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Subject: 800-171 Comments
To: 800-171comments@list.nist.gov <800-171comments@list.nist.gov>

Hello! I would like to add my 2c in as a system administrator for 22 years, and one that has been deploying cybersecurity techniques since before NIST 800-171 was even first deployed.

- I understand that everyone needs to make money, however, the amount of costs being quoted to companies that would like the ‘medium’ assessments for NIST, and the CMMC level 2 is more than NADCAP, AS9100, ISO 9001, 401K, IRS, ICE, banking, and several other business and process approvals that require audits and assessments combined. Somewhere along the way, someone needs to bake in an upper limit.
- Assessments shouldn’t be over the whole system at once. NADCAP, AS9100, etc. will scope out specific sections and assess on those scopes. Everyone so far has quoted 2+ week assessments to review everything at once, with an outrageous price tag. This is not sustainable for medium and small businesses.
- Spam filtering should be a part of Level 1.
- CMMC shouldn’t even be a thing. Anything deployed in CMMC should have been just baked into NIST 800-171.

Thanks!

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System Administrator

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