Title: Comments on: MobileID Device BPR - 20080916		Date: October 28, 2008	Document: Approved Proposed Resolution of Comments

1	2	(3)	4	5	(6)	(7)
MB[1]/ # (e.g. FBI/1)	Clause No./ Subclause No./ Annex	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com-ment[2]	Comment (justification for change) by the MB	Proposed change by the MB	Proposed Editors Disposition LEAVE THIS COLUMN BLANK
DHS/T SA01	General	All	Ed	For clarity, precise use of the terms "Mobile ID" and "mobile identification" should be maintained throughout the document.	The proposed changes by DHS/TSA abide by the following usage: "Mobile ID" is a DEVICE term "mobile identification" is a more general term, such as a qualifier "mobile identification data" or a verb form. It should not have unnecessary capitalization.	Accept
DHS/T SA02	General	All	Ed	For clarity, precise use of the terms "function" and "task" should be maintained throughout the document.	The proposed changes by DHS/TSA abide by the following usage: FUNCTIONS are (1) Enrollment, (2) Identification or (3) Verification. TASKS are (1) Data Capture, (2) Signal Processing, (3) Matching or (4) Decision	TBD- Vocab Ad Hoc Peter Higgins, Rick Lazarick, Peter Komarinski,, Shahram Orandi, Mike McCabe
DHS/T SA03	General	All	Ed	The terms used for "personnel" vary throughout the document and should be used precisely.	The proposed changes by DHS/TSA adopt the following usage: SUBJECT – the person whose biometric data is being acquired by the Mobile ID device OPERATOR – the person operating the Mobile ID device, such as a law officer, government agent USER – a person (or organization) that utilizes the output of the Mobile ID device is their application	Vocab Ad Hoc Coordinate with NIST IR 7378.
FBI –C 3	ge		ge	Numerous reference to standards throughout the document that need defined	Add reference descriptions to Glossary and rename Glossary appropriately	Accept. Diane Casteel contribution

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					(Acronym/Glossary List)	Add a reference section.
FBI-C 4	ge		ge	Identified numerous acronyms in document not included in Glossary.	Check all acronyms in document and verify they are included in Glossary.	Accept. Suggestions Appreciated Diane Casteel Contribution.
FBI-C 6	ge		ge	There are numerous "Shall" statements throughout the document. This is a Best Practice and Recommendation document not a requirement document.	Reword to represent recommendations not requirements	Accept. Diane & Mike will accept where appropriate but certain parameters are required and *shall not* be changed to 'should' such as resolution.
ITAL/ 1	1		ge	Today, many Identity Documents (e-Passport, Residence Permit, Driver License) include some form of biometric feature (fingerprint, facial image). Mobile ID devices can also be used for the verification of the new biometric documents, by comparing a live fingerprint with the fingerprint stored in the document chip. In the current draft of the BPR document, this specific application is not sufficiently highlighted.	Add the following at the end of page 6: "Another application of Mobile ID devices is related to the new electronic Identity Documents that contain, in a contact or contactless chip, one or more biometric samples (fingerprint, facial image). Examples of these documents include the new ICAO compliant Electronic Passport and the Electronic Residence Permit that is being developed in some countries. By using a Mobile ID device, a fast identity verification can be performed by comparing the live fingerprint of the document owner with the fingerprint stored in the document chip, and, if needed, the captured biometric sample can	Accept Add the following at the end of page 6: "Another application of Mobile ID devices is related to the new electronic Identity Documents that contain, in a contact or contactless chip, one or more biometric samples (fingerprint, facial image). By using a Mobile ID device, a fast identity

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					be sent to a central system for further checks."	verification can be performed by comparing the live fingerprint of the document owner with the fingerprint stored in the document chip, and, if needed, the captured biometric sample can be sent to a central system for further checks."
FBI-C 1	1	Pg.7 par. 2	ed	Known and Suspected Terrorists s/b Known or Suspected Terrorists	Change and to or.	Accept
FBI-V 1	1 Page 7	Para 3	ed	Extra space after "and" in sentenance that begins "Since there are,"		Accept.
FBI-V 2	1 Page 8	Line 6	ed	Extra space after the word "protocols" and before the period.		Accept.
DHS/T SA05	1	Para 3 sentence 4	ed	Use of the term "biometric"	Change "once the biometric is..." To "once the biometric **sample** is ..."	Accept.
DHS/T SA06	1	Para 3 sentence 7	ed	PIV is broader that just DHS	Change "and the PIV program" To "and **across all Departments**, the PIV program..."	Accept.
DHS/T SA07	1	Para 3 sentence 7	ed	Grammar	Change "In DHS" To "In **the** DHS"	Accept.
IDTP	1	Par 3 line4	Ed	"In the DoD world they are used, by the		Eliminate phrase "by the

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1				thousands.." Is this an exaggeration?		thousands"
DHS/T SA08	1	Para 4 sentence 3-4	ed	List contains a mix of nouns and verb phrases	Change "In the case of fingerprints, this may be the result of different scanning resolutions, use of image versus template, differing image sizes, or different fingers. Such a variety of options can result in a general lack of interoperability between systems." To "In the case of fingerprints, this may be the result of different scanning resolutions, ~~use of~~ image versus template, **different** image sizes, or different fingers. Such a variety of **characteristics** can result in a general lack of interoperability between systems.	Accept.
DHS/T SA09	1	Para 5 sentence 1	ed	Loosely used terminology	Change " neighboring" To "**other (non-agency)**"	Accept. Replace neighboring to other
DHS/T SA10	1	Para 7 sentences 3 through 6	te	Detail level of this material is not suitable for the "Introduction" (*see related comment on Section 3 paragraph 3*)	Move this material to section 3 "Purpose" as part of paragraph 3 (or other location the editor/committee determine)	Accept. See DHS/TSA 018
DHS/T SA11	1	Para 7 last 2 sentences	ed	Paragraph structure and flow	Make the last two sentences into a new final paragraph	Accept.
DHS/T SA12	2	Para 1 sentence 1	ed	The term "reliability" may be interpreted differently than intended in this context (unless electro-mechanical reliability like availability, MTBF, etc. are	Change " and reliability " To " and **identity** reliability "	Accept.

