

From: [REDACTED]
To: 800-171comments@list.nist.gov
Subject: [800-171 Comments] Submitted comments / Win-Tech / NIST 800-171 Rev 3, pre-draft call for comments
Date: Wednesday, September 14, 2022 4:48:00 PM
Attachments: [image001.png](#)
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Hello!

Thank you for the opportunity to offer pre-draft comments towards the efforts of NIST 800-171 Rev 3.

After speaking with some colleagues, I agree that some things that should be considered include:

- Clarify the document's intent at the beginning of the document. If it's 800-171's intent to be part of DFARS compliance, that should be stated.
- Define both External Service Providers and Cloud Service Providers (they are not the same). This would greatly help limit confusion and it would leave a lot less room for interpretation in the ecosystem. Further, clarifying the applicability of NIST 800-171 to assess CSP and MSPs would be extremely helpful.
- Offer general CUI feedback that currently isn't covered:
 - How should the appropriate flow of CUI be managed if a device is company-owned versus BYOD?
 - Should SPAs that don't process/transmit/store CUI be required to follow the same controls of the assets that do process/transmit/store CUI?
- Offer alternatives to FIPS 140 Validation.

Thank you!


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