

PUBLIC COMMENT SUBMITTED TO
DOCKET DARS-2026-0331

Defense Federal Acquisition Regulation Supplement (DFARS): Covered Defense Telecommunications Equipment or Services, Information Collection Extension (OMB Control No. 0750-0002)

Docket ID: DARS-2026-0331

OMB Control Number: 0750-0002

Capacity: Independent private-5G engineering and cybersecurity professional. Comment filed in personal capacity. Not a federal contractor. Not a lobbyist.

Comment

I respectfully submit this comment regarding the Department of Defense's proposed extension of the information collection under OMB Control Number 0750-0002 implementing Section 1656 of the National Defense Authorization Act for Fiscal Year 2018. With more than twelve years of professional experience in private 5G engineering, virtualized core network deployment, and cybersecurity, I offer technical recommendations focused on improving operator-level verification for modern private 5G environments.

Support for the Extension

I support extending the information collection because protecting defense telecommunications infrastructure remains an important national security objective. As telecommunications networks continue evolving toward software-defined and cloud-native architectures, verification requirements should also evolve to address emerging supply chain and cybersecurity risks associated with virtualized network environments.

Recommendation to Expand Verification

Current verification primarily focuses on physical telecommunications equipment. Modern private 5G networks, however, rely extensively on containerized and virtualized network functions operating on general-purpose infrastructure. I respectfully recommend expanding verification requirements to include:

- Container images and deployment packages obtained from covered telecommunications suppliers.
- Open-source software components used within private 5G control-plane and user-plane functions when they originate from covered jurisdictions.
- Software-defined networking controllers and orchestration platforms responsible for managing private 5G traffic when supplied or maintained by covered entities.

Expanding verification to software components would better reflect the architecture of today's telecommunications infrastructure.

Recommended Verification Practices

I recommend incorporating practical operator-level verification measures, including:

- Collection and maintenance of Software Bills of Materials (SBOMs) for each software release.

- Continuous monitoring of deployed container image repositories against applicable covered equipment and supplier lists.
- Digital signing and verification of container images before deployment.
- Periodic operator attestations confirming that covered telecommunications components have not been introduced into deployed private 5G environments.
- Prompt reporting, containment, and remediation procedures whenever covered components are identified.

These measures strengthen supply chain visibility while remaining practical for organizations operating modern private 5G environments.

Estimated Burden

The existing burden estimate remains generally appropriate. Most organizations operating modern private 5G environments already maintain software inventories and deployment pipelines. Expanding verification to software components would require only limited additional effort while providing meaningful improvements in supply chain assurance and cybersecurity risk management.

Conclusion

I respectfully support extending the information collection under OMB Control Number 0750-0002 and recommend expanding the verification methodology to include software, containerized applications, and virtualized network functions used in private 5G deployments. These recommendations strengthen telecommunications supply chain verification while reflecting the realities of modern cloud-native network architectures. Adoption of these measures would improve the security, integrity, and resilience of defense telecommunications systems while maintaining a practical compliance framework for operators.

Thank you for the opportunity to submit this comment.

Respectfully submitted,

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