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				intended).		
DHS/T SA13	2	Para 2 sentence 2	ed	List is mostly in adjective form, except the word "capture" – check the recommended correction – "efficiency" may not be the best adjective form?	Change " capture " To " capture **efficiency** "	Reject. Remove accuracy from sentence.
DHS/T SA14	2	Para 3 sentence 1	te	The concept of a BAP is being defined here and this sentence can be misleading. The series of SAPs is NOT within each BAP, but within each modality.	Change "Within each BAP for a particular modality, a series of Subject Acquisition Profiles (SAP) shall identify progressively more stringent sets of parameters " To "Within each ~~BAP for a~~ particular modality, a series of Subject Acquisition Profiles (SAP) shall identify progressively more stringent sets of parameters "	Accept.
NPIA/ 32	Scope		Te	It would be helpful to give some background to the SAP levels. A simple reference to where these come from ANSI ….). At the moment these appear to be arbitrary figures.	Insert Reference to source of SAP scores.	Accept. Define the concepts of the SAP within the BPR.
NPIA/ 1	3	PURPOSE – 1ST para, 3rd sentence	ed	Tense is inconsistent with previous sentences	Reword as 'It has been developed for Govt applications and is intended to be ….'	Accept.
DHS/T SA15	3	Para 1 sentence1	ed	Incorrect plural	Change " Section**s** 11 " To " Section 11 "	Accept.
DHS/T SA16	3	Para 1 sentence 2	ed	Usage of "mobile identification"	Change " mobile identification "	Accept.

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					To " Mobile ID "	
DHS/T SA17	3	Para 2 sentence 2	ed	Word choice	Change " including " To " such as "	Accept
DHS/T SA18	3	Para 3 (entire)	te	The order and content of this section should be adjusted. Also, from comment on Introduction, paragraph 7, include that text here as shown in proposed text.	Replace para 3 with: This document is intended to assist the FBI, law enforcement agencies, DoD, DHS, and other organizations that process and exchange fingerprint, facial, and iris data biometric data captured and acquired from a Mobile ID device. Information **captured.** compiled and formatted in accordance with this BPR and the EBTS 8.002 implementation of the ANSI/NIST-ITL 1-2007 standard can be transmitted and seamlessly exchanged with the FBI and other compliant organizations without regard to any peculiarities of the capture device.2 ~~Information can be gathered directly from a fingerprint scanner, facial image camera, or iris camera.~~ For those systems requiring connectivity with the FBI's IAFIS or NGI, these profiles will rely on the FBI's EBTS 8.002 and the ANSI/NIST-ITL 1-2007 [hereinafter ANSI/NIST] standard that specify records with field requirements based on existing systems. For those modalities that do not have a defined ANSI/NIST record type, data blocks data encoded according to INCITS/ISO format standards shall be embedded in the ANSI/NIST Type-99 record. When sending transactions to the FBI, DoD	Accept. Change the nature of specific versions to current versions. See DHS/TSA 010 This document is intended to assist those organizations that process and exchange fingerprint, facial, and iris data biometric data captured and acquired from a Mobile ID device. Information captured**,** compiled and formatted in accordance with this BPR and compliant with the target system implementation of the ANSI/NIST standard can be transmitted and seamlessly exchanged.

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					systems will have to be compatible with the FBI EBTS to the appropriate level. But, as not all DoD biometric encounters are intended to be searched broadly (such as check point encounters that are only run against locally stored/networked watch lists), those transactions will only be required to adhere to their DoD protocols .	
DHS/T SA19	3	Para 3 footnote 2	te	The reference to the BFC should be updated	Change " Biometric Fusion Center (BFC) " To " Biometrics Task Force (BTF)"	Accept.
FBI-C 2		Footnote #2, Page 9	ed	BFC may have changed name to Biometric Task Force?		Accept.
DHS/T SA20	4	Para 1 list item 3	ed	The term "registration" should be reconsidered	Change " registration " To " enrollment (or collection) "	Reject. Purpose may be only to link the biometric with a citation –not an enrollment.
DHS/T SA21	4	Para 1 list item 5	ed	Grammatical structure – list items are "applications"	Change " Need for verification of identity " To " Verification of the identity "	Accept.
DHS/T SA22	4	Para 1 list item 6	ed	Terminology related to personnel	Change " 3rd party users (subjects) " To " subjects "	Accept. Change to "subjects seeking access" Also refer to DHS 03.
DHS/T SA23	4	Para 1 list item 6	ed	Terminology related to personnel	Change " user of the mobile device " To " **operator** of the mobile device "	Accept. Also refer to DHS 03.

