This feedback is from the GIAC Certification program and is broken out by the numbered items as you had listed on the NICE Request for Comments website.

Improvements to the NICE Framework

Topic area # 7. Describe any improvements that might be made in the current organization of the NICE Framework and its major components such as Categories, Specialty Areas, Work Roles, Knowledge, Skills, Abilities, and Tasks.

GIAC Program feedback: Stop adding new components and layers to the framework and first start removing some things. More complexity equates to more confusion. At the very least, any addition should require a subtraction.