

Comments on NIST 800-171B

MB

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Greetings,

I'm am writing on behalf of Carnegie Mellon to express our general support of the comments submitted jointly by the Association of American Universities (AAU), the Association of Public and Land-grant Universities (APLU), the American Council on Education (ACE), the Council on Governmental Relations (COGR), and EDUCAUSE in a memo dated August 2, 2019 with the subject "Response to NIST Request for Public Comment on SP 800-171B, Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations: Enhanced Security Requirements for Critical Programs and High Value Assets".

In particular, we suggest clarification on how and when sponsoring agencies will require the enhanced requirements. We are concerned that compliance may be passed on to sub-contractors, multiplying costs and/or limiting opportunities for collaboration between industry and universities, who may not have the resources to implement the required systems and processes when they would only be needed for a small fraction of work in their overall research activities. We suggest that the standard and agencies for whom it is directed consider adding an explicit exemption for fundamental research performed under broader contracts/projects that are intended to be covered by the standard.

Thank you for this opportunity to comment.

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