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DHS/T SA24	4	Para 2 sentence 1	ed	abbreviation	Change " Department of Defense" To " DoD "	Accept.
DHS/T SA25	4	Para 3 sentence 2	te	Reference to iris technology is biased	Change "Although iris comparison has not been identified as a current capability, this technology is being developed by vendors and is under consideration at some agencies. " To "Although iris comparison has not been identified as a current **application**, this technology **has been** developed by vendors and is under consideration at some agencies. "	Accept. See next comment: NPIA/2
NPIA/ 2	4	APPLICABILITY – final para	te	Iris comparison may not be a current capability in law enforcement but this BPR also addresses military requirements where iris *is* currently used	Reword as 'Although iris comparison has not been identified as a current capability for law enforcement applications, this technology is under consideration at some agencies and mobile enrolment of irises is already standard practice in many military scenarios.'	Accept. Reword as: 'Although iris comparison has not been identified as a current **application** for law enforcement applications, this technology is under consideration at some agencies and mobile enrollment of irises is already standard practice in many military scenarios.'
DHS/T SA26	5.1	Para 2 list item 1	ed	Capture may involve more than one sample	Change " sample "	Accept. Reword as: "..acquiring

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					To " sample or samples "	one or more raw biometric samples.."
DHS/T SA27	5.1	Para 2 list item 3	te	The term template is too restrictive	Change "reference templates in a database and generating a resulting similarity score for each template comparison. " To "reference templates **(or models)** in a database and generating a resulting similarity score for each ~~template~~ comparison. "	Reject.
DHS/T SA28	5.1	Para 2 list item 4	te	This decision description is too narrow	Insert at the end of the sentence " or more complex decision processing such as multibiometric fusion or candidate lists."	Accept
DHS/T SA29	5.1	Para 3 second bullet	ed	The "Operator Decision" bullet, first sentence is incomplete	Merge the first and second sentence into one sentence	Accept.
DHS/T SA30	5.1	Figure 1	te	The figure title is not descriptive of the figure content (note the new title uses terminology from the introductory text in para 1 of section 5) Also, these are TASKS not FUNCTIONS.	Change " Functions Over Networks " To " **Tasks Across 4 Basic Scenarios** "	See comment DHS 2 that defers to Vocab Ad hoc..
DHS/T SA31	5.1	First Para after Figure 1	ed	The term "these" does not refer directly back to the list of tasks a full page earlier.	Change " These tasks " To " The 4 primary tasks "	Partial Accept. Change to: "These primary tasks of image capture, image processing,matching, and generating an output decision .."
DHS/T	5.1	First Para	ed	Clarify terminology	Change " workload sharing "	Defer to DHS 2 Vocab Ad

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SA32		after Figure 1. Last sentence			To " task allocation "	Hoc
DHS/T SA33	5.1	Third Para after Figure 1	ed	This paragraph has no purpose	Delete paragraph including list	Accept Define the concepts of the SAP within the BPR. Refer to NPIA 32.
Sagem/ 1	5.1	Page 11, last paragraph	ed	Missing period after sentence.	Add a period after the sentence that starts with "**Note**: An application…"	Accept.
NPIA/ 3	5.2	Last but one bullet	ed	'….the biometric sensor is connected via a standard interface' Connected to what?	Reword as something like '…connected to a PDA, laptop or similar processing unit via a standard interface/	Accept Change the two bullets to "A biometric sensor can either be a peripheral (wired or wireless) device or integrated into a mobile ID device."
DHS/T SA34	5.2	Para 3 list item 2	ed	The term OEM seems to not fit this context	Change " An OEM device " To " An integrated device "	Reject -overcome by events (see NPIA/3).
DHS/T SA35	5.2	Para 4 sentence 1	ed	The figure 2 deals with Physical architecture, not network	Change " network " To " physical "	Accept.
IDTP 2	5.2	Para 4 Fig 2	te	Is the term "radio" being used properly?	Remove the 'radio' idea.	Accept. . Change Radio box to Communication Device &

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						<mark>also in the text.</mark>
DHS/T SA36	5.2	Fig 2	Te	The purpose of the figure is to illustrate the difference between a 1-box integrated architecture versus a 3-box "component" architecture. The confusion relates to the task being performed by the "Processor" IF the task is the "Signal Processing" task, then this does not agree with the left side of the figure which shows the cloud before "signal processing" – if so, move the cloud in front of "matching" on the left side.	move the cloud to a location in front of "matching" on the left side of the diagram	<mark>Delete Figure 2 .</mark> <mark>Defer to TJ for rewording</mark> of the fourth paragraph. Also Change: **Error! Reference source not found.** shows a parti-cular network architecture, implemented either as a radio (a single box) with embedded biometric functionality or as a set of three interconnected per-ipherals, each with its own function. To: A mobile ID device can be implemented either as a radio (a single box) with the communications em-bedded in the device or as a peripheral or as a set of interconnected peripher-als, each with its own function.
DHS/T	5.2	Figure 2	ed	Labels could be more precise	Change " One Architecture "	<mark>Refer to above. DHS/36.</mark>

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SA37					To " One Functional Architecture "
					
					   AND
					
					Change " Two Implementations "
					
					To " Two Physical Implementations "
					
					   AND
					
					Delete "OEM" from 1-box illustration	

ITAL/ 2	5.2		Te	The use of non integrated devices, where the biometric capture device, processing unit, communication hardware, etc. are not integrated in a single device could be unpractical (think about all the cables that will be required to power and interconnect the devices) or pose security issues (if wireless connection between the individual devices is used). Allowing non integrated devices in the procurement of Mobile ID devices will open the doors to improvised solutions that, even if they satisfy the technical requirements, could prove to be unusable in the real use conditions. Thus, the BPR document should recommend the use of integrated devices.	At the end of 5.2, add the following "Preference should be given to integrated devices, since the use of two or more different devices (such as biometric capture device, processing unit and radio) could be unpractical (if wired connections are used) or pose security issues (if wireless connections are used). This is especially true for handheld devices. For devices installed in cars, it is acceptable to have a fixed installation of the processing unit and radio device, while the biometric capture device is connected (using a wired or wireless media) to the processing unit to allow its use outside the car."	==Rejected==
DHS/T SA38	5.3	Para 1 list item 7	ed	Security term used twice - redundant	Change " transmission security " To " transmission "	==Accept.==

