

**COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS**  
**4401 Wilson Boulevard, Suite 1110**  
**Arlington, Virginia 22203**  
[codsia@codsia.org](mailto:codsia@codsia.org)  
[www.codsia.org](http://www.codsia.org)

25 Sep 2019

Honorable Kevin Fahey  
Office of the Assistant Secretary of Defense for Acquisition  
3600 Defense Pentagon, Room 3E185  
Washington, DC 20301-3600

Ref: Cybersecurity Maturity Model Certification V0.4

Dear Mr. Fahey:

The Council of Defense and Space Industry Associations (CODSIA)<sup>1</sup> is pleased to offer our comments in response to the Department of Defense (DoD) Request for Comment on the Cybersecurity Maturity Model Certification V0.4.

We have attached for your consideration our comments in the format you requested in the online announcement. Please note, this CODSIA submission reflects the inputs from many of the member associations and some associations will be directly providing more extensive submissions.

Thank you for your attention to these comments. If you have any questions or need any additional information, please contact Dave Drabkin, CODSIA at: [codsia@codsia.org](mailto:codsia@codsia.org) or by phone at: +1.703.927.1116.

Sincerely,



Steve Hall  
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American Council of Engineering  
Companies



Jimmy Christianson  
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Associated General Contractors of  
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### Comment Template for Draft CMMC Model v0.4

Suspense for comments: 25 September 2019 at 1700 EDT

Send comments to the following email address: [osd.pentagon.ousd-a-s.mbx.cmmc@mail.mil](mailto:osd.pentagon.ousd-a-s.mbx.cmmc@mail.mil)

Point of Contact	
First Name	Dave
Last Name	Drabkin
Organization	Council of Defense and Space Industry Associations (CODSIA)
Position	Administrator
Email address	<a href="mailto:codsia@codsia.org">codsia@codsia.org</a>
Phone #	703.927.1116

\*Comment Type: C: Critical; S: Substantive; A: Administrative

#	Comment Author	Comment Type (C,S,A)	Page	Domain	Capability	Practice or Process	Level	Comment (Including Rationale)	Suggested Change
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**COUNCIL OF DEFENSE AND SPACE INDUSTRY ASSOCIATIONS**  
**4401 Wilson Boulevard, Suite 1110**  
**Arlington, Virginia 22203**  
[codsia@codsia.org](mailto:codsia@codsia.org)  
[www.codsia.org](http://www.codsia.org)

25 Sep 2019

Honorable Kevin Fahey  
Office of the Assistant Secretary of Defense for Acquisition  
3600 Defense Pentagon, Room 3E185  
Washington, DC 20301-3600

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Thank you for your attention to these comments. If you have any questions or need any additional information, please contact Dave Drabkin, CODSIA at: [codsia@codsia.org](mailto:codsia@codsia.org) or by phone at: +1.703.927.1116.

Sincerely,



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American Council of Engineering  
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### Comment Template for Draft CMMC Model v0.4

Suspense for comments: 25 September 2019 at 1700 EDT

Send comments to the following email address: [osd.pentagon.ousd-a-s.mbx.cmmc@mail.mil](mailto:osd.pentagon.ousd-a-s.mbx.cmmc@mail.mil)

Point of Contact	
First Name	Dave
Last Name	Drabkin
Organization	Council of Defense and Space Industry Associations (CODSIA)
Position	Administrator
Email address	<a href="mailto:codsia@codsia.org">codsia@codsia.org</a>
Phone #	703.927.1116

\*Comment Type: C: Critical; S: Substantive; A: Administrative

#	Comment Author	Comment Type (C,S,A)	Page	Domain	Capability	Practice or Process	Level	Comment (Including Rationale)	Suggested Change
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**Arlington, Virginia 22203**  
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25 Sep 2019

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Office of the Assistant Secretary of Defense for Acquisition  
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Point of Contact	
First Name	Dave
Last Name	Drabkin
Organization	Council of Defense and Space Industry Associations (CODSIA)
Position	Administrator
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