Please my attached subject comments, as request this date.

Regards,

Joseph D. Yuna

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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	Joe Yuna (AFLCMC/CROWS/CRST)		NIST SP 800-171r3 ipd	1	25	This sentence makes no logical sense, as it infers that the information is not CUI regardless if federal related or not (being read at a minimum?). Page 2, line 30 provide the direct applicability statement needed vice the confusing, existing one.	Delete. Either you are using CUI on a supported federal system (IT Information System [IS]) or not.
2	Joe Yuna (AFLCMC/CROWS/CRST)		NIST SP 800-171r3 ipd	1	14	Disagree with footnote 3 as it conflicts with established E.O. and NSA definitions for systems. 44 U.S.C. § 3502 (9), "Definitions". 44 U.S.C. SEC 3542 along with a NSA Memo These include cyber-physical systems, embedded systems, and devices. Further references elaborate in detail about NSS categorization material. A system is either a National Security Systems (NSS) or an IT Information System (IS). In DoD contracts, we use the latest terms for these two different systems.	Recommend to avoid confusion across for federal and DoD programs alike, the use of IT Information System (IS) vv. Information System. Same recommendation (pg. 5, line # 114) for system that has a different meaning for engineers than IS.
3	Joe Yuna (AFLCMC/CROWS/CRST)		NIST SP 800-171r3 ipd	All	All	No further comments this date.	Overall, a great improvement over the existing standard. Since the E.O.s address as do FARS/DFARS the differences between NSS and IS, I strongly suggest we use the same acronyms and their definitions so all USG Department and Agencies understand each others documents intent and purpose for the approropriate systems presented. For the DoD who makes great use of the NIST RMF Control standard (NIST SP800-53 series), this proper use of NSS vv. IS is critical to avoid confusion at a technical terminology level across all engineering disciplines, managers and contracting officers.