

From: 800-171comments@list.nist.gov on behalf of [REDACTED]
To: 800-171comments@list.nist.gov
Subject: [800-171 Comments] 800-171 Rev 3 Comments
Date: Monday, July 10, 2023 4:29:50 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[sp800-171r3-ipd-comment-Ball Aerospace.xlsx](#)
[800-171 Rev 3 Cover Letter Ball Aerospace.pdf](#)

Hello,
Please find comments attached, submitted on behalf of Ball Aerospace.

Thank you,

Julie Brainard CISSP | GSLC | CCSK
Ball Aerospace
Enterprise Assurance - Information Security

[REDACTED]



GO BEYOND WITH BALL.™



Ball Aerospace

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ball.com/aerospace

July 10, 2023

National Institute of Standards and Technology
Computer Security Division
Computer Security Resource Center
Email to: 800717comments@nist.gov

RE: Request for Comments NIST Special Publication 800-171 Revision 3, Protecting Controlled
Unclassified Information in Nonfederal Systems and Organizations

Dear NIST:

On behalf of Ball Aerospace, I am pleased to offer comments to the draft NIST Special Publication
800-171 Revision 3.

Thank you for the opportunity to provide these comments and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason M Hamilton".

Jason M Hamilton on behalf of Diana Lovati
Chief Information Security Officer

Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	Ball Aerospace	General	3.1.12	11	358	Documenting all usage restriction configurations and connection types would require significant resource allocation from the DIB to support	a. Establish, authorize, and document usage connections and configurations permitted for remote access.
2	Ball Aerospace	General	3.1.16	12	398	Disabling wireless on all systems with the determination of intended use would entail significant resources allocation	d. When practical, disable, when not intended for use, wireless networking capabilities embedded within the system prior to issuance and deployment.
3	Ball Aerospace	General	3.1.21	14	496	Done through training and would take considerable resources develop a technical implementation	Use of policy and training would be acceptable solution when a technical solution is not available.
4	Ball Aerospace	General	3.1.22	14	501	All CUI is dependent on government identified data - Program specific. Scope is not realistic	a. Train authorized individuals to ensure that publicly accessible information does not contain CUI. If discovered report through proper security channels to address accordingly. REMOVE b. Review the content on publicly accessible systems for CUI [Assignment: organization-defined frequency] and remove such information, if discovered.
5	Ball Aerospace	General	3.2.2	16	557	Frequency for specific role based training would require additional resources (\$) to organizations that currently deliver a more informal training manner	Role-Based Training a. Provide role-based security training to organizational personnel: 1. Before authorizing access to the system, CUI, or performing assigned duties, and [Assignment: organization-defined frequency] thereafter; and 2. When required by system changes. REMOVE b. Update role-based training content [Assignment: organization-defined frequency] and following [Assignment: organization-defined events].
6	Ball Aerospace	General	3.5.7	29	1074	Increase in resources required to select/purchase/install password checker	c. Verify, when technically feasible, when users create or update passwords, that the passwords are not found on the list of commonly-used, expected, or compromised passwords.
7	Ball Aerospace	General	3.14.1	53	2008	Increased resources required to implement additional control	b. If technically feasible, test software and firmware updates related to flaw remediation for effectiveness and potential side effects before installation.

* indicate required fields

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8	Ball Aerospace	General	3.9.1	38	1412	Increased resources required to implement additional control	REMOVE b. Rescreen individuals in accordance with [Assignment: organization-defined conditions requiring rescreening].
9	Ball Aerospace	General	3.13.13	51	1940	Documenting unacceptable mobile code leaves risk that something will be missed. Defining only acceptable mobile code and indicating all other code is unacceptable would suffice	a. Define acceptable mobile code and mobile code technologies.
NEW REQUIREMENTS							
10	Ball Aerospace	General	3.1.23	15	512	Increased cost required to implement additional control	N/A - Suggested New Requirement
11	Ball Aerospace	General	3.4.11	26	958	Increased resources required to implement additional control	N/A - Suggested New Requirement
12	Ball Aerospace	General	3.5.12	30	1116	Increased resources required to implement additional control	N/A - Suggested New Requirement
13	Ball Aerospace	General	3.6.4	32	1206	Increased resources required to implement additional control	N/A - Suggested New Requirement
14	Ball Aerospace	General	3.9.3	39	1457	Increased resources required to implement additional control	N/A - Suggested New Requirement
15	Ball Aerospace	General	3.10.8	42	1555	Increased resources required to implement additional control	N/A - Suggested New Requirement
16	Ball Aerospace	General	3.11.4	44	1638	Increased resources required to implement additional control	N/A - Suggested New Requirement
17	Ball Aerospace	General	3.12.5	46	1716	Increased resources required to implement additional control	N/A - Suggested New Requirement
18	Ball Aerospace	General	3.13.17	52	1972	Not sure how internal traffic is routed or if we have an authenticated proxy server	N/A - Suggested New Requirement
19	Ball Aerospace	General	3.14.8	56	2114	Not sure how/if spam protection mechanism is updated	N/A - Suggested New Requirement
20	Ball Aerospace	General	3.15.1	56	2127	Increased resources required to implement additional control	N/A - Suggested New Requirement
21	Ball Aerospace	General	3.16.2	58	2199	Increased resources required to implement additional control	N/A - Suggested New Requirement
22	Ball Aerospace	General	3.17.1	59	2251	Increased resources required to implement additional control	N/A - Suggested New Requirement
23	Ball Aerospace	General	3.17.2	60	2277	Increased resources required to implement additional control	N/A - Suggested New Requirement
24	Ball Aerospace	General	3.17.3	60	2300	Increased resources required to implement additional control	N/A - Suggested New Requirement

* indicate required fields