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DHS/T SA39	6	Title	ed	The titles for section 6, 7 and 8 should all be aligned. Recommend the style: "Mobile ID *(specific modality)* Capture Devices"	Change " Mobile ID Fingerprint Devices " To "Mobile ID Fingerprint **Capture** Devices "	Accept.
DHS/T SA40	6.1	Para 1 sentence 4	ed	The table has 3 categories, not just the two cited here	Change " capture and interchange categories " To "capture, interchange and **security** categories "	Accept.
DHS/T SA41	6.1	Para 1 sentence 5	ed	The rearrange the sentence structure to avoid the singular form of "image"	Change "The enrollment function should be concerned with acquiring a very high quality image. " To "The enrollment function should be concerned with acquiring very **high image quality**. "	Accept. Change to: The enrollment function should be concerned with acquiring **one or more** very high quality image(s).
DHS/T SA42	6.1	Para 1 sentence 6	ed	Reference to 378 format is inappropriate – any fingerprint capture used for enrollment (378 or not) should be subject to the same quality criteria.	Change "4 or 5 *using M1 378 format* should not... " To " 4 or 5 should not... "	Accept
NPIA/ 4	6.1	Overview – 1st para - last but one sentence	ed	'For that reason, image captures with an ….'	Would read better as 'For that reason, images captured with an…'	Accept.
NPIA/ 5	6.1	Overview – 1st para – 3rd	te	Replace stored in the database with just "stored" as it might not be always stored in a database could be on card or locally.	Reword to "Unacceptable matcher performance due to poor quality enrolment images stored".	Accept.

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		sentence				
L11	6.1		Ge	The desire is not to notify the user if image quality is less than NFIQ 3. It is to notify the user if image quality is not better than NFIQ 3. Vendor algorithms that ensure NFIQ level 2 should be acceptable.	Change from: For completely self-contained mobile devices, the image quality must be performed on the mobile device. For fingerprint capture, the mobile device must be able to measure the fingerprint image quality with the NFIQ algorithm. The mobile device must alert the user if a poor fingerprint image was captured (worse than NFIQ 3). To: For completely self-contained mobile devices, an image quality check must be performed on the mobile device. For fingerprint capture, the mobile device must be able to measure the fingerprint image quality to ensure NFIQ level 3 is met or exceeded. The mobile device must alert the user if a poor fingerprint image was captured not meeting or exceeding NFIQ level 3.	Accept Replaced with: The best practice recom-mendation is that an initial image quality assessment must be done to provide feedback to the operator during the capture pro-cess. In most cases, this function is best located on the device, although further quality assessment may also take place else-where in the system. The system shall use the NFIQ algorithm and must alert the user if a poor finger-print image was captured (NFIQ level 4 or 5.) Note: delete paragraph beginning with "depending".
Sagem/2	6.1	Table 1	Te	Table 1 should be expanded to have SAP Level 25 with Minimum Image Dimensions of .8 x .8. SAP Level 20 is close to the average plain	Propose SAP Level 25 with Minimum Image Dimensions (WxH) of .8 x .8 and SAP Level for Moderate Identification to 25+ (Section 6.5.5 / Table 3)	Reject

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				impression size. Capturing additional surface area for larger fingers will increase accuracy (e.g., thumbs). In addition ,SAP level for Moderate Identification in Table 3 (Section 6.5.5) should also be modified to 25+		
FBI-V 3	Table 1	Sim # of Fingers – 50	ed	Missing space between to and 3		Accept
FBI-V 4	Table 1	Sensor Cert. - 50	ed	Extra period after "F"		Accept
DHS/T SA43	6.1	Table 1	Te	All SAP levels included in this document adhere to the overall principle that higher SAP levels are more stringent requirements leading to higher accuracy. One exception occurs in this table. The "Max Compression Ratio" row, for SAP 30 moving to SAP 40 changes from 10:1 to 15:1. This is in the "less stringent" or "less accuracy" direction. It is recognized that this compression is probably appropriate given the image area increase from 30-40, but it none-the-less deviates from the overall principle, and should be so noted.	Insert a note, marked in the cell for SAP40 and Maximum Compression Ratio. NOTE 2: The progression from SAP 30 to SAP 40 in the maximum allowable compression ratio could be viewed as a decrease in requirement stringency, but is justified because of the 3-fold increase in minimum image area.	Accept Add as note[2] in table 1 to reference 6.2 Add to 6.2.4: The progression from SAP 30 to SAP 40 in the maximum allowable compression ratio is not to be viewed as a decrease in requirement stringency.
DHS/T SA44	6.1	Table 1 column	ed	The use of asterisks on 40 and 45 is related to the NOTE following the table. It really only deals with	Remove the asterisks from the headings. Insert a note marker (1) in the cells "Minimum	Accept

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		headings		the "Minimum Resolution" row of the table.	Resolution" for SAP 40 and 45. Change the NOTE to "NOTE 1" (based on comment above if accepted inserts Note 2).	Explain difference between levels 40 and 45
FBI-H 1	6.1	Table 1		Fingerprint sensor 60 has the W & H reversed - it should be 3.2 wide by 3.0 height	Fix it	Accept
DHS/T SA45	6.1	Table 1	Ed	The security item "Secrecy Supported" is not clear as to its intent, and is not aligned with the title of 6.4.1	Change " Secrecy Supported" To " **Data** Secrecy Supported "	Removed security section from table. See document comments (migrate from section 6.4 to 10.x)
DHS/T SA46	6.1	Table 1	Ed	The security item "Authentication Supported" is not clear as to its intent, and is not aligned with the title of 6.4.2	Change " Authentication Supported" To " **Data** Authentication Supported "	Removed security section from table.
NPIA/ 6	Table 1	Security	ed	What do these last two rows really mean? Secrecy supported - what is 'secrecy'? Authentication supported – authentication of what?	Add explanation of what these rows mean	No longer applicable. Refer to DHS 45 & 46
DHS/T SA47	6.1	First Para after Table 1 NOTE sentence 1	te	The "BAP level" term seems inconsistent – should it be "SAP levels"?	Change " BAP " To : "SAP"	Accept
DHS/T SA48	6.1	Last Para last sentence	ed	The term "user" may be incorrect here. If the information is to be used immediately to make an additional capture attempt, then the person to be	Change "user" To "operator"	Accept Refer to DHS 03

