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I am submitting this comment as an independent researcher with expertise in artificial intelligence, cybersecurity, and regulatory compliance, in response to the proposed DFARS updates to provisions 252.204-7012 and 252.239-7010.

The attached research paper addresses critical implementation challenges and opportunities presented by these proposed changes, with particular focus on how emerging Agentic AI technologies can help defense contractors meet new reporting and monitoring requirements.

KEY POINTS FOR CONSIDERATION:

1. AUTOMATION CAPABILITIES

The proposed 72-hour reporting windows and continuous monitoring requirements create significant operational burdens, particularly for small and medium-sized contractors. My research demonstrates that Agentic AI systems—autonomous agents capable of detecting, analyzing, and reporting cyber incidents—can reduce reporting time from weeks to hours while improving accuracy and completeness.

2. CROSS-SECTOR INSIGHTS

Parallel regulatory developments in financial services (NYDFS, DFSA, OSFI) provide valuable lessons for defense contractor compliance. Financial institutions have successfully deployed AI-driven compliance frameworks that balance automation with human oversight, achieving 34% reduction in false positives while maintaining regulatory accountability.

3. IMPLEMENTATION FRAMEWORK

The attached paper proposes a five-layer architecture integrating data ingestion, ML-driven analysis, autonomous AI agents, orchestrated response capabilities, and automated compliance reporting. This framework addresses both technical requirements (incident detection, cloud service monitoring) and governance needs (explainability, human-in-the-loop oversight, audit trails).

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4. RISK MANAGEMENT

While Agentic AI offers significant benefits, it also introduces new risks including adversarial attacks on AI systems, model bias, and automation failures. The research identifies specific mitigation strategies including adversarial robustness testing, explainable AI components, and layered security controls.

5. WORKFORCE AND RESOURCE IMPLICATIONS

Current analysis suggests 85-90% of defense contractor cybersecurity personnel lack adequate AI training. Successful implementation requires coordinated investment in technology infrastructure (30-40% of budget), workforce development (20-25%), and governance frameworks (15-20%).

RECOMMENDATIONS:

- Consider phased implementation timelines that account for varying contractor capabilities
- Develop standardized AI system evaluation criteria for regulatory compliance
- Establish information sharing mechanisms enabling contractors to collaborate on AI-driven threat intelligence
- Provide guidance on acceptable autonomous vs. human-supervised decision-making boundaries
- Create regulatory sandboxes or pilot programs for testing novel AI compliance approaches

The proposed DFARS updates represent an important step toward improving defense supply chain cybersecurity. Strategic integration of Agentic AI technologies can help contractors meet these requirements efficiently while strengthening overall security posture.

I respectfully request this comment and accompanying research be entered into the public docket for consideration.

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Attachments 1



Multi_Layer_Agentic_AI_Framework_Financial_Defense_Cybersecurity



Download (https://downloads.regulations.gov/DARS-2025-0006-0002/attachment_1.pdf)

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