#	Organization Name	Submitted By	Type*	Page #^	Starting Line #^	Ending Line #	Section #	Comment (Include rationale for comment)^	Suggested Change^
1	Michigan Technological University	David Hale	G	8	369	372	"THE REQUIREMENTS"	The broad language on what data or components may constitute a critical program or high value asset makes it difficult to determine when the requirements are in effect. In the past we have seen issues with contracts that are designated as falling under DFARS 7012, but when asked what data is CUI we find that our organization does not have any of the related data. With the significant cost increase for compliance with 800-171B this problem may lead to substantial, unpredicable, increases in our operating cost.	

2	Michigan Technological University	David Hale	G	20	664	669	3.6.1e	Operating a staffed SOC 24 hours a day, seven days per week creates unneccessary burden on the organization. The objectives can be obtained through automation and alerting which can be done 24/7 with support staff on call if an alert is triggered.	The SOC is staffed with skilled technical and operational personnel (e.g., security analysts, incident response personnel, systems security engineers) who are available to respond 24 hours per day, seven days per week; and implements technical, management, and operational controls (including monitoring, scanning, and forensics tools) to monitor, fuse, correlate, analyze, and respond to threat and security-relevant event data from multiple sources.
3	Michigan Technological University	David Hale	T	29	910	955	3.13.2e	Disrupting the attack surface through moving target defense is prohibitively complex and costly to the organization. The methods suggested within the draft are beyond the capabilities of most organizations, even large corporations.	