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Comment on FR Doc # 2024-18110

Posted by the **Defense Acquisition Regulations System** on Oct 16, 2024

[Docket \(/docket/DARS-2020-0034\)](/docket/DARS-2020-0034) / [Document \(DARS-2020-0034-0194\) \(/document/DARS-2020-0034-0194\)](/document/DARS-2020-0034-0194)
/ [Comment](#)

Comment

Dear Ms. Kitchens:

On behalf of the members of the Council of Defense and Space Industry Associations (CODSIA), we write to submit these comments regarding the proposed rulemaking entitled “Defense Federal Acquisition Regulation Supplement: Assessing Contractor Implementation of Cybersecurity Requirements (DFARS Case 2019-D041)”, Docket ID: DARS-2020-0034, RIN 0750-AK81 published in the Federal Register on August 15, 2024.

CODSIA members are longstanding supporters of the Department of Defense’s (DoD’s) efforts to improve the security and resilience of the Defense Industrial Base (DIB). Our member associations have engaged and counseled DoD leadership since the inception of the CMMC program and repeatedly provided actionable recommendations on ways to strengthen the program.

In the attachment, we have aggregated comments and recommendations that impact our collective members, representing a significant portion of the DIB. Specifically, we recommend the following: 1) Narrow or eliminate the 72-hour requirement to notify the contracting officer of lapses, 2) Remove the continuous attestation requirement for Senior Officials, 3) Clarify the intent for Federal Contract Information (FCI), 4) Clarify the flowdown requirements, 5) Publish methodology by which programs determine the CMMC level and the timing of the certification requirement, and 6) Define specified terms.

Because the U.S Government published the 146-page Cybersecurity Maturity Model Certification (CMMC) Program final rule, which includes changes to part 32 CFR and which serves as a companion to the subject proposed rule, on October 15, 2024, the comments hereunder do not reflect those part 32 CFR changes.

If you have any questions or request additional information, please contact David Drabkin, the CODSIA Administrator, by email at codsia@codsia.org.

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Sincerely
See the full comments in the attached file.

Attachments 1



CODSIA CMMC DFARS Case 2019-D041 - Final Draft



Download (https://downloads.regulations.gov/DARS-2020-0034-0286/attachment_1.pdf)

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