

From: 800-171comments@list.nist.gov on behalf of [REDACTED]
To: 800-171comments@list.nist.gov
Subject: [800-171 Comments] Comments for rev3
Date: Thursday, July 13, 2023 1:01:41 AM
Attachments: [sp800-171r3-ipd-comment.xlsx](#)

Please see attached.

Thanks,
Ryan

Ryan G. Kim
Director, Information Security Department
The Aerospace Corporation

[REDACTED]
[REDACTED]
[REDACTED]

Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	Ryan Kim/The Aerospace Corporation	General	171 Rev3	4	79	If organization-defined parameters are to be set by the Federal organization (Government Customer), this works okay if you only have one organization setting ODP's. If you support multiple customers, it's possible that different Federal organizations may levy differnt ODP's, how would an organization remain compliant? Would they have to create sepearate networks, so that they can comply witch each ODP levied by each customer?	If ODP's are to be used, the host organization should be allowed to set the parameter, having Federal agencies set the parameter inconsistently will significatnly increase costs to deliver services.
2	Ryan Kim/The Aerospace Corporation	Technical	171 Rev3	50	1877	Using FIPS-validated cryptography is not realistic when the CMVP program is taking several months to approve new modules.	Remove FIPS-validated requirements until CVMP can sufficiently process modules in a timely manner.