Date: June 5, 2008 Document: App

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup> / # (e.g. FBI/1)	Clause No./ Subclause No./ Annex (e.g.3, 3.1, Annex A, A.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com- ment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Proposed Editors Disposition  LEAVE THIS COLUMN BLANK
FBI 1	All		te	The EBTS is still under revision and will go through another version change soon so referring to EBTS 8.002 might become confusing at some point in the near future.	Reference EBTS without a version number.	Reject. The specific version list currently operational features.
FBI/2 13	Ge		ge	Sections 7 and 8 do not align with section 6 in regards to the placement of tables 7.1 and 8.1 within those sections.	Not sure which is better, but the three sections should be consistent with regard to the location of these tables.	Order sections to be similar in physical location
FBI/3 1			Ge	Doesn't' seem to be much specific information regarding minutiae v/s images – interoperability between different systems. Readers of this document may not recognize the difference Perhaps a separate section regarding this topic could be included in this document.		In the Intro Emphasize this document is primarily for images rather than minutiae or other template for other modalities. Include in table1 Type 4 or 14 record types under standard.
MOT 1	Ge		Ge	What is the expected implementation time frame?	Provide expected implementation time frame.	Reject.
ITAL/ 8	Ge		Ge	There are existing ISO Standards (19794-X) that already covers some requirements described in the draft.	Refer to existing ISO standards if the subject has already been covered by ISO.	Create a reference/bibliography. Specific contributions welcome. Link reference when appropriate.
BPRA 1	Ge		Ge	Consistency in document terminology	Use 'enrolment, identification, and authentication' throughout. Sometimes the phrase 'enrolment, authentication, and identification' is used'.	Accept. Verification should be substituted for authentication.
BPRA 3	Ge		Ge	System needs possibility of extensions to other modalities built in.	Palm? Mobile DNA analysis systems, next 3-5 years?	Reject. Updates will address additional biometrcs.
BPRA 4	Ge		Ge	Cross Match, Identix, I3 ID Flats fingerprint capture devices are currently carried into the field for mobile	'Mobile' needs some definition work.	Reject.

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				capture. A laptop PC is mobile, while a desktop PC isn't?		
BPRA 6	Ge		Ge	Standards for interoperability are certainly referenced repeatedly, as are FBI certification standards for fingerprint devices.	Don't apologize for preparing the way for standards – use the 'best practice' term as a currently useful place holder for what is fully expected to be a set of standards in the near future.	Correct notion that APB wanted standards when it was really wanted a BPR.
BPRA 8	Ge		Ge		Need a full bibliography.	Accept. Contributions gratefully accepted
BPRA 2	Ge	Title page	Ge	Many of the topics covered in the document refer to parts of the capture system beyond just the device: software, communications, etc.	Replace 'device' with 'system'.	Add to scope: focus of document is device and its connection to broader secure systems.
						Eliminate specification from title.
WK 4		Title		Change title to:	Mobile ID Device Best Practice Recommendation & Specification	Accept Put year of 2010 as target forward looking date for document. Correlate with Tony Misslin
Noblis/	TOC		ed	Include a list of tables and figures	Include a list of tables and figures	Accept.
TXDPS 1	1 - Intro	1 <sup>st</sup> paragraph, 6 <sup>th</sup> line	ed	HUMVEE should not be all caps – it is not an acronym. It is slang for High Mobility Multipurpose Wheeled Vehicle or HMMWV.	Replace HUMVEE with Humvee.	Accept.
NPIA/	1 - Intro	2 <sup>nd</sup> sentence	ed	Wording –	'it may consist of an untethered device which is	Accept.

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1				'In the strictest sense, it may require an untethered device used to capture one or more'	used to capture one or more'	See BPRA 4
CMT/	1	3 <sup>rd</sup> Sentence	ge	Intent of 3 <sup>rd</sup> sentence not clear (really the 4 <sup>th</sup> )	Add "repository" before " in a nearby vehicle"	Accept.
FBI/2 1	1	Para. 3	ed	Second sentence "enables" should be "enable"		Accept.
NPIA/ 2	1- intro	3 <sup>rd</sup> para	ed	Wording –  'If a match is not found, an access or privileges may otherwise be denied.'	'If a match is not found, access rights or privileges may be denied'	Accept. See CMT 2
CMT/ 2	1	3 <sup>rd</sup> par next to last sen.	ge		Remove "otherwise"	Accept.
TXDPS 3	1- Intro	3rd Paragraph, 16th line	te	DHS may take action on a hit or a no hit, depending upon which database is searched.	Modify sentence to indicate that depending on the database searched, DHS may use the result (hit or no hit) to deny an access or a privilege.	Accept. Change to read:  If a match is not found, an access or privileges may etherwise be denied depending on the application or database searched.
FBI/1 4	1	Paragraph 3	ed	Incorrect punctuation.	Remove second period after "future"	Accept. Do global search for double periods.
TXDPS 2	1- Intro	3rd Paragraph, 14 <sup>th</sup> line	ed	There are two periods after the word "future".	Delete extra period.	Accept.
MOT 2	1	Paragraph 3	ed	Line 14 in the 3 <sup>rd</sup> paragraph ends with 2 periods.	Remove double period.	Accept.

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TXDPS 4	1 - Intro	6 <sup>th</sup> paragraph, 11 <sup>th</sup> line	Ge	Sentence indicates that this document will address best practices for current equipment and prescribes an approach that defines standards to which future acquisitions should adhere. While this is a good idea, the rest of the document is not consistent with the APB recommendation to the IS and IIETF for the development of best practices associated with the use of currently available equipment in specific.	Best practices for current systems need to be addressed. I see this as being along the lines of standards for scanner development. With IQS we had Appendix F (where we wanted to go) vs Appendix G (what was available at the time). The same type of approach should be utilized here. Some of the best practices would involve practices for systems that support the mobile device (AFIS, etc)	Add additional section 6.4 addressing how processing can improve accuracy of existing device. Mike Lesko will head up effort with help from vendors.
TXDPS 5	1- Intro	7 <sup>th</sup> paragraph, 4 <sup>th</sup> line	te	Sentence indicates that, for IAFIS or NGI, INCITS standards can be used. It needs to indicate that INCITS standards will only be used for modalities not defined in ANSI/NIST- ITL 1-2007.	Modify sentence to read " or INCITS standards (for modalities not defined in ANSI/NIST- ITL 1-2007).	Accept. Use INCITS/ISO standards.
BPRA 5	Ge		Ge	Access control in many current applications does not follow FBI/NIST standards. Not AFIS oriented. May use BioAPI.	Avoid tying specifications to AFIS or NGI, or comparable contexts.	Reject. This is not for access control apps. Interoperability is a prime objective. Use ANSI/NIST standard.
Noblis/ 2	Intro	last para	te	Does "series of profiles" refer to Biometric Acquisition Profiles (BAP), Subject Acquisition Profiles (SAP), or application profiles like those defined by INCITS M1?	State clearly what is meant by "profiles", i.e. Biometric Acquisition Profiles (BAP), Subject Acquisition Profiles (SAP), or application profiles like those defined by INCITS M1	Partial Accept.  Provided a generic definition for profile. It was used as a generic term. Definitions of BAP & SAP given in following Scope section.
NPIA/ 3	2 - Scope		te	While the focus of this report is on the use of mobile ID to identify 'suspects', in many applications it is equally important that the operator of the device is properly	Suggest adding a sentence to the scope pointing out that accurate user authentication is also an important factor and is within the scope of this	Reject.  Although very important, user authentication is

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				authenticated.	document, even though the main focus of the report is concerned with identification of 3 <sup>rd</sup> parties.	addressed later in the document. It doesn't seem to belong in the Scope.
TXDPS 6	2- Scope	1 <sup>st</sup> paragraph, 4 <sup>th</sup> line	ed	"Often, these applications typically" Use of often and typically is redundant.	Delete "typically".	Accept.
LM/ 1	2.0	P7, pp1	ge	Use of term "court challenges" may cause company lawyers to refuse to participate	Perhaps tone down implication that it must satisfy court challenges	Accept. Reword with a tone of possible court challenges.
TXDPS 7	2 - Scope	2 <sup>nd</sup> paragraph, 3 +4 <sup>th</sup> line	ed	"sets of best practices requirements"??? Are they best practices or requirements?	Delete "requirements".	Accept. Change to recommendations
BPRA 7	Ge	Scope, para. 2	Ge	Interoperability should be the main focus. Improvements in image capture processes, image quality, and accuracy are driven by other factors in the marketplace much more than standards.	Purpose is too broad. Data quality won't be improved by a best practice or standard, unless we say that mere size of an image is a major ingredient of image quality.	Reject
COGT 1	2	3	ge	The last sentence of this paragraph is "As the BAP numbers increase, so do the capabilities of the device".  There are no "BAP numbers" defined in this draft. Does this sentence mean "As the SAP numbers increase"?		Accept. Yes.
Noblis/3	3	1 <sup>st</sup> para	te	At a high level, Clause 3 speaks to capture (Clauses 6-8), use (Clause 9), security (Clause 10), and transmission (Clause 11) of mobile identification data, but it does not include environmental requirements (Clause 12).	Replace: This specification provides guidelines for the capture, use, security, and transmission of mobile identification data that can be interoperable with similar and dissimilar systems. with:	Partial Accept.  Are 'clauses' or 'sections' more appropriate for this BPR?  Use sections rather than clause.