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				informed is the "operator"		
DHS/TSA49	6.1	Last Para (entire)	ed	This material is all image quality related. Consider moving it to 6.1.2 at the end	Move entire paragraph to 6.1.2 at the end	Noted. See NPIA/7
NPIA/7	6.1	Last para	te	A key benefit of image quality assessment is to provide feedback to the operator. It is therefore always best practice to have this function **on the device**, even if a more rigorous quality assessment is also done elsewhere in the system	Insert after 1st sentence – 'However the best practice recommendation is that an initial image quality assessment must be done to provide feedback to the operator during the capture process. In most cases, this function is best located on the device, although further quality assessment may also take place elsewhere in the system.'	See L1-1 on page 12.
DHS/TSA50	6.1.1	Para 1 sentence 2	te	Wording does not include the function of verification	Change " interoperability and identification accuracy " To "interoperability and **verification or** identification accuracy "	Accept.
NPIA/8	6.1.2	1st line	ed	Change 'effects' to 'affects'		Accept.
Sagem/3	6.1.2	First sentence	ed	Use of effects versus affects. The word 'affects' is more appropriate to use versus effects which signifies "to cause to come into being" [Merriam-Webster]	The quality of the captured image **affects** the extracted feature accuracy.	Accept.
DHS/TSA51	6.1.2	Para 1 list item 1, sentence 2	te	The blanket statement "Minutiae do not provide interoperability" needs to be qualified. SAP 5 is not an image interchange, and PIV is by definition interoperable, making this statement false.	Insert "Other than in the case of SAP 5," at the beginning of list item 1 OR	Noted Strike 6.1.2. Info is repeated in section 6.3.1

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					Editor/committee agreement on another remedy.	Insert following sentence after 1st paragraph of 6.1.1: For improved interoperability across dissimilar AFISs the mobile device needs to capture, compress and transmit the fingerprint images.
DHS/T SA52	6.1.2	Para 1 last list item	te	The third list item is not an image quality and feature accuracy topic, so does not belong here.	Delete the final list item (Editor may consider inserting elsewhere, no recommendation as to where.)	See DHS51
NPIA/ 9	6.1.2	1st bullet	ed	Poor wording Also – and more importantly - this section overlaps considerably with 6.3.1 – Image v Template. Do we really need both of these sections?	Suggest something like 'To support interoperability, best practice is for the mobile device to capture, compress and transmit the finger images, rather than the extracted minutiae. Even the use of MINEX certified extraction algorithms will not deliver the same degree of accuracy (for interoperable systems) as can be obtained through the use of image data. In addition, accurate feature extraction is CPU intensive, especially with poor quality images, and is best done remote from the mobile device.	See DHS51
NPIA/ 10	6.1.2	2nd bullet	ed	Change 'can be compressed' to 'should be compressed' – it is a recommendation.	Change to "should be"	See DHS51

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NPIA/ 11	6.1.2	3rd bullet	te	This has nothing to do with image quality and feature accuracy – it should be in 6.3 – 'Interchange requirements.' Or incorporated into 6.3.2 – Standard Used.	Delete bullet 3 or move to relevant section.	See DHS51
ITAL/ 3	6.1.3		Te	It is said that "four fingers should be considered as an operational minimum". It is not clear if this relates to the enrollment phase or to the verify-cation/identification phases and this is not in line with Table 3, par. 6.5.5 where, in some use cases, two fingers are acceptable. The guideline for the number of fingers to use should be left in Table 3 only.	Delete the first sentence in the bulleted list.	Reject. See NPIA 13 below.
NPIA/ 13	6.1.3	1st bullet	te	The number of fingers to be used is application dependent (see Use Cases – table 3). It depends on the size of database being searched, the mode (identification / verification) and how the results are to be interpreted. What about enrolment – are 4 fingers really a acceptable as a minimum?	Reword something like – 'The number of fingers to be used depends on the Use case (see Table 3). However tests have shown that using 4 fingers rather than 2 results in a order of magnitude reduction in errors' Note – is 'error' really the best word to use here – what sort of errors are we talking about?	Accept with rewording below. The number of fingers to be used depends on the Use case (see Table 3). However tests have shown that using 4 fingers rather than 2 results in a significant improvement in accuracy. See ITAL/3
IDTP 3	6.1.3	After 3rd bullet	Te	Unless common finger numbers are recommended, interoperability will never be achieved.	Suggest a 4th bullet stating that the recommended fingers to be captured are finger numbers 2,3,7, and 8	Partial Accept

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						Best practices recommendations would be that mobile devices are configurable so that they can capture the specified fingers for a particular application. When fewer than 10 fingerprints are being captured for interoperability across dissimilar systems it is recommended that fingers 2,3, 7 & 8 be used. A minimum specification calls for the use of two index fingers. The above bullets should be merged with 6.1.3. & cleaned up.
DHS/T SA53	6.1.3	Para 1 sentence1	ed	Clarify the term "accuracy"	Change " effects the accuracy " To " effects the overall **system decision** accuracy "	Partial accept. Change to: Affects the overall system accuracy.

