

**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)  
**Subject:** [800-171 Comments] Public Draft of NIST SP 800-171, Revision 3 - Comments  
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**Attachments:** [NIST Comment Change HELIN.xlsx](#)

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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         | Helin, Robert/Haivi       | Technical                              | SP 800-171r3                            | 33                | 1227             | "3.7.1. Withdrawn:<br>Recategorized as NCO"<br>Classifying patching as not directly related to protecting CUI seems inherently unsafe. If it is no longer supported by the manufacturer, it is only a matter of time until a new vulnerability is discovered and exploited. With no new patches, it will become a "forever Zero-Day" similar to instance we have seen with deprecated OS's like WinXP and Win7. | I suggest that Maintenance place an emphasis on patch cadence and the need for replacing End of Life Hardware as a security function. |