Greetings,

On behalf of the members of MSPs for the Protection of Critical Infrastructure, please find our comment matrix attached.

Sincerely,

Jacob Horne

Director, Policy & Standards

MSPs for the Protection of Critical Infrastructure

Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	15	478	Base controls and control enchancements should not be combined in single requirements.	AC-20, AC-20(1), and AC-20(2) should be separate requirements.
2	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	32	1146	Control items b. - d. in IR-4 are categorized as NCO while the overall control is cateogized as CUI.	All control items in IR-4 should be categorized as CUI.
3	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	32	1146	IR-4 and IR-8 are combined into a single requirement.	IR-4 and IR-8 should be separate requirements.
4	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	32	1146	Multiple control items in IR-8 are categorized as NCO while the overal control is categorized as CUI.	All control items in IR-8 should be categorized as CUI.
5	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	57	2075	Control items a. - i. appear to be ommitted without a corresponding tailoring category while also being directly related to the confidentiality of CUI.	Controls items a. - i. should be included in 3.16.1.
6	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	60	2199	Control item c. is categorized as NCO while the overall control and other items are categorized as CUI.	Control item c. should be categorized as CUI.

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7	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	87	2918	PS-7 is categorized as ORC but SA-9 does not adequately address it's control items.	Categorize PS-7 as either CUI, NCO, or FED.
8	MSPs for the Protection of Critical Infrastructure	General (tailoring)	171r3 FPD	88	2924	SA-9(2) is directly related to protecting the confidentiality of CUI as it directly strengthens the assurance mechanisms in SA-9.	Categorize SA-9(2) and all corresponding control items as CUI.

* indicate required fields

https://csrc.nist.gov/publications/detail/sp/800-171/rev-3/draft