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MEMORANDUM

August 2, 2019

To: Computer Security Division, Information Technology Laboratory, National Institute of Standards and Technology (NIST)

Subject: Response to NIST Request for Public Comment on SP 800-171B, Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations: Enhanced Security Requirements for Critical Programs and High Value Assets

On behalf of Duke University, thank you for providing the opportunity to submit comments on the proposed enhanced requirements for Controlled Unclassified Information (CUI) under NIST SP 800-171B. Duke is supportive of the goal to protect Controlled Unclassified Information (CUI) in nonfederal systems and organizations. However, the enhanced requirements of NIST SP 800-171B has raised a number of questions and concerns due to the ambiguous nature of the requirements as drafted and potential impact it could have on the ability of our nation's universities to conduct fundamental research.

Under separate cover, the Association of American Universities (AAU), the Association of Public and Land-Grant Universities (APLU), ACE, Council on Government Relations (COGR), and EDUCAUSE have provided substantial comments on this proposal. Duke University aligns itself with these comments and urges close consideration of the recommendations and request for clarification contained in that submission.

Thank you again for the opportunity to provide input in this critical process. Duke remains committed to the goals of protecting Controlled Unclassified Information and looks forward to a continued dialogue on the best approach that balances security needs with the our mission to conduct fundamental research that benefits our global society.

Sincerely,



James D. Luther
Associate Vice-President Finance & Research Cost Compliance Officer

Copy: Melissa Vetterkind, Director, Office of Government Relations
Dan Vick, Director, Export Controls