

**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] Comments on NIST SP 800-171r3 initial public draft  
**Date:** Wednesday, June 28, 2023 11:09:15 AM  
**Attachments:** [image001.png](#)  
[sp800-171r3-ipd-comment Trent Lowe 6 28 23.xlsx](#)

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Good morning,

I have attached a comment a change to Rev. 3 of SP 800-171.

Thank you,

Trent Lowe  
IT Manager

Innovative Circuits, Inc.

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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	Trent Lowe	General	Publication	49	1868	Draft 3 removes language from Control 3.13.8 which previously specified encryption of CUI during transmission must be implemented "unless otherwise protected by alternative physical safeguards". This would be a significantly change compared to the previous revision, which would allow unencrypted transmission of CUI in an internal network with proper physical safeguards in place.	Restore the language regarding alternative physical safeguards, or clarify in the discussion that physical safeguards are no longer an adequate alternative to physical safeguards for transmission of CUI on an intranet, as this change was not highlighted in change analysis document.