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From: Tom Cornelius [REDACTED]  
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Subject: Pre-Draft Call for Comments  
To: 800-171comments@list.nist.gov <800-171comments@list.nist.gov>

Below are NIST SP 800-171 Rev 3 pre-draft comments:

- Update NIST SP 800-53B to create a baseline that is based directly on NIST SP 800-53 Rev 5 to eliminate the need for “Appendix E” from NIST SP 800-171.
- Include both current CUI and NFO controls in the newly-created NIST SP 800-53B baseline to protect CUI/FCI data.
- Focus NIST SP 800-171 Rev 3 on CUI/FCI-specific criteria to address the newly-created NIST SP 800-53B baseline to protect CUI/FCI.
- Eliminate NIST SP 800-171A and rely upon NIST SP 800-53A for applicable CUI/FCI controls from the newly-created NIST SP 800-53B baseline.
- Provide guidance on specifying items as not applicable (e.g., wireless access protections when there is no wireless networking deployed).

This approach removes redundancy and enables an efficient US government-wide approach to protect FCI/CUI.

Respectfully,

Tom Cornelius, CISSP, CISA, CRISC, CDPSE, CIPP/US, PCIP,  
MCITP, MBA

Senior Partner

[REDACTED]  
(office)

[REDACTED]  
(mobile)