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DHS/T SA54	6.1.3	Para 1 list item 1	te	The scope of this statement should be limited to "identification"	Change " operational minimum " To " operational **minimum for identification applications** "	Reject
DHS/T SA55	6.1.3	Para 1 list item 2	ed	Punctuation – add hyphen and period	Change " middle index " To " middle-index " AND insert period at the end after "thumbs"	Accept.
FBI-V 6	Page 17	Second Bullet of 6.1.3	ed	Missing period at end of last sentence		Accept.
FBI-V 5	Page 17	Last bullet of 6.1.3	ed	Sentence does not make sense		Accept Change wording to: "Images that **are** not large enough to.."
DHS/T SA56	6.1.3	Para 1 list item 3	ed	Grammar	Change " that do not large " To " that **are** not large "	Accept. See FBI-V 5
L1 2	6.1.3	Bullet 3	Te	Need to correct verbiage. "Images that do not large enough to contain the complete finger print may reduce the accuracy. "		Accept. See FBI-V 5
NPIA/ 14	6.1.3	Final bullet	ed	Grammar - Images that do not large enough	Reword – The use of image sensors that are not large enough to capture the complete fingerprint may lead to a reduction in accuracy	Accept. See FBI-V 5

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NPIA/ 12	6.1.3	1st line	ed	Change 'effects' to 'affects'		Accept.
Sagem/ 4	6.1.3	First sentence	ed	Use of effects versus affects. The word 'affects' is more appropriate to use versus effects which signifies "to cause to come into being" [Merriam-Webster]	'The number of fingers used and the amount of data captured for each finger significantly **affects** the accuracy.'	Accept.
FBI-C 5	6.1.3 and 6.1.4	Pg. 17	Ed	Are the statements included in sections opinions or facts?	If facts, quote where the facts were derived and include in reference section. Such as, FpVTE reference.	Noted Remove the reference to FpVTe as it is becoming out-of-date. In the FpVTE testing the top vendors got ten times as many errors with two fingers as compared to four fingers. Info in 6.1.4 is from experience.
ITAL/ 4	6.1.4		ed	Fingers captured one at a time may have or may not have sequence errors.	Replace the first part of the sentence with "Fingers captured one at a time may have sequence errors".	Accept See DHS 57 below.
DHS/T SA57	6.1.4	Para 1 list item 1	te	Frequency of sequence errors is overstated	Change "Fingers captured one at a time have sequence errors. Fingers captured in a stressful environment have more sequence errors. " To "Fingers captured one at a time **are more prone to** have sequence errors. Fingers	Accept With changed wording: Fingers captured one at a time have a tendency for sequence errors. Systems with high accuracy

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					captured in a stressful environment **may** have more sequence errors. "	requirements will need to search the captured fingers in multiple combinations.
DHS/T SA58	6.1.4	Para 1 list item 2	ed	This seems too editorial	Delete list item OR Convert to an NOTE	Partial acceptance. Removed 2nd bullet. Combine the first and second items.
FBI-V 33	Page 17	6.2	ed	Extra space between "5 ppi " and the period		Accept
ITAL/ 5	6.2.1		ed	The acceptable error on the resolution is +/- 5 or +/- 10 ppi depending on the sensor certification.	Change 6.2.1: "The minimum acceptable resolution is 500 ppi +/- 5 or +/- 10 ppi, depending on the sensor certification, as stated in Table 1."	See DHS 59 below Remove 6.2.1 because it is in the table.
DHS/T SA59	6.2.1	Para 1 sentence1	Te	Disagrees with the table 1 values	Change " 500 ppi +/- 5 ppi " To " 500 ppi " OR Reconstruct this paragraph to clearly align with the table values	Accept See ITAL 5 above

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DHS/T SA60	6.2.2	Title	ed	The titles in 6.2.x should be precisely aligned with the row headings in Table 1	Change " Minimum Image Size" To " Minimum Image **Dimensions (WxH**) "	Accept
FBI-V 7	Page 18	6.2.3	ed	Missing space between "algorithm,will" and extra period after last sentence		Accept
DHS/T SA61	6.2.3	Para 1 last sentence	ed	Redundant periods..	Delete one period after WSQ	Accept
Sagem/ 5	6.2.3	First paragraph	ed	Remove double period at the end of the last sentence.	Remove double period at the end of the last sentence.	Accept
DHS/T SA62	6.2.5	all	Te	This states "should" but the table 1 has this as a requirement?	Change " should " To " shall " – 2 instances	Accept
NPIA/ 15	6.2.5	Sensor Certification	ed	No reference to appendix F in doc	Consider adding a link to the FBI's website?	Accept, adding link appendix F in reference section. In 6.2.5 be consistent in referring to appendix F.
DHS/T SA63	6.2.6	Para 1 sentence	ed	Term used for minutiae – "detected from an image"? (see same issue in 6.3.1 paragraph 4)	Change " detected from " To " extracted from "	Accept
DHS/T SA64	6.3.1 and 6.3.2	varied	ed	This text almost always used "SAP level nn" not "SAP nn". Note two occurrences to be changed	Change " SAP 5 " To " SAP **level** 5 "	Accept

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DHS/TSA65	6.3.2	Para 1 sentence 1	ed	Terminology clarification	Change " data format standard " To " data **interchange** format standard"	Accept
FBI-J 1	6.4.1		Ed	Recommend deleting this section or simply referring to section 10. These requirements are not specific to fingerprints, but rather are a part of an overall security strategy as outlined in section 10.		Accept.
FBI-J 2	6.4.1		te	Suggest we reference specific sections of NIST FIPS 140-2 instead of a specific algorithm for maintainability of this document.		Refer to FBI-J 1
DHS/TSA66	6.4.2	Para 1 sentence 1	ed	Abbreviation DSS used here only and not defined	Spell out DSS	Accept This section moved to 10.2.10 but DSS still needs definition.
ITAL/ 6	6.4.3		te	While it is important to define specifications for the sensors and the data formats used for the interchange of data between the Mobile ID device and the central system, it is not strictly required to define a format for the database contained in the device, since this does not affect interoperability. The database format should be left to the agencies and their contractors to define.	Replace the first sentence of 6.4.3 with: "If the Mobile ID device will contain a biometric database, its format should be defined by the Agency so that it can support the functions that are to be provided by the device and in accordance to the necessary security requirements (if applicable). An example Database Format is shown in Table 2".	Reject. Delete Table & entire section 6.4.3. Discussion should be held when get to chapter 10.
NPIA/ 16	6.4.3	Database Format	te	Where does this format come from? Why is it mandated? Some explanation would be helpful as to why it matters how a database on a mobile	?	Refer to ITAL/6

