

From: [REDACTED] [via 800-171comments](#)
To: 800-171comments@list.nist.gov
Subject: [800-171 Comments] FW: Modernization of "Media" Definition
Date: Monday, June 12, 2023 10:45:29 AM
Attachments: [image001.png](#)

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[REDACTED] Regan Edens [REDACTED]

Date: Saturday, June 10, 2023 at 7:48 AM

To: Ronald Ross [REDACTED] Victoria Pillitteri [REDACTED]

Subject: Modernization of 'Media' Definition

Dr. Ross and Vikky,

For your consideration-

Modernize the definition of "media" in a "multi-media" world as the term would uniquely apply to CUI in NIST SP 800-171/171A. It would clean up and clear up any ambiguity in the "cross-discipline" relationship between the management, operational, and technical controls and technology in a modern multi-media world from IoT, 3D printers, visualization devices, etc that are necessary to safeguard and control the flow of CUI in non-federal information system under NIST SP 800-171 requirements.

The confusion now is that people do not understand CUI, nor the application of those safeguarding requirements. The definitions do a poor job integrating current safeguarding requirements in a multi-media world under NIST SP 800-171 in concert with definitions in 32 CFR 2002 and CUI LRGWP:

- Definition of CUI includes information
- also includes "Information that qualifies as CUI"
- 'Media' should widen to include digital/non-digital "representations" that enable access to CUI

- Marked/unmarked qualifying information
- Tangible/intangible representations of CUI
- Enabling access or reproduction of CUI

I recognize the DoD references below would not apply to your modernization, but I left them into show you that it is harmonized across applicable DoD references.

(CUI) Media: Physical devices, writing surfaces, materials, or digital or non-digital representations of information which enable sharing, access, or reproduction of CUI, including, but not limited to the use of magnetic tapes, optical disks, magnetic disks, memory chips or devices, printouts, documents, audible, or visual representations of CUI when qualifying information, whether marked or unmarked information is processed, stored, or transmitted, shared, or accessed independently, or transmitted between authorized devices, or transmitted or received by an authorized information system, or enables sharing, reproduction, or access between authorized holders, within a controlled environment, or while under the direct control of an authorized holder.

"CUI media" may generally refer to any tangible or intangible representation of digital or non-digital information that qualifies as a CUI according to an authorized holder's careful analysis, marking, or as represented directly or indirectly by any Agency, controlling authority, authorized holder, or by a reference document related to the requirements, or in performance of the contract, which may be accessed in any form as described in the **CUI Registry** according to the CUI category.

CUI Media may include or provide access to a document, representations of, or enable the ability to reproduce a part, item, product, audible information, visual information, or accurate representation of the fit, form, or function, service, or any other method of conveying qualifying information within a CUI category according to the **CUI Registry**. [Source\(s\): FIPS 200](#) under MEDIA [Source 32CFR § 2002, CUI Registry; ISOO CUI Notices; DoDi 5200.48; DoDi 5230.24; and DoDi 5230.25 \(Adapted for Use\)](#)

Regan Edens
Chief Transformation Officer



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