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					This specification provides guidelines for the capture (Clauses 6-8), use (Clause 9), security (Clause 10), and transmission (Clause 11) of mobile identification data that can be interoperable with similar and dissimilar systems. It also provides guidelines for environmental requirements for mobile identification devices (Clause 12).	Remove 'specification' from document – global.
FBI/2 2	3	Para. 1	ed	Second to last sentence "of" should be "on"		Accept.
TXDPS 8	3- Purpose	1st paragraph, 9 <sup>th</sup> line	ed	"Choice of the level will depend of"	Change "of" to "on"	Accept.
MOT 3	3	Paragraph 3	Те	When will EBTS Version 8.002 be supported by the FBI?	Provide date EBTS Version 8.002 will be supported by the FBI.	Reject.  The FBI is currently accepting all supported transactions and fields listed in EBTS 8.002 that are not marked as "future capability"
CMT/3	4	4 <sup>th</sup> bullet	ed	Spelling of "building"	Add the g to spell "building"	Accept.
FBI/1 1	4	Bullet 4	ed	Incorrect spelling.	Correct spelling of "buildins" to "buildings"	Accept.
L1/ 1	4, P. 8	4 <sup>th</sup> bullet	ed		Change "buildins" to "buildings"	Accept.
TXDPS 9	4-Appl.	1st paragraph, 4 <sup>th</sup> bullet	ed	"buildins" This document will be used outside of West Virginia – there should be a "g" in this word!	Change to "buildings"	Accept.
NPIA/ 4	4 - Applicabil	1 <sup>st</sup> bullet	ed	The use of the word 'watchlist' implies a targeted search of a subset of data, whereas in many cases a mobile	Delete 'watchlist' or reword to 'check against one or more biometric databases and / or	Accept.

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	ity			search may be against a national database.	watchlists'.	
NPIA/ 5	4 - Applicabil ity	4 <sup>th</sup> bullet	ed	'Access control' may apply to both 3 <sup>rd</sup> party users (subjects) and also to the operators of mobile devices	Reword – 'Access control for buildings, computers and networks, both for 3 <sup>rd</sup> party users (subjects) as well as to authenticate the operator of the mobile device itself.	Accept.
NPIA/ 6	4 - Applicabil ity	Bullets	ed	Mobile ID may also be used as part of process for the enforcement of arrest warrants to ensure that the correct person is being arrested.  Mobile ID is also extremely useful when deployed at high profile public events (for example - football matches, G8 summits, music festivals etc).	Add extra bullets:  - 'Enforcement of arrest warrants'  'High profile, major public events, where fixed ID systems may not be practical or appropriate'	Accept.
NPIA/ 7	4 - Applicabil ity	Final Para	te	There is no mention of 'voice' and yet speaker recognition, especially if combined with speech recognition, can provide the capability to continuously authenticate the user as well as for voice activated control of the device / system.  There may also be occasions where it is useful to be able to take a voice / speech sample of the subject, either for immediate comparison or for later use.	Include a sentence on voice as part of longer term mobile biometric capabilities, even though detailed analysis is not within scope of this document.  (Or alternatively add it to the scope!)	Reject.  Scope of this version of document only addresses fingerprints, faces, and irises.
MOT 4	5.1	Paragraph 1	ed	First sentence – there is an extra space after "processing" before comma.	Delete extra space after "processing" before comma.	Accept.
FBI/1 5	5.1	Paragraph 1	ed	Incorrect punctuation.	Remove trailing space after "processing ,"	Accept.
NPIA/ 8	5.1 - Functions		Те	While the focus of this document is on mobile devices, these cannot be considered in isolation. The document would benefit from a more thorough analysis of the issues surrounding the 'middle' and 'back' end systems, and the implications on system architectures of adopting particular mobile solutions.	Include a more detailed discussion of the 'end to end' process, and requirements of other parts of the overall system (either as a new section or as an annex)  See attached logical architecture diagram	Accept.  John Flahive might provide new section with text. After review.

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						Sent Geoff rewrite for review
LM/ 2	5.1	P10, diagram	ed	Immediate look at figure is not clear where networks come into play.	Add the word "network" within the clouds in the diagram. Perhaps put "stand-alone" as subnote to (a).	Accept.
NPIA/	5.1 -		ed	The diagram would benefit from some explanatory text	Expand supporting text	Accept.
9	Functions			and perhaps also better distinction between what is 'local' and what is 'remote'.	Add reference	Need a caption. For figure.
				What does 'signal processing' entail - image processing / feature extraction / encryption ?		Adjust text.
				Diagram also needs a Ref adding.		
MOT 5	5.1	Graphic	te	Example (b) in the graphic does not logically make sense to have the network between Matching and Decision because the Matching and Decision should be together.	Remove example (b) from the graphic.	Reject. But clarify with action to replace decision.  Dale Hapeman will supply extra text.
FBI 2	5.1		Те	The document talks about a database on the capture device and this implies that this is allowed as a best practice when this should really only be a last resort (if then) practice.	Re-write section 5.1, including picture, to remove reference to a database on the capture device.	Reject.
CMT/4	5.1	Functions over networks	Te	Decision on Device, there is no recommendation on how to ensure database download is secure and trusted.	Need to specify encryption and digital signature for download of Database (Watchlist) on device.	Rich CMT will accept contributions and forward them to me. May get a new home in section 10 tbd.
CMT/5	5.1	Functions over networks	Те	(a) Decision made on mobile device but not logged.	Recommendation to log the device decisions	Dale will address loading, updating data, logging of transactions, etc. as part of business processes.

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CMT/6	5.1	Functions over networks	Те	Need an (a.5) – Need a method/network to pass decision on to central repository	Add additional network security (SAML) to pass decision to repository SAML (Security Assertion Markup Language) is an "XML-based communications framework for secure domains".	Reject
CMT/7	5.1	Functions over networks	Те	Need an (b) – Need a method/network to pass match score on to central repository	Add additional network security (SAML) to pass match score to repository SAML (Security Assertion Markup Language) is an "XML-based communications framework for secure domains".	Reject
CMT/8	5.1	Functions over networks	Те	( c) & (d) – there is no security recommended for passing of the EFTs	Need to identify some security method via digital signature and encryption	Reject
CMT/9	5.1	Functions over networks	Te	There is no indication of any key management scheme for data encryption	Need to identify key management for data encryption passing between device and central database.  Perhaps a second key scheme is needed for the in-vehicle database also.	Reject.
Noblis/	5.1	figure	ed	The figure "Functions over Networks" is not captioned.	Add a caption to the figure.	Accept.
Noblis/	5.2	figure	ed	The figure "Physical Architecture" is not captioned.	Add a caption to the figure.	Accept.
FBI/2 3	5.2	Para. 3	ed	Bullets describing the two types of sensors seem to be missing words.		See next 2 comments
FBI/1 6	5.2	Paragraph 3	Ed	Sentence in first bullet is nonsensical.	Change to "A Peripheral device where the biometric sensor <b>is connected</b> via a standard interface (e.g., USB connection)."	Accept
FBI/1 7	5.2	Paragraph 3	ed	Sentence in second bullet is nonsensical.	Remove the word "that" from the sentence.	Accept

