1) I think a good addition in "Data Inventory and Protection Attestations" would be providing users information on which cloud providers if any and in what regions sensitive data shared by the users would be shared.
2) Adding attestation that communication protocols be it device and user, device and device etc. should include encryption in transit. This is 2021 and I am surprised when devices don't' use TLS etc. This should be in "Critical Cybersecurity Attributes and Capability Attestations".
3) How is software integrity and provenance adhered in case of white labeled IOT products. Example: you use a 3rd party IOT device and white label it with your brand and sell it? There should be criteria on who signs it and till when it should be valid and who is responsible for the software integrity.

Regards,

Ayu