

From: Zane Patalive

Date: Tuesday, July 19, 2022 at 11:10:36 AM UTC-4

Subject: 800-171 feedback

To: 800-171comments@list.nist.gov <800-171comments@list.nist.gov>

Greetings,

I received notice of your request for comments concerning NIST SP800-171. I have assisted many companies with their self-assessment tasks as compared to 171, and I have a few general thoughts to share.

- 1. SP800-171 is certainly written from the perspective of an on premises network as opposed to a cloud environment or hybrid environment. This orientation makes it difficult for some companies to properly interpret the controls as they apply to their particular situation. Instead of changing the wording of the controls, I think a document that helps to explain the interpretation of each control in a local, hybrid, and completely cloud environment would be extremely helpful.
- 2. Please modify or remove the requirements concerning FIPS validated encryption as this is often times counter to today's modern protections
- 3. Please maintain consideration for small businesses as you consider each control. These companies are our clients and they sincerely desire to be secure, but cannot afford a fulltime compliance officer
- 4. Please give guidance for how outsourced MSPs can successfully coexist with supporting small businesses security

If other thoughts come to mind, I'll send them in. Thank you for the work you do.

Zane

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