To: Office of the Secretary and National Institute of Standards and Technology, U.S. Department of Commerce

From: International Biometrics & Identification Association (IBIA)

Re: Notice of Inquiry: Models for a Governance Structure for the National Strategy for Trusted Identities in Cyberspace (NSTIC)

Date: July 22, 2011

Submitted to NSTICnoi@nist.gov by email on July 22, 2011

Structure and Functions of a Persistent and Sustainable Private Sector-Led Steering Group

We would recommend that the Steering Group include no more than 21 members, in order to provide for a manageable governance capability. Also, as discussed at the NSTIC Governance Workshop, it will be necessary for the Department of Commerce to provide active administrative support to manage the Steering Group at the beginning of its establishment and through its initial work. This is critical to ensuring that the Steering Group functions in a transparent and inclusive manner. It is also, from a practical standpoint, the most efficient way to begin. The financial support from the private sector to sustain the administration of the Steering Group can be considered at a later date, once the Steering Group is established and work efforts been initiated.

It will be necessary for the Steering Group to oversee the development of the standards and policies for the Identity Ecosystem Framework. As such, it will be necessary to depend on and have work performed toward this effort by as many interested private participants as possible. Therefore, the Steering Group, in terms of its structure and function will (1) create Steering Group subcommittees to address various relevant areas, (2) assign deadlines and reporting dates for the subcommittees, (3) ensure the outcomes of the subcommittees’ efforts are in keeping with the overall direction they were given and provide work products in accordance with the guiding principles of the Identity Ecosystem Framework, and (4) publically report on an ongoing basis the outcomes of these efforts.

All Steering Committee meeting should be public. All interested parties shall be eligible to serve on subcommittees.
Initial Establishment of the Steering Group

Because of the long-term nature required for the development of the Identity Ecosystem Framework and to ensure maximum participation of the Steering Group, the 21 members should be term limited to three-year staggered terms – with one-third of the membership rotating on an annual basis. Steering Group members can serve again after being off the Steering Group for at least one year.

Appointments will be made based on expressions of interest with efforts to provide as diverse a representation as possible. The initial Steering Group should be selected by the Department of Commerce based on interest. Consideration following consultations with the public, other relevant Government agencies, and Congress could be given to determine if a different selection process is desired. For the initial Steering Group, one third of the members should be appointed for three years, one-third for two years, and one-third for one year.

IBIA strongly recommends that the Steering Group include representatives of the enabling technologies, such as biometrics and encryption. This is important because these technologies will be key components of an Identity Ecosystem, and it is efficient and productive to include representatives of these industries at the outset.

IBIA is a non-profit trade association based in Washington DC USA that represents the collective interests of providers of technologies and solutions for identification and identity verification—including biometric technology providers—as well as identity infrastructure and solution providers, systems integrators, commercial and consumer end users, technology associations, standards associations, policy, academic and research institutions.

Best regards,

Walter Hamilton
Chairman and President