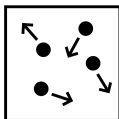


# NSA's general counsel and former director express support for cyber reorganization and unification

## Details on the argument and the pros and cons

### Current organizational structure

- Despite executive orders and presidential directives seeking to clarify cybersecurity roles throughout the government, **the vast array of departments and agencies involved poses significant challenges to cohesive cyber defense and strategy**
- In addition to the focus of the DOD on national security systems and DHS on federal government networks, critical infrastructure and the private sector, there are **six cyber-specific agencies**:



1. The National Cybersecurity and Communications Integration Center (NCCIC) within DHS
2. The National Cyber Investigative Joint Task Force (NCIJTF) led by the FBI
3. The Cyber Threat Intelligence Integration Center (CTIIC) within the ODNI
4. The Cyber Crime Center within the DOD
5. U.S. Cyber Command's Joint Operations Center
6. The Cybersecurity Threat Operations Center (NTOC) within the NSA

- Cybersecurity roles also extend to agencies like the FTC (in matters concerning consumer data security) and the SEC (regarding cybersecurity within the securities markets)

### Arguments for reorganization

- Outlining these structural challenges during a speech at Duke Law School, **the general counsel of the NSA, Glenn Gerstell, advocated for the creation of a new cybersecurity department or agency**
- With the British model in mind, Gerstell sees this option as accomplishing **the two paramount objectives of integration and agility**. Although there are disadvantages associated with standing up an entirely new bureaucracy and losing agency-specific insights, Gerstell argues that the benefits of centralizing cybersecurity resources and expertise would outweigh the costs
- Additional considerations include consolidating congressional oversight (currently divided among a number of committees and subcommittees) and deciding whether the unified entity would become an agency housed within an existing department (and if so, which one) or its own cabinet-level Department of Cyber
- **At a recent Senate Armed Services Committee hearing, the former director of the NSA, Keith Alexander, made a similar case, testifying that the current system "is not working" because cyber cooperation is too "stovepiped."** However, fellow witnesses from the Defense Science Board supported an integrating body rather than a complete restructuring

### The British model

- Officially operational since February, the National Cyber Security Centre (NCSC) brought together four previously separate agencies, which now form a single unit within the Government Communications Headquarters (the English counterpart to the NSA)



Sources: Glenn Gerstell, "Confronting the cybersecurity challenge," 2017 Law, Ethics and National Security Conference at Duke Law School; Morgan Chalfant, "Ex-NSA head: cybersecurity agencies don't share enough information to be successful," The Hill, March 2, 2017; Images by Amrit Mazumder, ChangHoon Baek and Ralf Schmitzer, The Noun Project, March 2017.