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NPIA/ 10	5.2 - Physical	3 <sup>rd</sup> para, 1 <sup>st</sup> bullet	ed	Wordingthe biometric sensor via a standard interface	Change to 'the biometric sensor is connected via a'	Accept
CMT/10	5.2	Physical Architecture	ed	Box not large enough for text " Data Capture"	Enlarge box to show full text	Accept.
NPIA/ 11	5.3 Data Format	1 <sup>st</sup> bullet	ed	Data formats may vary depending on whether data is being sent from, or returned to, the device	Change to 'Format in transport, both for transmitting and for receiving data'	Accept.
L1/ 2	5.3, P. 11		te		Add bullet for "Encryption, both storage and transmission"	Accept.  Data security for storage and transmission security.
Noblis/ 6	6 7 8		ge	Recommend consistent approach to defining requirements for SAP levels. Clause 6 specifies "capture and transmission", Clause 7 specifies "capture and interchange", and Clause 8 specifies "capture, interchange, and matching".	Apply consistent approach to definition of SAP levels for face, finger, and iris image capture devices.	Accept. Table 5 delete last line.  Table 1 change transmission to interchange.
FBI/2 4	6.1	Para. 1	ed	First sentence, "a high quality images", "a" should be stricken or "images" changed to "image"		Accept.
BPRA 9	Ge	Fingerprint capture devices	Ge	Other things equal, a larger image is better than a smaller image, and images of more fingers are better than images of fewer fingers. This is not about quality, but about quantity.	'High quality' confusing in use in the document. A PIV device that has a platen size of .5"x.65" may produce a very high quality image, just a small one. And a single finger device may produce an image that is equal in quality to the 4 fingerprints produced by a 4-4-2 scanner.	Noted.

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NPIA/ 12	6.1	6 <sup>th</sup> sentence	te	There may be occasions when fingerprint images with a NFIQ of 4 or 5 are all that can be obtained. Whether or not they should be used for enrolment is dependent on the particular business process.	Change 'should not be used for enrolment' to should not <i>normally</i> be used for enrolment'	Accept.
TXDPS 10	6 –Mobile ID Devices	Chart, SAP5	ed	There is no entry for the "Acquire Rolled Images" row for SAP 5	Enter "No" into the "Acquire Rolled Images" row for SAP 5	Accept.
ITAL/ 1	6.1	Table 1	Те	Minimum resolution tolerance for SAP Levels 5 to 30 (+/-5 ppi or 1%) is not in line with PIV sensor specifications.	Minimum resolution for SAP Levels 5 to 30 should be 500 ppi +/- 10 ppi (2%).	Accept.  Use 2% / 10 ppi for levels 5 through 30. Create level 45 which is the old 40. New 40 is 2% and PIV. Footnote to effect tolerance linked to PIV or ANSI/NIST
ITAL/ 2	6.1	Table 1	Те	Specifying only the minimum number of greylevels does not guarantee an image with good contrast.	A requirement for the minimum dynamic range should be added (i.e. >=80).	Reject. Covered by PIV or App F
MOT 6	6.1	Table 1	Те	For multiple finger submissions, are simultaneous slap captures supported, e.g. fingers 2 and 3?	Define if simultaneous slap captures are supported.	Add word simultaneous fingers (not images) in row 9 of tab 1.
FBI 3		Table 1	te	Include the "best practice" fingers to include in order to achieve interoperability with most systems. I know this has been discussed at the meetings but I think it is important information to include. It may be an important bit of information for people just beginning mobile ID.	Table should include the best practice finger (ie. 2, 7) that should be included for interoperability.	T. Hopper will develop method of expressing different finger numbers captured simultaneously.  Mike L will create section 6.5 advice on fingers to

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FBI/1 8	6.1	Table 1	ed	Label is ambiguous.	Suggest changing 9 <sup>th</sup> row title from "Number of fingers or images" to "# of simultaneous fingers", to avoid misinterpretation.	Accept.
NPIA/ 13	Table 1		ed	Target Compression ratio can give the impression that images <i>must</i> be compressed by this amount, whereas this is better thought of as a <i>maximum</i> compression ratio.  'Number of Fingers' would be better labelled 'Max No. of Fingers that can be simultaneously captured'	Change 'target' to 'maximum'  Clarify that Number of fingers refers to simultaneous capture	Partial Accept Change to average not target.  See FBI/1 8
L1/ 3	6.1	Table 1	Те	With the advent of zero tolerance policies, DAs won't prosecute without biometric evidence to verify the identity of a subject in court. Mobile booking (enrolling prints into AFIS databases and retention of demographics and photo) allows cite out of subjects. This is seen by many officers as more important than mobile identification.  The requirement to have Appendix F IQS for all enrolls will add significant size, weight, and cost to mobile devices. PIV quality levels are sufficient for AFIS matching. They are certainly sufficient for biometric verification in court.	Add an SAP 35 that is equivalent to SAP 40 with the exception that image quality requirements are PIV, vs. Appendix F.	See ITAL 1
COGT 3	6.1	Table 1	te	Sensor certification The tenth item in the "CAPTURE" section:  App F is proposed for SAP=40 while device of SAP=40 can be single finger device per current draft. Currently, FBI doesn't issue App F certification to single finger device. The certification for single finger device is categorized into PIV certification (see FBI website).	If the device supports only single finger capture, PIV certification is required. If the device supports two-finger capture, App F is required.	Noted.

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L1/ 5	6.1	Table 1	Те	Target Compression Ratio of 10:1 will increase the file size transmitted. 15:1 will maintain the image contents and reduce the file size.	Change the Target Compression Ratio for SAP 20 and 30 to 15:1.	Reject.
LM/ 3	6.1	Table 1	ed	Only image compression listed is WSQ	Should also list JPEG2000, especially for handling 1000-ppi images as described in 6.2.3 but not in the table	Reject.
Noblis/	6.1	1 <sup>st</sup> para Table 1	ed	Replace "M1 378" with "INCITS 378-2004"	Replace "M1 378" with "INCITS 378-2004"	Accept.
Noblis/ 7	6.1	Table 1	ed	"ANSI/NIST" is ambiguous.	Replace "ANSI/NIST" with "ANSI/NIST ITL 1-2007"  - or - Replace "ANSI/NIST-ITL 1-2007" with "ANSI/NIST-ITL 1-2007 [hereinafter ANSI/NIST]" in Introduction, paragraph 7.	Accept.
COGT 2	6.1	Table 1	te	Minimum image dimension The fifth item in the "CAPTURE" section:  The proposed dimensions for all but one single finger SAP levels are corresponding to a rectangular area with its height being larger than its width. The only exception is SAP=20, for which a square of 8' X .8' is proposed.  Because of the shape of human finger, a flat fingerprint tends to have a longer span vertically than horizontally when fingertip is pointing up or down. Therefore, a rectangular area with its height being larger than its width is the optimized solution for sensing area of singer fingerprint sensor. This should be taken into consideration	It is suggested that the requirements for SAP=20 to be modified to 0.6' X 0.8'.	Accept. Change area.

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				when the minimum image dimension for each level is defined.  SAP 5, 10 and 30 are already consistent with the optimized solution. It is suggested that the requirements for SAP=20 to be modified.		
CMT/11	6.2.1		ed	"± 5 ppi" should be same font point size as rest of text.	Change text format size	Accept.
FBI/1 9	6.2.1	Paragraph 1	te	Limiting options for the user/system integrator.	Suggest removing the second half of the second sentence that <b>requires</b> down-sampling to 500 ppi. We don't want to force this requirement and mandate a loss of resolution. There may be systems in the future that can handle and effectively exploit the additional detail in 1000 ppi imagery. Let's leave this one open to the system integrator.	Accept. 6.2.1 says down sample rather than profile 1000
NPIA/ 14	6.2.2 – Minimum Image Size	Last sentence	ed	Wording  'As the SAP level increases so does the size of the image and number of fingers captured'	Suggest changing to  'As the SAP level increases so does the overall size of the image and number of fingers which can be simultaneously captured.'	Accept
FBI/1 10	6.2.3	Paragraph 1	te	Limiting options for the user/system integrator.	Suggest adding the following to the last sentence: "that require 500ppi imagery compressed with WSQ."	Accept
Noblis/ 8	6.2.3	1 <sup>st</sup> para	ed	Replace "Profile for 1000ppi fingerprint" with "Profile for 1000ppi Fingerprint Compression"  Insert footnote or add reference to Profile for 1000ppi Fingerprint Compression, <a href="http://www.mitre.org/work/tech_papers/tech_papers_04/le">http://www.mitre.org/work/tech_papers/tech_papers_04/le</a>	Replace "Profile for 1000ppi fingerprint" with "Profile for 1000ppi Fingerprint Compression"  Insert footnote or add reference to Profile for 1000ppi Fingerprint Compression, http://www.mitre.org/work/tech_papers/tech_paper	Accept

