

**From:** [800-171comments@list.nist.gov](mailto:800-171comments@list.nist.gov) on behalf of [REDACTED]  
**To:** [800-171comments@list.nist.gov](mailto:800-171comments@list.nist.gov)  
**Cc:** [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]  
**Subject:** [800-171 Comments] Comment  
**Date:** Friday, December 22, 2023 1:42:25 AM  
**Attachments:** [20231222\\_sp800-171r3-fpd-comment-EvaAviation.xlsx](#)

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Dear Ms. Victoria Pillitteri,

Thank you for allowing us to have a meeting regarding SP 800-171rev.3 and SP 800-53 Rev.5 in September of this year.

I am writing to you today to express our public comments on the proposed publication SP 800-171 Rev.3 fpd.

I am an Executive Researcher at EvaAviation.com in Tokyo Japan.

I send our attached comments for SP 800-171 Rev.3 fpd.

I believe that these changes would address my concerns and make the proposed r publication more effective and equitable.

Thank you for your time and consideration.

Sincerely,  
Hajime 'Jim' Takatsuka  
EvaAviation

Comm ent #	Submitted By (Name/Or g):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	EvaAviatio n.com	General	171r3 fpd	13	410	3.1.13. has been removed as Incorporated into 03.01.12., but there is no mention of "adoption of cryptographic mechanisms" in [REQUIREMENT: 03.01.12.]	Shouldn't you mention that you removed the reference to "adoption of cryptographic mechanisms."
2	EvaAviatio n.com	General	171r3 fpd	14	440	3.1.17. says Incorporated into 03.01.16. However, 3.1.16 does not mention "encryption", but is it replaced by the requirements of 3.18.8. Transmission and Storage Confidentiality?	
3	EvaAviatio n.com	General	171r3 fpd	25	865	3.4.7 is incorporated into03.04.06., but there is no mention of "program". Is "program" included in "function"?	
4	EvaAviatio n.com	General	171r3 fpd	26	896	How are "software" and "software program" intended to use differently?	
5	EvaAviatio n.com	General	171r3 fpd	31	1091	Please tell me the reason for withdrawing [3.5.8].	
6	EvaAviatio n.com	General	171r3 fpd	35	1237	[3.7.2] is incorporated into [3.7.4] and [3.7.6], but why is there no description of "techniques, mechanisms"?	
7	EvaAviatio n.com	General	171r3 fpd	38	1364	Rev.2 [3.8.8] describes "portable storage devices", but in r3 fpd [3.8.7. Media Use] it is "Media Transport".	If the words are different, the reason for the difference should be stated.
8	EvaAviatio n.com	General	171r3 fpd	38	1366	In [3.8.5. Media Transport], there is no item corresponding to [A.03.08.05.c] of 171Ar3 ipd, so I think it should be added.	In 171R3fpd, the reason for deleting 171Ar3ipd [A.03.08.05.c] should be stated.
9	EvaAviatio n.com	General	171r3 fpd	48	1733	The reason for the decision of "3.13.2." as "Recategorized as NCO" should be clearly stated.	
10	EvaAviatio n.com	General	171r3 fpd	81	2889	The CA family was originally "Certification, Accreditation, and Security Assessment," but in 53Rev.5 it became "Assessment, Authorization, and Monitoring (CA)," which is difficult to understand because there is no word that corresponds to "C."	
11	EvaAviatio n.com	General	171r3 fpd	41	1481	3.10.Physical Protection corresponds to "3.11 PHYSICAL AND ENVIRONMENTAL PROTECTION" of 53Rev.5, but since there is a requirement of "3.10.6. Alternate Work Site", it is better to title it "PHYSICAL AND ENVIRONMENTAL PROTECTION". Isn't it?	
12	EvaAviatio n.com	General	171r3 fpd	85	2912	PE-08 Visitor Access Records was NFO according to r3 fpd Tailoring Criteria, but has been changed to NCO in r3 fpd. Shouldn't this be considered an NFO?	

\* indicate required fields