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				device is formatted		
FBI-V 8	Page 20	Table 2	Ed	Need column headers for second and third columns		Refer to ITAL/6
Sagem 6	6.4.3	Table 2	Te	Format Identifier should end with a null character '\0' to properly reflect 4 bytes.	Format Identifier: "BDB\0"	Refer to ITAL/6
Sagem/ 7	6.4.3	Table 2	Te	Format Version should end with a null character '\0' to properly reflect 4 bytes.	Format Version: "010\0"	Refer to ITAL/6
Sagem/ 8	6.4.3	Table 2	Te	Database length should be 8 bytes. Current SD technology allows for 32GB [SDHC]. Database length should allow for future increase in size due to better SD technology.	Database Length: 8 bytes	Refer to ITAL/6
Sagem/ 9	6.4.3	Table 2	Te	Number of subjects should be 4 bytes. 2 bytes [~65k subjects] is too small.	Number of Subjects: 4 bytes	Refer to ITAL/6
Sagem/ 10	6.4.3	Table 2	ed	Biometric data should be the one encrypted, not the subheader length	Move "Encrypted with AES-256" to align with Biometric Data field	Refer to ITAL/6
Sagem/ 11	6.4.3	Table 2	ed	Make Table 2 consistent with other tables.	Include column titles "Size" and "Value" for the second and third columns respectively.	Refer to ITAL/6
Sagem/ 12	6.4.3	Table 2	Te	Is the Biometric Data going to be defined by the vendor or by a standard?	Provide further explanation on Biometric Data field	Refer to ITAL/6

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ITAL/ 13	6.5		Te	The use cases should also include the case of electronic identity documents verification. Many Governments are in the process of issuing public tenders for the procurement of devices for the control of e-Passports and it is required to provide some guidelines.	Add this use case, and identify in which category (mild, moderate or severe risk) it can fit.	Reject. Move the risk levels sections outside of fingerprints & re-write to make generic for all 3.
DHS/T SA67	6.5.2	Para 1 sentences 1 - 2	te	The root word "identify" is used here, excluding the function of verification	Change " identification " To " identification/**verification** " (2 instances) AND Change " identified " To " identified/**verified** "	Accept
NPIA/ 17	6.5.2	Severe Risk Environme nts – 1st sentence	ed	Severe risk or loss of life is if a proper a identification is not made – be that through biometrics or other.	Delete 'using biometrics' from the end of the sentence.	Accept
Sagem/ 13	6.5.2	Third paragraph	ed	Iraq is misspelled	Put Iraq versus Irag	Accept
FBI-V 9	Page 21	6.5.2	ed	Mis-spelled "IIRAG" in last sentence		Accept
NPIA/ 18	6.5.2	Severe Risk Environme nts – 3rd sentence	ed	….'review all matches to determine if a match has occurred' does not make sense.	Reword – '…review a returned list of potential matches to see if a true match has occurred'	Accept

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NPIA/ 19	6.5.2	Severe Risk Environments – last but one sentence	te	'For this reason, enrolment and identification functions …must met AppF Specs.' It is only the sensor that is certified to the App F Spec, although that in itself is not guarantee of 'quality'	Delete 'enrolment and identification functions' and replace with 'fingerprint sensors for enrolment and identification in a severe environment must….'	==Accept== ==Refer to ITAL 13 above.==
DHS/T SA68	6.5.2	Para 3 sentence 3	te	Fusion techniques for improved verification accuracy are not limited to "multi-modal" such as fingerprint plus face. The use of multiple fingerprints, or both iris samples is most properly referred to as "multi-instance" fusion.	Change " Increased confidence for verification functions can be met using multi-modal biometric verification. " To "Increased confidence for verification functions can be met using **multi-instance (e.g. 2 or more fingers) or** multi-modal biometric verification. "	==Accept==
DHS/T SA69	6.5.2	Para 3 last sentence	ed	spelling	Change " Irag " To " Iraq "	==Accept==
DHS/T SA70	6.5.4	Para 1 sentence 2	te	Enrollment does not "provide" access control	Change " Enrollment examples would be providing..." To " Enrollment examples would be **preparing for future**... "	==Accept==
FBI-V 34	Page 22	6.5.5	ed	Move all text above the table. Sentence is split by table.		==Accept==
DHS/T SA71	6.5.5	Para 1 sentence 1	ed	"Provide" used twice in sentence, and the "aggressive" aspect applies to the Severe risk cases.	Change " provide aggressive image size and quality requirement needed to meet the different security risk levels... " To " **indicate** aggressive image size and	==Accept==