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				pley_fingerprint/lepley_fingerprint.pdf	s_04/lepley_fingerprint/lepley_fingerprint.pdf	
NPIA/ 15	6.2.3 Compres sion Algorithm	2 <sup>nd</sup> sentence	ed	What is meant by 'Profile for 1000ppi fingerprint'?	Clarify what this means or add reference	See Noblis 8
CMT/12	6.2.4		te	The reference to "transcoded down to 100 ppi" is confusing. The best practice levels all are 500 ppi. Why mentioned 100 ppi?	Either explain the reference to 100ppi or alleviate it. Should this 100ppi be 500ppi?	Accept
FBI/1 11	6.2.4	Paragraph 1	Те	Incorrect value.	I think the last numeric value in this paragraph should be 500 ppi vice 100 ppi.	Accept
FBI/2 5	6.2.4	Para. 1	ed	100ppi should be 500ppi?		Accept
Noblis/ 9	6.2.4	1 <sup>st</sup> para	ed	Replace "transcoded down to 100 ppi" with "transcoded down to 500 ppi"	Replace "transcoded down to 100 ppi" with "transcoded down to 500 ppi"	Accept
MOT 7	6.2.4		Те	Are the compression ratios on average or will any submission with a compression ratio larger than 10:1 (for SAP levels 10, 20, or 30)/15:1 (for SAP levels 40 or higher) be rejected?	Define if compression ratios larger than 10:1 or 15:1 will be rejected.	CR based on averages.
L1/ 6	6.2.4		Те	Same as L1/5.	Change 6.2.4 to read "For small area images, less than .7" x .6", the maximum compression ration to be used is 10:1. For larger image areas compression ratio may increase to 15:1."	Withdrawn.
MOT 8	6.2.5		Те	When will Appendix F certification of sensors be available (when will a procedure be defined to start issuing this certification)	Define Appendix F certification.	Withdraw.
L1/ 7	6.2.5		Ed	Need to clarify "smaller sensors".	Change "Smaller sensors should have the PIV" to	Change to 40 and below.

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					"Sensors with SAP levels below 40 should have the PIV".	6.2.5 change 40 to 45
FBI/1 12	6.2.6	Paragraph 1	ed	Incorrect syntax.	Change "compliance" to "compliant".	Accept
NPIA/ 16	6.2.6 Extractor Cerificati on		te	Is one SAP level enough for minutia based searching?  Bandwidth restrictions may mean that a sensor meeting SAP 40 (or above) may be installed on the device but it is not possible to transmit the image(s) over the network  A MINEX certified extractor is mandated for minutia based searching for interoperability, but No 9 in Table 2 states that SAP5 is not intended for use between systems.  While MINEX may be best for interoperability, this may not be the key factor in some applications or environments and there may be applications where other extractors are better suited.  This report as a whole does not really include any discussion of minutia based searching, focussing almost entirely on the use of images.	Include a section discussing the advantages / disadvantages of using minutia in conjunction with mobile ID.	Geoff will develop contribution on this topic.
Noblis / 10	6.2.7	1 <sup>st</sup> para	ed	Replace "the INCITS 378 minutiae data format standard developed by the M1 committee" with "INCITS 378-2004"	Replace "the INCITS 378 minutiae data format standard developed by the M1 committee" with "INCITS 378-2004"	Accept. In tab 1 last line use A/N Type 9 record with 378 field descriptions.
NPIA/ 17	6.3 – Use Cases and Table 2		te	More explanation of how to interpret this table would help.  For example - Whether or not 2 fingers is sufficient for a moderate (or even severe) level identification depends on the size (and quality) of the database(s) being searched, as well as the supporting business processes.	Expand Use Cases and/ or add additional supporting text	Have Tony Misslin give more textual description of the use table. Emphasize examples.
FBI/1 13	6.3	Table 2	ed	Misplaced information in table.	Remove the "/" and the second numeric value in	Accept.

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					the "SAP Levels" column. Remove the "/" from the remaining entries in the SAP Levels column.	
LM/ 4	6.3	Table 2	te	Fingerprint use case 1 (severe/enrollment) uses 10 fingers, but it's not immediately clear that the profiles in Table 1 support a 10-finger capture device. I believe the intention of "Number of fingers or images" row in Table 1 for SAP levels 40-60 actually represent slap images rather than single-finger images.	Clarify content of "Number of fingers or images" row in Table 1. Perhaps adding a "Maximum number of fingers" row would suffice.	Accept.
COGT 4	6.1	Table 2	te	Number of fingers enrolled are proposed to be 6+ and 4+ for cases of 'moderate' and 'mild', respectively. That is, not all 10 fingers are enrolled. Therefore, knowledge of finger position is very important at the time of identification/verification.	It will be helpful if preferred finger positions for enrolment fingers are specified. It is suggested that the number of fingers are evenly divided over two hands.	Mike Lesko will take care of this.
COGT 5	6.1	Table 2	te	Number of fingers required for 'moderate/identification' is 4+ while the corresponding 'number of fingers enrolled' is 6+. It might be beneficial in terms of usability if the number of fingers required for identification is set to be half of the number of enrolled fingers (3+ in this case) so that it is possible to use fingerprints from one hand for search.	It is suggested to change 4+ to 3+ in row no. 5 (moderate/identification).	Reject
L1/ 4	6.3	Table 2	Те	Same as L1/3.  With the advent of zero tolerance policies, DAs won't prosecute without biometric evidence to verify the identity of a subject in court. Mobile booking (enrolling prints into AFIS databases and retention of demographics and photo) allows cite out of subjects. This is seen by many officers as more important than mobile identification.  The requirement to have Appendix F IQS for all enrolls	Change the SAP level for entry no. 4, Moderate Enroll, to 35+.  Alternative would be to change entry no. 4, Moderate Enroll SAP to 30 and eliminate L1/3.	Withdrawn.  Accept 2 <sup>nd</sup> part.  SAP 40 is now aimed at PIV certification. Old 40 is now 45

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# Title: Comments on: MobileID-BPRS-20080505.pdf Contact: Michael McCabe rmmccabe@Comcast.net

Date: June 5, 2008 Document: **Approved Resolution of Comments** 

1 2 (3) 4 5 (6) MB1/# Clause Paragraph/ Type Comment (justification for change) by the MB Proposed change by the MB **Proposed Editors Disposition** Figure/Table/ No./ of LEAVE THIS COLUMN BLANK (e.g. Subclause Note com-FBI/1) ment<sup>2</sup> No./ (e.g. Table 1) Annex (e.g.3, 3.1, Annex A, A.1) will add significant size, weight, and cost to mobile devices. PIV quality levels are sufficient for AFIS matching. They are certainly sufficient for biometric verification in court. L1/8 6.3 Table 2 The "SAP Levels" column includes (in some lines) the Eliminate all but the SAP levels from the column Accept ed number of finger references. labelled "SAP Levels". According to this table, devices with SAP Levels 5 and 10 Partial accept. See Mikel ITAL /3 6.3 Table 2 Te The table should be edited so that devices with are limited to verification only, in non-critical contexts. Our SAP Levels 10 can also be used for identification. Lesko text. experience is that, using PIV compliant sensors, with a good quality database, it is possible to perform also identification in a law enforcement context (criminal AFIS) with good results. Text for 6.3 will elaborate. FBI/1 14 6.3 Table 2 Te Insufficient rigor applied to selection of SAP level. Concerning row 3 (and the entire table, really), do we have test data that shows an acceptable See ITAL 3 accuracy level when performing an AFIS search with data from a .8x.8 PIV device? More generally, should we define a target FAR for each Reject. Data doesn't exist. use case and put this in the Notes column (i.e. Levels were based on what is an acceptable accuracy level for each professional experience. scenario)? It seems as though we should be Best guess data. applying a more quantitative approach to arriving at the suggested SAP levels, in order to give the chosen level more real-world meaning. FBI 4 Table 2 te What does "40+ / 10" mean in the SAP levels column? This is used in the first two rows of the table Accept. This was an error in without any explanation. Can be left in if it adds table that has been fixed. See FBI/1 13 meaning and is explained. NPIA/ Table 2 No 9 te If SAP level 5 is not intended for use between systems, Noted. 18 why insist on using MINEX certified extractors? (see To be revisited at a later NPIA 16) date.

