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Comment on FR Doc # 2022-13233

Posted by the **Defense Acquisition Regulations System** on Jul 18, 2022

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Comment

OMB Control Number 0704-0478

whether the proposed collection of information is necessary for the proper performance of the functions of DoD, including whether the information will have practical utility;

The information is absolutely necessary for the proper performance of the function of the DoD. The information does have practical utility to support DoD risk decisions about their supply chain.

the accuracy of the estimate of the burden of the proposed information collection;

The call for inputs states that the average burden per response is 0.29 hours. It does not state how this number is calculated. When all the information has been gathered by the company, and its reporting has been determined to be required then the simple act of entering the information into the portal per incident may take on average around 30 minutes. In general however the totality of the effort required to be prepared too, capable of, and actually execute the information gathering processes required to support the reporting would raise the per report burden of response significantly.

With over 80K companies subject to the regulation by the DoD's estimate, and only 2,000 companies actually making reports there seems to be a disconnect in reporting. Additionally, those companies on average are reporting more than once a month indicating a frequent report rate for companies that are

reporting, and a very large body of companies with a zero rate.

ways to enhance the quality, utility, and clarity of the information to be collected;

For a covered entity, reporting should occur frequently based on the normal rate of cybersecurity incidents in industry. Clearly it is not. Recommend additional public dialogue on the need for reporting in various forums, particularly business forums by senior leadership. Additionally recommend further work with contracting officers and PM's through the Defense Acquisition University to sensitive government representatives to no punish companies for reporting. Fear of backlash is the #1 reason companies do not report.

and ways to minimize the burden of the information collection on respondents, including the use of automated collection techniques or other forms of information technology.

The current automated portal is adequate, but a simpler initial reporting form would be useful. Compare the current reporting mechanism to a typical commercial activity where an organization wants to encourage information submission. That is NOT how the current portal is configured.
The ability to submit reports via email exists but could be enhanced and streamlined while continuing to meet information security requirements.

Comment ID

DARS-2022-0016-0002

Tracking Number

l5m-sogn-f680

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