

Author Full Name : James Poole**Received Date :** 03/24/2026 12:26 PM**Comments Received :**

Obelisk Tech Systems Inc. (CAGE: 9S0L8, UEI: U34MSJ6A6413) submits this formal comment on ICR 202509-0704-003 (OMB Control Number 0704-0478) regarding the renewal of the DFARS 252.204-7012 Safeguarding Covered Defense Information and Cyber Incident Reporting collection.

CORE ARGUMENT: DoD's stated burden of 6,770 hours across 16,233 respondents (0.42 hrs/respondent) understates true DIB compliance burden by a factor of 79. Manual compliance with DFARS 252.204-7012 and NIST SP 800-171 requires approximately 33 hours per respondent annually — making true total burden approximately 535,689 hours and true annual cost to the DIB approximately \$26.8 million. DoD's estimate appears to capture only final form submission time, not the underlying compliance labor.

COTS SOLUTION: Commercially available automated assessment platforms reduce true manual burden by 97% — from ~33 hours to ~1 hour per respondent. OIRA should require DoD to: (1) revise the estimate upward to reflect true manual methodology; (2) formally recognize COTS-available assessment tools as a compliant DFARS 7012 methodology; and (3) show the COTS reduction pathway as the target burden in the next renewal cycle.

AUTHORITIES INVOKED: EO 12866 (accurate cost-benefit analysis required); EO 13563 (least-burdensome alternative must be identified); EO 14192 (net regulatory costs must be significantly less than zero — impossible to determine with a 79x understated baseline); EO 14219 (unnecessary compliance burden must be eliminated); Regulatory Flexibility Act 5 U.S.C. §604 (RFA small entity analysis required — 70% of respondents are small businesses).

Full technical analysis, the 33x burden table, COTS reduction data, and specific recommendations are contained in the attached PDF.

Submitted by: James Hunter Poole, Executive Chairman & CEO
Obelisk Tech Systems Inc. | ITAR DS-2032 | HUBZone
Certified | Thomasville, Georgia