Sir/Ma'am,

Attached our Airlines for America's comments on NIST 800-171 Rev 3.

Marty

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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	Airlines for America	Technical	Analysis	General	3.1.23, 3.4.12, 3.5.12, 3.12.6, 3.12.7, 3.14.8, 3.15.1, 3.15.2, 3.16.3, 3.17.1, 3.17.3,	Several control activities incorporate the use of "agency defined" language. As currently drafted, the addition of this language significantly reduces the contractor's ability to fully understand, manage and assess potential compliance with the control activity as federal agencies have not defined or implemented "agency defined" parameters or requirements and will not do so unless and until NIST SP 800-171, Revision 3 is implemented by each agency.	Recommend (i) parameters are specified in each control activity, or in the alternative, (ii) a baseline set of parameters is included in the control activity that agencies may leverage, and non-federal organizations may adopt with a recognition that there may be specific instances where agencies modify the parameters.
2	Airlines for America	Technical	Analysis	General	3.4.10, 3.4.11, 3.6.4, 3.9.3, 3.10.7, 3.10.8, 3.11.4, 3.12.5, 3.13.17, 3.13.18, 3.15.3, 3.16.1, 3.16.2,	The discussion sections associated with each control activity within NIST SP 800-171, Rev.3 are not fully consistent with the discussions regarding NIST SP 800-53.	Recommend aligning the discussions between each NIST standard and add additional context when necessary as it relates to CUI.