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CMT/13	7			No indication of dynamic range of the camera image	Recommend dynamic range as; 60db/10 bit	Reject
			sensor. From my understanding this as important as the resolution because the camera will be used for outside operations and therefore varying light conditions can be expected.  recommendation: 60db/10 bit		Section 7.2.4 states that it is a minimum of 24 bits RGB or 8 grayscale. 2 <sup>nd</sup> sentence doesn't need the 8-bit reference.	
						Users may want to consider higher dynamic range for use in outdoor daylight situations.
						Insert 'minimum' in color space and grayscale Table 3
CMT/14	7		te		Explicitly state use case for facial images.	Reject.
				Capture and transmit or is there a capture and store on device needed?	Contributions will be considered for next round.	
CMT/15	7.1		te	It is not clear from the document where the image quality	Need to add Image quality statement in overview	Accept.
				check (according to ISO 19794-5 or ANSI/NIST Type-10) has to be done. Internally or externally of the device?	as done in section 6.1.	Contribution by Rich H. in very near future.
CMT/16	7.1, 8.1	Table 3,4, 5	Ed	Title of table font size needs to be enlarged	Enlarge font size of title.	Accept.
NPIA/	7.1 - Overview	1 <sup>st</sup> sentence		Suggested text –	Accept.	
19		and bullets			Mobile Identification devices may provide the functionality for capturing and / or displaying facial images for two distinct purposes:	
					Linking the return information to the correct subject (e.g. for subsequent	

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# Title: Comments on: MobileID-BPRS-20080505.pdf Contact: Michael McCabe rmmccabe@Comcast.net

Date: June 5, 2008 Document: **Approved Resolution of Comments** 

1 2 (3) 4 5 (6) MB1/# Clause Paragraph/ Type Comment (justification for change) by the MB Proposed change by the MB **Proposed Editors Disposition** No./ Figure/Table/ of LEAVE THIS COLUMN BLANK (e.g. Subclause Note com-FBI/1) ment<sup>2</sup> No./ (e.g. Table 1) Annex (e.g.3, 3.1, Annex A, A.1) manual verification of identity following a fingerprint search) Mobile Identification (using the facial image to search against a database of other facial images) 2<sup>nd</sup> sentence NPIA/ 7.2.1 ed There is no explanation given as to why the operator Add note explaining the value of taking operator Accept 20 Focal would want to take images of themselves. images (user authentication, audit trail etc) Length ITAL/ 6 Te If the lens focal length is increased (see previous In tab 3 remove the sensor 7.2.1 Increase minimum separation as required by the comment) the proposed minimum separation (2 feet) is lens focal length (approx. 1.5 m.). line – delete entire line. too low. Udo will rewrite 7.2.1 think about reg for cops, facial rec. and linking return of response. 7.2.1 Te CMT/17 Table 3 Table 3 specifies a focal length for a lens, which doesn't Take focal length out of spec or Is there an optical See ITAL 6 make sense. Spec states f = 40 to 135 mm and specifies resolution spec t others would recommend? Both capture distance of 600 to 2000mm. If I pick a 1280 x the iris and fingerprint specify both optical and 1024 array by 5.2 pixels I only get a 60 x 40 mm capture electronic resolutions. Shouldn't facial have an area using a 135mm lens at 2000 mm. What is important optical resolution spec? for a spec should be what the area to capture on the face and maybe the capture distance. After that, it's up to the design engineer to chose a sensor and based upon the sensor physical size (e.g., in mm) the magnification required is set, which will set the focal length. In other words, focal length changes based upon sensor size, so focal length shouldn't be part of the spec. This looks like a spec for a 35mm film camera! Need

specs for area size to be captured including boarder

areas around subject.

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MOT 9	7.2.3		Те	It says camera display rate of 15 fps, with 12 fps adequate. It then says "Facial recognition frame rates are typically 5-10 fps". What does that mean? Based on Table 3 under "capture device controls", the face requirements appear to mean continuous face detection. I realize hardware is always improving, but you are referring to 2010 and right now. Even if we had face detection, most likely it would be more in the realm of 1 to 2 fps.	Re-define frames per second specification.	In section 7.2.3 replace recognition with detection in the 3 <sup>rd</sup> sentence.  Remove 'requires continuous face detection' from capture device controls level 30
NPIA/ 21	7.2.6 – Camera Sensitivit y	Last sentence	te	Whether or not images are suitable for facial recognition does not directly depend on the sensitivity of the camera.	Reword final sentence – 'Images taken under such lighting conditions will not normally be of sufficient quality for automated facial recognition.'	Accept.
Noblis / 11	7.2.7	1 <sup>st</sup> para	te	Recommend citing specific sections and/or paragraphs of ANSI/NIST ITL 1-2007 for facial image compression guidelines.	Cite specific sections and/or paragraphs of ANSI/NIST ITL 1-2007 for facial image compression guidelines.	Accept. Noblis will provide input.
CMT/18	7.2.3	Table 3	te	The frame rate of 12 fps may be used for positioning (as proposed in the draft), but probably not for image capturing at full resolution. Although the device is specified for products in 2010, I do have my doubts that somebody would be able to provide a frame rate of 12fps for full resolution (which is about 4 Mega pixel (!!!) for Level 50)	If it is intended to provide two streams: for the face detection: min. 3 fps for live video stream: 10 fps (for VGA resolution, i.e. 640-480)	See Mot 9
Noblis / 12	7.3	1 <sup>st</sup> para	ed	Strike "This section is included for the purpose of compatibility with fingerprints!"	Strike "This section is included for the purpose of compatibility with fingerprints!"	Accept . Udo will develop use cases compatible with fingerprint.
NPIA/ 22	7.3 – Use Cases		ed	Facial images can be used in situations where fingerprints cannot be taken and this should be pointed out in the Use Cases.	Capturing facial images provides a non- contact form of ID for situations where physical contact may not be possible or	Add to section 7.3  Invite contributions for the use case capture at a

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					practical for whatever reason  2 Capture of facial images can be done at a distance and therefore provides the capability for covert mobile ID	distance
					3 Capturing facial images may be of more value than taking fingerprints in some circumstances. For example, CT databases / watchlists are more likely to contain facial images than fingerprints.	
L1 / F1	7	Table 3 (Face)	Те	values for sensor resolution are inconsistent	- relax inter-eye distance for level 51 to 300pxl (twice as many as in level 40) - increase relative centering error of level 30 from 50% to 72%.	Accept . >=72%
					- change minimum sensor sizes for levels 30, 40 and 51 to 400x533, 900x1200 and 1800x2400. Delete all other sensor size specifications.	Make image size rather . sensor size. Reject sensor size comment.
NPIA / 23	Table 3	Sensor resolution	ed	Why are two values given for resolution?	Explain what the second value means	Second row of values to be deleted.
BPRA 10	Face Use Cases	Table 3	Те		X+i: 51? Not 50?	Accept. Not 50
BPRA 11	Face Use Cases	Table 3	Те	More poses improve likelihood of a match. Mug shots have profile as well as frontal. Number of poses is in the next table, should be here.	Multiple 2D poses, at least one profile, maybe both, maybe 45 degrees?	Reject.
BPRA	Face Use	Table 3	Те	Formally an improvement though there are fits and starts	3D?	Reject.

