From: Niels E. Anqvist ████████████████████
Date: Wednesday, July 20, 2022 at 12:01:34 PM UTC-4
Subject: Comments via Cloud Security Alliance
To: 800-171comments@list.nist.gov <800-171comments@list.nist.gov>

Hi NIST,

I think the 800-171r2 is addressing the right controls and security areas – WHEN ADDRESSING THE NETWORK ACCESS model.

… BUT, when you have a solution that is addressing many of these controls in a different way (due to Layer 7 access) … based on ephemeral connectivity (null-state) – without any 3rd party dependencies … and which control CUI data in a way where most of the controls in the 800-171r2 framework are not really relevant … I find it a bit problematic that organisations are looking towards a NIST framework that really only takes them half the way – and in a direction where they are only mitigating risk – NOT ELIMINATING RISK.

Via Zafepass the client (say Entity A) can define a "Zafepass encrypted drive for their CUI data – also on 3rd party (Entity B) devices needing access or work with Entity A's CUI. This share CANNOT be mounted, found or used by any other "system" – only the specific Zafepass site, where IT have full (i.e. 100% control) of the CUI – which is always full-encrypted (except when decrypted in the application used.

I have attached two presentation of Zafepass – one "Zafepass prezi" fro intro to Zafepass – another for the CMMC 2.0 intro – and lastly a self-assessment one of our client did, where both they and we commented on some of the controls.

Feel free to get back to me if you have comments or want to initiating a dialog – just a small warning – we do things a bit different for the benefit of our clients and eliminating everything a cyber-criminal needs to get access to in order to be successful in his/her objectives and goals.

Looking forward to your potential response.

Yours sincerely,

Niels E. Anqvist, CEO & Founder

We eliminate what adversaries need for acting on their objectives, creating the leading

Zero-Trust Attribute Based Access, Communication and Identity Control platform!

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