                                                | Not accepted          | 4/21/11 - "All employees" training does not belong. |
| 268 | 412              |                | Technical       | "...for reasons of commercial security"                                                                                              | "...for reasons of sensitive information protection..."                                                                                                                                                                                                                                                  | Accept w/modification | 4/21/11                                             |
| 269 | 414              |                | Editorial       | "risk and vulnerability assessment, or its physical asset protection plans" one set is singular and the other plural - standardize   | "risk and vulnerability assessments, or its physical asset protection plans"                                                                                                                                                                                                                             | Accept                | 4/21/11                                             |
| 270 | 414              |                | General         | in the interest of standardization of writing                                                                                        | "i) those portions of the risk and vulnerability assessments and/or the physical asset protection plans that are redacted from the PAPMS due to their sensitive nature and potential of creating an insecurity with their documentation herein will be briefly described and their redaction justified." | Accept w/modification | 4/21/11                                             |
| 271 | 420              |                | Technical       | This addition relates to my comment made in item 37.                                                                                 | ..., for example to limit risk exposure, prevent alarm                                                                                                                                                                                                                                                   | Not accepted          | 4/21/11 - Not the preferred term.                   |
| 272 | 421              |                | Editorial       | add "a" in front of the statement                                                                                                    | "a description..."                                                                                                                                                                                                                                                                                       | Accept                | 4/21/11                                             |
| 273 | 422              |                | Editorial       | add "a" in front of the statement                                                                                                    | "a description..."                                                                                                                                                                                                                                                                                       | Accept                | 4/21/11                                             |
| 274 | 424              |                | Editorial       | reword to remove "...including..."                                                                                                   | "records and documents required by this Standard; and"                                                                                                                                                                                                                                                   | Accept                | 4/21/11                                             |
| 275 | 425              |                | Editorial       | reword to remove "...including..."                                                                                                   | "documents, composed of records, determined ..."                                                                                                                                                                                                                                                         | Accept w/modification | 4/21/11                                             |
| 276 | 430              |                | Technical       | How do you "demonstrate conformity to the requirements of....the results achieved.?"                                                 | delete the phrase "...and the results achieved."; OR restate the concept in a manner that is more clear to the reader                                                                                                                                                                                    | Accept w/modification | 4/21/11                                             |
| 277 | 430              |                | Editorial       | Needs commas                                                                                                                         | "...Standard, the legal and regulatory requirements applicable to the region of application, and the results achieved."                                                                                                                                                                                  | Accept                | 4/21/11                                             |
| 278 | 434              |                | Editorial       | Define "its" in the following: "of processes that relate to <u>its</u> significant risks"                                            |                                                                                                                                                                                                                                                                                                          | Accept w/modification | 4/21/11                                             |
| 279 | 439              |                | General         | Expand on process and include the timeliness of reviews and post mortem reviews                                                      | b) review, update and re-approve documents <b>on a regular basis and after any incident;</b>                                                                                                                                                                                                             | Accept w/modification | 4/21/11                                             |
| 280 | 439              |                | Editorial       | Word use- add "this" and strike "and the"                                                                                            | ...protection management system, this Standard <u>and</u> the                                                                                                                                                                                                                                            | Accept                | 4/21/11                                             |
| 281 | 442              |                | General         | Repetitive                                                                                                                           | Consolidate the thought into 447; "ensure that <i>information and/or</i> documents..."                                                                                                                                                                                                                   | Accept w/modification | 4/21/11                                             |
| 282 | 443              |                | Technical       | need to address document destruction as well                                                                                         | establish document retention, archival, and destruction parameters                                                                                                                                                                                                                                       | Accept                | 4/21/11 (3/31/11 - Deemed editorial in nature.)     |
| 283 | 449              |                | Editorial       | Add "and"                                                                                                                            | "...controlled; and"                                                                                                                                                                                                                                                                                     | Accept                | 4/21/11                                             |
| 284 | 455              |                | Technical       | an explanation to emphasise the requirement to maintain the procedures (Under control of documents-para 4.2)                         | This shall be required to be done by identifying system of classification of documents, and laying down instructions and procedures for their creation, management, handling and access                                                                                                                  | Not accepted          | 4/21/11 - Does not add clarity.                     |