

E [REDACTED]

From: Orion Inskip [REDACTED]
Date: Tuesday, July 19, 2022 at 5:57:17 PM UTC-4
Subject: Pre-Draft Call comment for rev 3 800-171
To: 800-171comments@list.nist.gov <800-171comments@list.nist.gov>

In an effort to reduce confusion and streamline security Implementation, NIST should take this opportunity to reduce the number of frameworks, not continue to devise unique frameworks for different applications and industries. With the release of the Cybersecurity Framework, NIST started down the path of standardizing security efforts across all organizations. In some form, all organizations possess some sort of sensitive information that they have a duty to protect. Some information may be more sensitive than other information and may implicate higher levels of protection; however, there are basic protections that all organizations should implement regardless of the overall sensitivity of the information they possess. The CSF is an excellent vehicle for establishing a baseline, standardizing the taxonomy, and standardizing the control expectations across all organizations that handle sensitive information.

To that end, rather than revising NIST SP 800-171, 171A, 172, and 172A, it would be far more useful to put that energy into tailoring the CSF to meet the specific requirements within those other standards through the use of a CSF CUI profile. The CUI profile would meet the basic NARA requirements for CUI Basic and could then be further tailored to meet each agency's unique protection requirements for CUI Specified where required within those agency's law, regulation, or Government-wide policy.

In the alternative, Revision 3 could include an appendix with an overlay of 800-171 and the CSF as indicated in Topic 7a in the call for comments.

Either way, the revision should also include an overlay to the CSF for the appendix E controls listed as NFO that the agency expects Non-Federal Organizations to routinely satisfy without specification.

Orion Inskip

Senior Solutions Architect

ePlus Technology, Inc | an ePlus Company

2355 Main Street, Suite 140

Irvine, CA 92614



| www.eplus.com | Nasdaq: PLUS



The information contained in this electronic transmission and any attachments hereto may be considered proprietary and confidential. Unauthorized distribution of this material to anyone other than the addressed is prohibited. Any disclosure, distribution or use of this transmission for any reason other than their intended purpose is prohibited.