

From: [REDACTED] [via 800-171comments](#)
To: 800-171comments@list.nist.gov
Subject: [800-171 Comments] Comments on NIST SP 800-171 Revision 3 Initial Public Draft
Date: Wednesday, January 24, 2024 8:30:35 AM
Attachments: [NIST SP 800-171 Rev3 - NIST MDA Comment Matrix 1-23-2024.xlsx](#)

NIST,

The Missile Defense Agency is agreeable to the strategic approach put forth for addressing comments that were made regarding the NIST SP 800-171 Revision 3. Please see attached for emphasized comments.

Best regards,
Mike

Michael E. Wojcik, Ph.D.

Missile Defense Agency

ICD DIB Cybersecurity Lead
DA Cyber Advisor

[REDACTED]

[REDACTED]

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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* |
|-----------|--|--|---|-------------------|------------------|---|-------------------|
| | MDA/MSRF Lawrence Riles [Redacted] | | | 15 | 478-491 | In order to comply with cybersecurity protocols, there shall be no external systems access, except through valid file transfer information systems (i.e., DoD Safe) with separate Claim ID, Recipient and Claim Passcodes, and optional separate authentication password-based protection for individuals external to the organization. | Nothing noted. |

* indicate required fields

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|-----------|--|--|---|-------------------|------------------|---|---|
| | MDA/MSRF Lawrence Riles [Redacted] | | | 6 | 140-185 | Account Management; “f.) Disable system accounts when: 5.) Significant risks associated with individuals are discovered.” This needs further discussion over what is defined as significant versus minor infraction due to unintentional mistakes. Individuals should not be locked out of their accounts over minor incidents for a prolonged period of time, especially if they are involved in time-sensitive work, which could have adverse consequences, if they are not allowed to continue their work. | Reduce unwanted risk of outcome for special projects, operations, or actions involving real-time activities. Justification to “teach them a lesson” is not warranted. |
| | MDA/DAXC Michael Wojcik [Redacted] | | | 2 | 31 | To denote basic security requirements, italicize or place an asterix next to the 15 basic safeguarding requirements derived from the CFR 52.204-21. | Basic security requirements are derived from the basic safeguarding requirements found in the Code of Federal Regulations (CFR) 52.204-21 "Basic Safeguarding of Covered Contractor Information Systems." |

* indicate required fields