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12	Cases			in applications.		
ITAL/ 4	7.3	Table 3	Те	A given image size can be obtained with sensors of different sizes, mounted in portrait or landscape modes. For example, an image of 768 x 1024 pixel can also be obtained by using a 1280 x 1024 pixel sensor mounted in landscape mode.	Remove the sensor resolution and the requirement that the sensor has to be mounted in portrait mode.	Accept to remove portrait restriction.
ITAL/ 5	7.3	Table 3	Те	The proposed minimum focal length of 40 mm (35 mm format) is too low (since it's equivalent to a mild wideangle lens) and this creates radial distorsion of the image.	The recommended lens focal length should be 2 to 3 times the sensor diagonal or approx. 90-130 mm (35 mm format equivalent). See ISO 19794-5 (Annex A, 2.8).	See CMT 17
NPIA/ 24	Table 3	Relative centering error	ed	What does this mean?	Add explanation	Accept. UDO will provide text
FBI/1 15	7.3	Table 3	Те	Multiple values for single parameter.	Are there supposed to be two values in each column for sensor resolution? This is confusing. I suspect the top numbers should remain, and we should delete the specs on the bottom. If both sets should remain, please label the row to clearly reflect what each value represents.	See L1 F1
NPIA/ 25	Table 4		ed	Many of the examples relate to fingerprints	Derive examples that are more relevant to faces	Udo will provide examples
NPIA/ 26	8 - Iris		ed	Considerable work still needed!	No suggestions at this time!	Noted.
L1 / F4	8	various locations	ed	The term "iris scan" falsely indicates that capturing an iris image involves linear scanning and laser light.	Replace all occurrences of "iris scan" by "iris image capture".	Accept.
L1 / F2	8	Table 5 (Iris)	Те	Columns 40 and 51 are incorrectly labelled with respect to the user convenience of the devices they describe. The columns should be ranked the other way around, so	Flip or re-discuss SAP labels.	SAG it.

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				that the device that enables touch-less capture of both irises gets a higher rank than the device that requires a mechanical alignment aid to be held against the subjects forehead.		
Noblis / 13	8.1	1 <sup>st</sup> para	ed	Non-sequitur	Strike "Iris capture devices have features similar to facial capture but with significant differences."  - or -  Explain the statement in greater detail.	Strike it.
CMT/19	8.1		ed	Take out bookmark error message in second sentence	Remove bookmark or link to proper source.	Accept
MOT 10	8.1		ed	Error – Reference source is not found	Fix error in reference.	Accept
FBI 5	8.1		Ed	Reference to table 5 has not been set correctly so an error is displayed in bold.	Set this reference to the correct table.	Accept
CMT/20	8.1	Table 5	te	SAP 51 Irradiance 40 w/M <sup>2</sup> should have a time limit	Add pulse flash with a value for max pulse width. There should be some caveat stated that refers to an eye safety standard to set an upper bound.	SAG See Table 6 (old Table5)
CMT/21	8.1	Table 5	te	For Level 30 recommendation states 160 pixels. Is there a reason why this document should differ from ANSI INCITS 379 that states 150 pixels for Medium Quality? For High Quality they state 200 pixels which matches your Level 40 and 51.	Refer to ANSI INCITS 379 standard 150 pixels at level 30	Change pixel but no reference.  See Table 6 updated by SAG but still doesn't agree with 379.
CMT/22	8.2.2		ed	Illumination spelling	Add the "I" between m&n in Illumination	Accept
CMT/23	8.2.2		te	Should refer to the Illumination standards and safety specification.	Refer to IEC 825 and ISO 60825-1	Accept
L1 / F3	8.2.2		Те	The infrared light used for iris capture may be visible to	Change sentence "The illumination is not in a	Accept

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				the human eye in some cases.	range visible to the eye." to "The illumination is in a spectral range only partly visible to the human eye."	
Noblis / 14	8.3	1 <sup>st</sup> para	ed	Strike "This section is included for the purpose of compatibility with fingerprints!"	Strike "This section is included for the purpose of compatibility with fingerprints!"	Accept
MOT 11	8.3		Ed	Iris section says use cases for "facial capture" not "iris capture"	Should be "use cases for iris capture"	Accept
CMT/24	8.3	Table 5	te	Table 5 states an image margin in percentage. Percentage of what? Is it percentage of the iris diameter? This border is less than the 70 pixels stated in ANSI INCITS 379-2004.	Please clarify what the percentage is from.	Iris Diameter.
BPRA 13	Iris Use Cases	Table 5	Те	Newer technologies, but arguably relevant to Mobile ID. Capturing from 6 feet may be more manageable than capturing from 18 inches, for instance.	Iris at a distance? Iris on the move?	Reject.
COGT 6	8.3	Table 5	te	The "number of eyes simultaneously captured" is proposed to be 2 for both level 40 and level 51. This means that all single-eye capture devices can only be level 30, no matter how good the device is in other features and how many other capabilities the device has.  While two-eye capture device can have advantages if the quality of the iris images it outputs is as good as its single-eye capture counterpart, the advantages are not significant enough so that this single capability ("two eyes simultaneously captured") can be a difference-maker by itself. Capabilities such as high SNR, larger iris diameter are more critical. Single-eye capture device that can have high performance on critical issues should be classified into higher level 40 or 51.	It is suggested that "number of eyes simultaneously captured" for all three levels to be set to >=1.	SAG. What to do with table for one vs 2 eyes.  One for level 20 & 30; two eyes for level 40

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COGT 7	8.3	Table 5	te	This draft does not specify if the output of 2-eye devices should be two iris images (one for each eye) or one image which contains two irises. Current requirements imply that both are allowed.	It is suggested that the document explicitly specify if both kinds of outputs are allowed.	SAG  Determined by camera design providing benefits of two-eyed camera can be achieved.
COGT 8	8.3	Table 5	te	The "capture distance in mm" is proposed to be >=100 for level 30, >=200 for level 40 and >=150 for level 51.  The desired capture distance varies from scenario to scenario. A combination of longer capture distance with smaller capture volume is not necessarily better than a combination of relatively shorter capture distance with bigger capture volume. So long capture distance alone is not a sure characteristic for high end device.	It is suggested that the requirements for this item to be changed to 100 for all three levels.	SAG Accept see table 6.
COGT 9	8.3	Table 5	te	For "image margins left, right / top, bottom of iris border: Are these values for maximum?	Please specify	Udo will provide text See table 6
CMT/25	8.3	Table 6	Ge	Table 6 has no SAP levels and # of eyes indicated	Add the following into table 6; 1) 40+, 2 2) 40+, 2? 3) 40+, 2? 4) 40+, 2 5) 40+, 1 6) 30+, 1 7) 40+, 2	SAG See Table 7

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					8) 40 +, 1 9) 30 +, 1	
CMT/26	9		te	no reason to be Fingerprint specific	Need to generalize for other biometrics; face & iris	Accept. Introduce face and iris modalities. Peter Higgins will rewrite Section 9 to include all modalities.
MOT 12	9		Ed	Table 1 only mentions up to 4 fingerprints. This bullet mentions from 2 to 10 fingerprints.	Define what number of fingerprints is actually required.	Tom H. and Mike L will make recommendtions.
FBI/2 6	9	Para. 2	ed	"differe" should be "differ"		Accept.
FBI/2 7	9	Para. 5	ed	First sentence, add "s" to "transaction"		Accept.
FBI/2 8	9	Para. 7	ed	Bulleted list, type 10 record to be included if photo requested	Could we add "and available"?	Accept.
FBI/1 16	9	Paragraphs	Ed	Misspelling and punctuation errors.	Found additional misspelled (e.g. differe s/b differ, identy s/b identity) words and multiple periods at the end of sentences. Please run spelling and grammar check.	Accept.
NPIA/ 27	9 – Transacti ons and Replies	5 <sup>th</sup> paragraph	te	The para refers to returned responses of fingerprint images of the candidate with the highest matching score. In many mobile scenarios, returning fingerprints will provide little operational benefit to the operator.  However, if facial images are available (either within the database being searched or in one linked to it) returning the facial image of the highest scoring candidate(s)	Add section on the value of returning facial images (where available) in response to finger or iris searches as well as face searches.	Accept. Peter H. will make contribution.

