

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Joint Staff White Paper on Notices of )  
Penalty Pertaining to Violations of Critical )  
Infrastructure Protection Reliability Standards )**

**Docket No. AD19-18-000**

**Comments on Transparency**

Submitted to FERC on October 15, 2019

Bradley Allen Kropf, a private citizen, respectfully submits comments on FERC Docket No. AD19-18-000, Joint Staff White Paper on Notices of Penalty Pertaining to Violations of Critical Infrastructure Protection Reliability Standards.

Both my personal as well as professional backgrounds compel me to comment herein.

Personally, I grew up in during the peak of the Cold War with the Soviet Union and the Eastern Block nations. I certainly remember feeling the anxiety of the possibility of a devastating nuclear attack when I was a younger child. As I matured into high school, I understood the strategic implications of fielding a superior nuclear deterrent, and that we were dealing with a rational foe. The resultant mutually assured destruction stalemate removed the ever-present sense of fear of nuclear annihilation, and the subsequent fall of the Berlin Wall further assured me of a future free of global threats.

Professionally, I have worked for several firms focused on the identification and neutralization of global cyber threats. These firms have increased my understanding of the current arena of threat actors, and how aggressive they can be in assessing the potential to damage U.S. critical infrastructure. Most recently, I worked with a secure communications and file sharing blockchain firm, and I focused my attention to helping U.S. utilities and their engineering partners to meet the requirements for implementing security management controls capable of protecting bulk electrical system cyber security information assets. It was during my research of the nature of the potential threats as a cybersecurity professional that I developed a new understanding of the real and present threats that can be as devastating as all of the cold war threats from my childhood. The threats from cyber-attacks on U.S. critical infrastructure combined with the devastating impacts from manmade EMPs and naturally occurring solar events certainly have me worried about the future for my family and children.

I am familiar with the “White Paper” proposed by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) and believe that a move towards open disclosure in Notice of Penalty (NOP) filings is a move in the right direction. I applaud both FERC and NERC for their proposal as well as providing this opportunity for public comment.

However, I am convinced the FERC/NERC white paper is insufficient.

I am a member of the public who is quite honestly growing tired of attempts by powerful organizations, be they private corporations, government agencies, or elected officials, to avoid transparency and accountability for their actions and behaviors. My current level of trust in all of these institutions is at an all-time low, and the ability of the press to act as a neutral watch dog appears to have greatly diminished. Transparency and availability of information are an important first step. It is true that while closely watched, we are always on our best behavior. We need the companies who are responsible for building and maintaining our critical infrastructure to always be on their best behavior – our lives and our futures absolutely rely on this. Given the stakes, I must demand more.

I am familiar with the research, analysis, and public dissemination of information about CIP violators conducted by retired U.S. Army Command Sergeant Major Michael Mabee as well as the “Alternate Proposal” he submitted to FERC on 3 September 2019. I support the level of transparency that is contained within this alternative proposal and state that it is in the best interests of the public that it be provided. I understand the arguments against fuller transparency as well as the industry association resistance to it. Only the alternative proposal provides sufficient information so that the public, press, and investors can hold large companies accountable – and drive better compliance with the impact of minimizing violations. We are all best served by full compliance of obligations to protect critical infrastructure and I view these obligations as promises to protect the public as well as to protect my friends and family.

In summary, I absolutely support Mabee’s alternative proposal and a new, higher level of transparency.

Respectfully submitted by:

A handwritten signature in cursive script that reads "Bradley A. Kropf". The signature is written in dark ink and is positioned above the printed name.

Bradley A. Kropf

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