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1	**#**	**Organization Name**	**Submitted By**	**Type***	**Page #^**	**Starting Line #^**	**Ending Line #**	**Section #**	**Comment (Include rationale for comment)^**	**Suggested Change^**
2	1	The Aerospace Corporation	Ryan Kim	T	12	471		3.1.1e	Dual authorization can be implemented with technical or procedural controls. Since purely technical controls will not always be an available solution, specify that either technical or procedural controls will meet the requirement.	Employ dual authorization **through technical or procedural controls** to execute critical or sensitive system and organizational operations.
3	2	The Aerospace Corporation	Ryan Kim	T	18	621		3.5.2e	MFA or complex account management isn't required in all situations, so keep the scope of this requirement to those situations where MFA or complex account managment does apply.	**Where multifactor authentication or complex account management is required, and there are systems and system components that do not support multifactor authentication or complex account management,** employ password managers for the generation, rotation, and management of passwords.

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4	3	The Aerospace Corporation	Ryan Kim	T	29	910		3.13.2e	The discussion noted increased work (translating to increased cost) for defenders. There was no discussion of disruption to system users who could also be impacted. Recommend an overarching statement to allow organizations to implement based on risk to allow for the proper discussions trading off security, program execution, system availability, cost, and more is recommended.	**Where warranted based on the overall risk as determined by the organization and critical program or high value asset security POC**, disrupt the attack surface of organizational systems and system components through unpredictability, moving target defense, or non-persistence.
5	4	The Aerospace Corporation	Ryan Kim	T	30	956		3.13.3e	This requirement could impact or disrupt system users. Recommend an overarching statement to allow organizations to implement based on risk to allow for the proper discussions trading off security, program execution, system availability, cost, and more is recommended.	**Where warranted based on the overall risk as determined by the organization and critical program or high value asset security POC,** employ technical and procedural means to confuse and mislead adversaries through a combination of misdirection, tainting, or disinformation.

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6	5	The Aerospace Corporation	Ryan Kim	T	31	976		3.14.4e	If the intended scope is "all organizational systems," the requirement will be highly disruptive and cost prohibitive. Recommend an overarching statement to allow organizations to implement based on risk to allow for the proper discussions trading off security, program execution, system availability, cost, and more is recommended.	**Where warranted based on the overall risk as determined by the organization and critical program or high value asset security POC,** refresh organizational systems and system components from a known, trusted state at least twice annually.