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				provides an effective way of determining whether or not the search has returned a true match.		
NPIA/ 28	9 – Transacti ons and Replies		te	This section appears to imply that the transaction will be ANSI NIST formatted in both directions. However, the response to a mobile enquiry is more likely to be basic demographic / biographic data (possibly with a facial image if available). It may also include data from intelligence databases, warning flags, medical conditions etc.  In many cases an ANSI NIST ITL2007 formatted response may not be the most appropriate means of sending the information to the mobile device.	?	Accept. Peter Higgins made contribution.  In the interest of interoperability, ANSI/NIST is assumed. The Type-2 record will address basic demographic data. Type-10 will take care of the facial image.
Noblis / 15	9		ed	Recommend creating subsections for Background (para 1-5) and Requirements (para 6-11)	Create subsections for Background (para 1-5) and Requirements (para 6-11)	Peter Higgins made contribution. See Rewritten Section 9
Noblis /16	9	2 <sup>nd</sup> para	ed	Туро	Replace "differe" with "differ"	Accept.
FBI/1 2	9	Paragraph 2	ed	Incorrect punctuation.	Remove second period at end of paragraph.	Accept.
FBI 6	9	2 <sup>nd</sup> Para	ed	Extra period at the end of sentence.	Remove extra period.	Accept.
MOT 13	9	Paragraph 2	ed	Paragraph ends with 2 periods.	Remove double period.	Accept.
MOT 14	9	Paragraph 3	Те	What is "a very quick response?"	Define desired response time.	Peter made contribution.  May still need discussion.
MOT 15	9	Paragraph 3	ed	Should be "issue the driver" not "issues the drive"	Change to "issue the driver".	Accept.

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Noblis / 17	9	3 <sup>rd</sup> para	ed	Subject-verb agreement	Replace "issues" with "issue"	Accept.
Noblis / 18	9	3 <sup>rd</sup> para	ed	Replace "identified terrorists" with "KSTs"	Replace "identified terrorists" with "KSTs"	Identified terrorists (such as KSTs) Global.
MOT 16	9	Paragraph 5	Те	Does the Mobile ID officer really want to perform image verification?	Further define the actual role of the Mobile ID officer.	Sec 9 par 5 line 7: add the word optionally: 'and optionally the correspond
Noblis / 19	9	para 6-11	te	What is the value add of this text over citing FBI EBTS 8.002?	Explain the value added by specifying the Type record requirements for a fingerprint-based search and fingerprint investigative search request response.	Noted.  Document needs to be for more than the FBI.  Peter's rewrite is more general.
Noblis / 20	9	last para	ed	Non-sequitur. If there are specific requirements for face image and/or iris image transactions and responses, specify them.	Strike "Although the above discussion was in regard to fingerprints, the same approach could be tailored for facial or iris image transactions. This is predicated on the fact that the receiving agency is capable of accepting and processing such transactions."	See CMT 26 Peter's rewrite is more general.
BPRA 14	Security & Encryptio n		Te	Not inherently about interoperability. Users of Mobile ID technology have their own security protocols. Unless we want to specify what interoperability means in the context of possibly incompatible encryption methods, we should not leave this in.	Why in this document?	Withdrawn.
Noblis / 21	10.1	1 <sup>st</sup> para	ed	Subject-verb agreement	Replace "Law enforcement and criminal justice is" with "Law enforcement and criminal justice are"	Accept

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FBI/2 9	10.1	Para. 1	ed	Sentence 4, ", however," is not needed and does not make sense.	Remove ", however,"	Accept
FBI/1 17	10.1	Paragraph 2	Ed	Sentence 2 is lengthy and nonsensical.	Replace with: This best practices document is intended to establish awareness of mobile handheld security problems and to specify "best practice" counter measures to defend against these threats. In addition, this document will identify key issues that an IT security manager must address while establishing a comprehensive handheld security policy.	Accept. Fix it.
NPIA/ 29	10.2 – Data Encryptio n		te	What about encryption of the responses? Arguably this is more important than encrypting the outgoing message.	Add section – 'Incoming Transmissions'	Remove outgoing from title. Change language to reflect encryption and decryption of bidirectional traffic. Replace shall with should.
FBI/2 10	10.2	Para. 2	ed	Second sentence is run-on and seems to be missing something around "and which issues an IT security manager"		Accept.
MOT 17	10.2.2		Те	Currently requires FIPS-140-2, which is only appropriate for Transmission encryption. This is incorrect. This should instead require a "Data-At-Rest" encryption product instead of FIPS 140-2. Below is a link to a list of GSA approved Data at Rest (DAR) Encryption methods: <a data-at-rest"="" encryption.<="" href="http://www.gsa.gov/Portal/gsa/ep/contentView.do?programld=8399&amp;channelld=18846&amp;ooid=22458&amp;contentId=23207&amp;pageTypeId=8169&amp;contentType=GSA_BASIC&amp;programPage=%2Fep%2Fprogram%2FgsaBasic.jsp&amp;P=SBUY&lt;/a&gt;&lt;/td&gt;&lt;td&gt;Include " td=""><td>10.2.2 Fips-140-2 certified or equivalent  Move last sentence of 10,1 to the beginning of 10.1  10.2.2 change title to Data at Rest.</td></a>	10.2.2 Fips-140-2 certified or equivalent  Move last sentence of 10,1 to the beginning of 10.1  10.2.2 change title to Data at Rest.	
L1/9	10.3		Те	Biometric user authentication and log on should be an	Eliminate the words "mobile devices shall" from this section and replace it with "mobile devices	Accept.

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				option on mobile devices, not a mandatory.  The mandatory requirement for user authentication then adds the need to specify the level of algorithm certification and needs to allow finger, face, or iris.  This is all very attractive but should be optional.	may provide capability to".	"devices should provide" Do a global shall to should.
NPIA/ 30	10.3.1 – User Authentic ation		ed	The word 'Operator' is used elsewhere in the document	Agree definitions and consistent terminology	Accept. Use user This was a global change
Noblis / 22	10.3.2	1 <sup>st</sup> para	te	In addition to alphabetical and numeric characters, allow for special characters.	Replace "alphabetical /numeric characters" with "alphabetic/numeric/special characters"	Accept
NPIA/ 31	10.3.2 – Biometric and Password		te	Best practice should require 2 factor authentication, preferably involving a biometric.  In many cases, users of such devices will have smartcards, either with or without biometric data on them Perhaps authentication requirements should be linked to SAP level or Use Cases?	Add note on smartcards.  Emphasise use of 2 factor authentication as best practice.	Augment both 10.3.I and .2 with 2 factor authentication where 1 factor should be a biometric.  10.3.2 already requires a biometric and/or a password. Removed the 'Or' condition.
NPIA/ 32	10.3.2 – Biometric and Password But also relevant in 9 - Transacti ons		te	User level authentication details should accompany the transaction – especially if searching multiple databases since not all users may be entitled to get the same (or indeed any) response to a hit on certain individuals held in particular databases.	This issue is not adequately addressed in the document at the moment	George White / Greg Cannon made contribution.  May still need more work.

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MOT 18	10.2.3		Те	If you encrypt the application, you will also need to decrypt the application to run it. This most likely will create a slow application.	Remove applications from the sentence.	Accept.
MOT 19	10.3.2		te	Are there specifications for the minimum lengths?	Define specifications.	Reject
MOT 20	10.3.3		Те	Are there specifications for the designated length of time?	Define specifications.	Reject
FBI 7	10.3.3		te	Section 10.3.3 and section 10.3.4 seem like the same thing to me.	Combine these two sections into one.	Reject.
MOT 21	10.3.4		te	Are there specifications for the designated amount of idle time?	Define specifications.	10.3.4 " device should reauthenticate after"  Now: both user & device authentication?
L1/10	10.3.4		Te	Mobile devices running many OS currently provide an idle time re-authentication capability that is built into the OS. It uses a PIN rather than a managed password or biometric log on.  It is acceptable for CJIS security requirements.	Reword 10.3.4 to state a dedicated idle time or device shutoff function may be provided requiring user re-authentication.	Withdrawn
MOT 22	10.3.6		te	Are there specifications for the maximum limit of failed authentication attempts?	Define specifications.	Reject.
MOT 23	10.3.8		te	Are wireless over-the-air updates of local databases required?	Define specifications.	Reject.
FBI/2 11	10.3.8	Para. 1	ed	First sentence, "need" should be "needed"		Accept.
Noblis /	10.3.9	1 <sup>st</sup> para	te	Is the reference to FIPS 201-2 correct?	Replace "FIPS 201-2" with "FIPS 140-2"	Accept

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23						
BPRA 15	Communi cation Protocols	Wireless Technologies	Te	Doesn't make a contribution in this context. Not under the control of any of us. No impact on the major point of this document, which is to sponsor, urge, and facilitate interoperability at the data exchange level.	Why in this document?	Withdraw
CMT/27	11.1	Figure 1	Ed	Figure 1 is too small for the detail	Enlarge Figure 1	Editor choice Figure has been redrawn
Noblis / 24	11.2	1 <sup>st</sup> para	te	Are data rates dependent on the image (or transaction?) size or the communication protocol employed?	Replace:  Minimum data rates are dependent on the image size to be transmitted and reasonable limits on time of detention.  with:  Acceptable minimum data rates are dependent on the transaction size to be transmitted, reasonable limits on time of detention, and the selected communication protocol.	Accept.
CMT/28	11.3.1		te	Document references Cingular, should state AT&T	State AT&T instead of Cingular	Delete reference to company.  Change. To:" and by some US carriers"  Change in 11.3.1 and .2
MOT 24	11.3.1		ed	Cingular is now AT&T.	Change to AT&T.	

