

**From:** [REDACTED] [via 800-171comments](#)  
**To:** [800-171comments@list.nist.gov](mailto:800-171comments@list.nist.gov)  
**Cc:** [REDACTED]  
**Subject:** [800-171 Comments] Forrester Response: Protecting CUI in Nonfederal Systems and Organizations  
**Date:** Friday, July 14, 2023 11:37:28 AM  
**Attachments:** [sp800-171r3-ipd-comment-Forrester Response.xlsx](#)

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Hello,

Please find attached Forrester's response to NIST's Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations request for comment. We appreciate the opportunity to provide our feedback.

If you have any questions, please direct them to our NIST Account Manager, Taylor Hawkins

[REDACTED] Thank you!

Best regards,

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**FORRESTER**

BOLD AT WORK

**Taylor E. Hilliard**

she, her, hers

[Forrester Public Sector](#) Associate Capture Manager

[REDACTED]

ESI Approved Vendor | [N66001-19-A-0050](#) | GSA Schedule [47QTCA18D001C](#) | FEDLINK Approved Vendor LCFDL21D0010 |

NITAAC CIO-CS Approved Vendor | NASPO Contract [186841](#) | DUNS 106765928

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Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	Chris Gallacher, Forrester Research, Inc.	General	NIST SP 800-171r3 initial public draft publication	-	-	There is no mention of a classification process to identify and mark CUI.	Forrester suggests providing some context around responsibilities around the classification of CUI
2	Chris Gallacher, Forrester Research, Inc.	Technical	NIST SP 800-171r3 initial public draft publication	27	1025	There is no mention of requiring phishing resistant MFA.	Forrester suggests ensuring MFA solutions are phishing-resistant.
3	Chris Gallacher, Forrester Research, Inc.	Technical	NIST SP 800-171r3 initial public draft publication	49	1845	Split tunneling refers to VPN technologies. The government should encourage using VPN-less solutions (Software Defined Networks) as per the Zero Trust framework.	Forrester suggests including recommendations to explore Software Defined Networking (SDN) solutions.
4	Chris Gallacher, Forrester Research, Inc.	Technical	NIST SP 800-171r3 initial public draft publication	56	2114	This should reference 3.2.3 and also include the ability to report spam that might appear valid.	Forrester suggests including the requirement to report spam.
5	Arpit Bajpai, Forrester Research, Inc	Technical	NIST SP 800-171r3 initial public draft publication	46	1716	Independent assessments should suffice for CMMC certifications/audits or replace joint surveillance programs.	Forrester suggests including that an independent assessment will suffice for CMMC C3PAO and/or joint surveillance audits.