From: via 800-171comments

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Cc:

Subject: [800-171 Comments] Lumen 800-171 Rev 3 Comments

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Attachments: SP 800-171r3-IPD-comment-template Lumen v1.xlsx

Importance: High

Attached are the Lumen corporation comments on the SP 800-171 Rev 3. Please let me know if you have any questions.

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Comment #	Submitted By (Name/Org): *	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line / Section #*	Comment (include rationale)*	Suggested Change*
1	Lumen	Technical	800-171 R3	12	427	It lacks comments on any devices that can require signals (e.g., smart watches).	Add restrictions around mobile devices / or anything that can receive / transmit electronic signatures. May want to provide an exception for medical devices.
2	Lumen	Technical	800-171 R3	3	63	1. Does this mean all CUI Info must be protected at moderate baseline info or the highest level for each vendor 2. This will require all vendors to encrypt data at rest / transit, it could have major expense / implementation time impact especially for small business and subcontractors and flow-down	1. Clarify if the info be encrypted at rest and in transit and make it more explicit so all vendors understand the requirement 2. Perhaps having greater granularity regarding CUI category to help mitigate cost / timeline implementation
3	Lumen	Editorial	800-171 R3	46		1. Unclear requirements on when we have to have an independent assessor audit and how long will it be good for. 2. It doesn't or reference continuous monitoring. 3. Conducting 3PAO audits are expensive depending on the periodicity.	Address continuous monitoring Clarify when vendors must conduct a independent assessor audit and how long is the audit valid for.