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FBI 8	11.3.1	Figure 1	Те	Figure shows database on the capture device. The document talks about a database on the capture device and this implies that this is allowed as a best practice when this should really only be a last resort (if then) practice.	Remove database from capture device in the picture.	Show optional on figure. Rob Horton supplied supply updated drawing.
L1/11	12		te	These are not requirements; they are typical expectations.	Move these to an annex. Retitle to "Environmental Conditions".	See ITAL 7
ITAL/ 7	12		Те	This kind of mobile devices can be used in several different environments, such as an office environment (court), a homeland security context such as an airport terminal, a law enforcement environment (a patrol officer on the street) or even a military environment.	At least 3 different profiles regarding the environmental requirements should be defined (for example: office, law enforcement, military) with increasing requirements in terms of operating temperatures, resistance to shock, water spray, etc. Setting these requirements too high where they are not needed could increase the cost of the devices and limit their adoption.	Accept. Make environmental considerations  Marco De Palma supplied new Section 12
FBI/1 18	12.1	Paragraph 1	Те	Incorrect information.	50d C = 122d F	Accept.
CMT/29	12.4		te	Need IP level stated	Add IP65 for water spray and dust	Refer to Marco to add IP level and make special section. In title change naval to maritime.
Noblis / 25	12.4	1 <sup>st</sup> para	te	Cite more specific requirements or strike 12.4	Cite more specific requirements or strike 12.4	Add text aimed at consideration.
Noblis / 26	12.5	1 <sup>st</sup> para	te	Cite more specific requirements or strike 12.5	Cite more specific requirements or strike 12.5	Add text aimed at consideration.
CMT/30	12.5		te	Need to state spec or level of vibration and shock	Add specification or levl of shock and vibration needed.	Add text aimed at consideration.
CMT/31	12.6		te	Need to state height of drop,	Add Mil Spec 810 F- 516.5 26 drops (each edge	Add text aimed at

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					and face of device) from 4 ft. onto concrete.	consideration.
MOT 25	12.6		Те	Has the "XX" meters been defined?	Define specifications.	Add text aimed at consideration.
FBI/1 3	12.6	Paragraph 1	ed	Incorrect punctuation.	Remove second period at end of paragraph.	Accept
Noblis /27	13		te	Clause 13 offers no concrete guidelines for the use of XML.	Offer concrete guidelines for the use of XML or strike Clause 13	Reject.  Readdress after July 14 <sup>th</sup> .  Text has been added on new ANSI/NIST XML
CMT/32	13		te	Intermixing NEIM for NIEM	Should state NIEM	Accept
Noblis / 28	13	2 <sup>nd</sup> para 2x	ed	Replace NEIM with NIEM	Replace NEIM with NIEM	Accept
MOT 26	13		Ed	"NEIM" should be "NIEM."	Change to "NIEM".	Accept
FBI/1 19	13	Paragraph 2	ed	Incorrect acronym.	Change all instances of NEIM to NIEM.	Accept
NPIA/ 33	13 - XML		te	The use of XML has implications for data transmission size.  The use of XML may not be appropriate for mobile applications where bandwidth is limited.		Insert text in doc as a head- ups.
Noblis / 29	13	2 <sup>nd</sup> para	ed	Expand 1 <sup>st</sup> use of acronym SIB	Expand 1 <sup>st</sup> use of acronym SIB	Accept. Eliminated acronym
L1/12	Annex A		te	Question was raised as to the purpose of this annex.	Consider removing from document.	Reject
FBI/1 20	A.2	A.2.2	Ed	This paragraph is specific to fingerprints, yet the Mobile	Remove references to "fingers" and "prints" and	Accept.

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				ID document is multi-modal in nature.	replace them with the generic term "images".	
MOT 28	Annex A 3.2.5	4	te	Currently, finding the core location is difficult when using small sensors.	Re-define statement.	Reject
MOT 29	Annex A 3.2.9		te	In the 12 <sup>th</sup> bullet, to ensure that sequence errors do not occur, you must have Roll-to-Slaps (RTS) to do this properly.	Re-define statement.	Delete 2 <sup>nd</sup> sentence of 12 <sup>th</sup> bullet.
NPIA/ 34	A.3.3.3 – Return Data Display		te	This assumes that mobile face recognition units are always used in conjunction with a PC and return a line-up of possible matches.  What about totally mobile handheld devices? Is there a minimum acceptable display size for viewing images?	Give examples of information which may be returned and display requirements for each scenario.	Geoff made a contribution which has been incororated into the BPR
NPIA/	A.3.4.1 -		te	Why is this limited to the transmission of templates?	Include transmission of iris images.	IRIS SAG
35	Template					Added this change without sag review
CMT/ 33	A.3.4		Те	Need additional notes for Iris capture	Use of sunshields or hoods can facilitate outdoor capture and reduce the need for high-power illumination sources.  Devices without mechanical alignment require high frame rates, auto-focus, large capture volumes, and auto-capture. Such devices do not require physical contact with the subject.  Devices with mechanical alignment have simpler imaging and illumination requirements but do require physical contact with the subject.  Display of captured images is helpful in that it provides direct feedback to the operator in the case that iris image quality is not adequate.	Added these notes without sag review

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FBI 9	A.5		te	Section does not include an idle time power down/off feature discussed in section 5.	Include an idle time power down recommendation time.	Reject
CMT/34	A.5.1		ge	Sentence not clear	State "hot swap" of battery	Accept. Clarify
MOT 27	Annex A A.5.1		Те	What is the required defined length of continuous operation without charging?	Define desired length of time.	Reject
CMT/35	A.5.2		te	Charging specification needs to accommodate Military vehicles as Humvee.	Several Military vehicles use 24 V electrical systems; charge voltage should be increased to accommodate this value.	Make generic and add power filtering and surge protection.
CMT/36	A.6		te	No indication of salt spray certification for navel use.  Does IP 67 include salt spray?		Reject
MOT 30	Annex B39	Paragraph 2	Те	How large of a database is being searched for the 5 minute response time? Is the response time measured from the time of submission to the time a hit/no-hit response is received at the handheld device, including network transmission?	Define database size and response time measurement.	Delete last sentence under network
FBI/2 12	В	Para. 3	ed	Missing word after "resident"?		Accept. Add database
MOT 31	39	Paragraph 4	ed	Responses paragraph - "Possible" should be "possible"	Change to "possible."	Accept
MOT 32	39	Paragraph 6	Те	Reporting paragraph - Is any specific content requested to be included in the reports?	Define report requirements.	Reject
CMT/37		Glossary	Ge	If we define acronyms such as FBI and DHS, I would define the following acronyms used in the spec doc.	List all abbreviations/acronyms with their meaning in the Glossary.	Accept

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# Title: Comments on: MobileID-BPRS-20080505.pdf Contact: Michael McCabe rmmccabe@Comcast.net

Date: June 5, 2008 Document: Approved Resolution of Comments

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EDI 10				AFIS, FIPS, NIST, NFIQ, BAP, SAP.		
FBI 10	Glossary		Ed		Include other terms such as EBTS, BAP, SAP, PIV, NFIQ, FIPS, NEIM	Accept

FBI Federal Bureau of Investigation

MOT Motorola
ITAL ITALDATA
BPRA Bill Long
NOBLIS NOBLIS

NPIA UK National Police Information Administration

TXDPS TX Department of Public Safety

CMT Crossmatch LM Lockheed Martin

L1 L1

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# Title: Comments on: MobileID-BPRS-20080505.pdf Contact: Michael McCabe rmmccabe@Comcast.net

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