

**From:** [800-171comments@list.nist.gov](mailto:800-171comments@list.nist.gov) on behalf of [REDACTED]  
**To:** [800-171comments@list.nist.gov](mailto:800-171comments@list.nist.gov)  
**Cc:** [REDACTED]  
**Subject:** [800-171 Comments] NIST SP 800-171r3 ipd comments  
**Date:** Monday, July 10, 2023 9:35:15 AM  
**Attachments:** [sp800-171r3-ipd-comment-CERT-CC comments.xlsx](#)

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Greetings,

Attached are comments from the CERT Coordination Center.

Please contact me if there are any questions.

Best,

Laurie

Laurie Tyzenhaus  
Senior Member of the Technical Staff  
CERT/CC – The Software Engineering Institute

Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	Laurie Tyzenhaus /CERT-CC	General				Thank you for providing this opportunity to comment/contribute	
2		General	Section 2.1 footnote #12	3	line 63 footnote #12	"The confidentiality impact value for CUI is no less than moderate." It is unclear to the casual reader there are only 3 levels of impact.	Cyber impact values are categorized as low, moderate or high, CUI has a confidentiality impact of moderate
3		General	Section 3.17.2	69	2288	Folks occasionally fail to include preparations for "end of life" in the system's lifecycle.	"throughout the system life cycle, including end-of-life."
4		General	Section 3.17.2	69	2292	Include an incentive for a vulnerability public disclosure program.	"...suppliers. Organizations consider establishing a public reporting channel for receiving reports of vulnerabilities in organizational systems and system components."
5		General	Section 3.17.2	69	2298	Include the source control.	"RA-5(11)"
6		General	Section 3.17.2	69	2299	Include the supporting publications.	", SP 800-53 [61]"