

From: 800-171comments@list.nist.gov on behalf of [REDACTED]
To: 800-171comments@list.nist.gov
Subject: [800-171 Comments] Comment on SP 800-171 Rev 3 RPD
Date: Friday, November 10, 2023 11:13:08 AM
Attachments: [sp800-171r3-fpd-comments.xlsx](#)

Hello, please see my attached comment on the draft.

Thank you,

Randy Anderson, CISM (Retired)
Project Manager
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Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	Randy Anderson/George Mason University	Technical	SP 800-171 Rev 3 RPD	21	729	<p>SP 800-171 control 3.3.7 contained the requirement to sync internal system clocks with an authoritative time source (see e.g. NIST SP 800-92.) This was deleted in the Rev 3 IPD and has not been restored in the RPD. Aligning system clocks with an authoritative source has long been considered a best practice. If NIST has a new position on this point it would be good to explain the rationale to the community.</p>	<p>Restore the requirement to sync system clocks with an authoritative time source as stated in SP 800-171 Rev 2 . Further consider adding the corresponding SP 800-53 Rev 5 control SC-45(1) to the Moderate baseline.</p>

* indicate required fields