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				quality requirement needed to meet the **severe** security risk levels… "		
NPIA/ 20	6.5.5	BAP Implementation – Table 3	ed	The use of BAP levels in this doc is not very clear. Are the numbers down the LHS of Table 3 the BAP Levels? – if so it would help to put this in the column heading.	Define clearly what is the BAP level. Is it Column 1?	<mark>Remove the first column that contains "No."</mark> <mark>The numbers were not originally intended to be levels. Each entry links risk and function.</mark> <mark>Refer to DHS 72 below for table restructuring.</mark>
ITAL/ 7	6.5.5	Table 3	Te	During the previous meeting, ITALDATA proposed to revise this table, in order to allow the use of SAP Level 10 devices for identification (see comment ITAL/3, page 18 of the previous meeting comments), and also other agencies noted that they are already using this kind of devices for identification. It was agreed that the entire table had to be revised: however the revised Table 3 does not include the proposed change. We propose to allow, at least as an interim solution, to be removed in the future, the use of SAP Level 10 devices for identification.	In Row 8 of the Table (Use Case: Mild/Identification) change the SAP Level to 10+.	<mark>Accept.</mark> <mark>Change SAP level to 10 + in row 8.</mark>
ITAL/ 8	6.5.5	Table 3	Te	In rows 2 and 5 of the Table (Use cases: Severe/Identification and Moderate/Identification) it is recommended to use four or more fingers. Some AFIS System only use two fingers for identification	In rows 2 and 5, in the "# of Fingers" column, replace "4+" with "4+ if the receiving system is able to manage four fingers, 2+ otherwise".	<mark>Reject.</mark>

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				(and cannot use more since they have only two fingers in the search engines). The number of fingers in these use cases should be "4+" only if the receiving system is able to manage four fingers. If not, it should be possible to capture and transmit only two fingerprints, also to avoid unnecessary bandwidth usage.		
DHS/TSA72	6.5.5	Table 3	ed	The layout of this table as 9 numbered rows is not as intuitive or informative as a 3x3 arrangement, which would allow visual scanning across and down to see the changes in SAP and number of fingers by either constant function or constant risk. NOTE – this style if adopted should be used for all modalities.	See alternative layout – at the bottom of the comments. These two tables could be combined into one, but it may be too busy. The second table could also be purely narrative clauses, no table.	Accept Add a note line at bottom of table. See last page. Two tables will replace one.
DHS/TSA73	6.5.5	Table 3 row #2	te	Terminology for multi-modal and correction in function to IDENTIFICATION	Change " multi- modal biometric verification" To " **multi-biometric fusion** for **identification** "	Partial Accept Change to: " multi- modal biometric identification"
DHS/TSA74	6.5.5	Table 3 row #3	te	Terminology for multi-modal	Change " multi- modal biometric verification" To " **multi-biometric fusion** for verification "	Reject
DHS/TSA75	6.5.5	Table 3 row #5	ed	Capitalization not needed	Change " Mobile Identification" To " mobile identification "	Accept.
FBI-V 10	Page 22	Table 3	ed	Extra slash after 30+ in No. 5 – Sap Levels		Accept.

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FBI-V 11	Page 22	Table 3	ed	"enrol" should be enrolment in No. 4 and No. 7		Accept.
DHS/T SA76	6.5.5	Para 1 sentence 2	ed	Plural needed	Change " Device" To " Device**s** "	Accept.
FBI-V 12	Page 23	Sentence after table	ed	"Device" should be "Devices"		Accept.
DHS/T SA77	7	Title	ed	Use same form for all titles	Change To " **Mobile ID** Facial Image Capture Devices "	Accept.
DHS/T SA78	7.1	Para 1 sentence 1	ed	Usage of "mobile identification"	Change " Mobile Identification " To " Mobile ID "	Accept.
DHS/T SA79	7.1	Para 1 list item 2	ed	The purpose in this entry is purely the Identification	Change " Mobile Identification " To " Identification "	Accept.
FBI -V 13	Page 23	7.1 – 4th para	ed	Need space after "30,"		Accept.
DHS/T SA80	7.1	Last Para last sentence	ed	The term "user" may be incorrect here. If the information is to be used immediately to make an additional capture attempt, then the person to be informed is the "operator"	Change "user" To "operator"	Accept. Refer to DHS3
NPIA/ 21	7.1	Overview – final para	ed	The para starts with 'As is the case with fingerprints, the **mobile device** must ……measure face image quality' However, for fingerprints measuring image quality in	Make this section (and iris quality – 8.1) consistent with fingerprints (6.1) The requirement is for the operator to be provided with (real time) feedback on the quality of the captured images. Common sense says this is best done on the device	Accept To be fashioned similar to response in L1 1.

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				the device is only one of several options for measuring quality. (But note my suggested re-wording)	but it doesn't have to be.	
DHS/T SA81	7.2.1	Para 1 sentence 1	ed	Usage of "mobile identification" - capitalization unnecessary	Change " Mobile Identification " To " mobile identification "	Accept.
DHS/T SA82	7.2.1	Para1 sentences 2 and 3	ed	Avoid the term "user" when referring to the Operator of the device – 4 instances	Change " user " To " operator " 4 instances	Accept. Refer to DHS 3
DHS/T SA83	7.2.1	Para 2 sentence 1	te	The requirement for "ear-to-ear photograph" is not included in Table 4, there is no corresponding entry in table 4 entitled "Camera Focal Length"	Create an entry in Table 4 to include this concept *(editor or designate authorized to compose entry for next draft)*	Noted: Change the name of 7.2.1 to Capture Distance. Change: Cameras used in facial recognition in mobile ID should have 2 to 6 feet separation between the camera and the subject. and Delete last paragraph of 7.2.1.
NPIA/ 22	7.2.2	Camera Controls	te	What is 'Auto Contrast'? Surely this should be 'Auto Exposure' or just plain 'Auto'	Replace auto contrast with 'auto exposure' or 'auto'	Accept
DHS/T	7.2.2 –	entire	Te	The titles in 7.2.1 through 7.2.7 should be aligned	*The editor or designate is authorized to*	Accept.

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SA84	7.2.7 and Table 4			with the first column terms in Table 4. Note the "camera" used in 7.2.x while "capture device" is used in the table. Also the order of appearance should be consistent.	*harmonize these entries.*	
DHS/T SA85	7.2.2	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
DHS/T SA86	7.2.2	Para 1 sentence 1	te	There is a disagreement between this "auto contrast" and the table entry – capture device controls, that addresses auto gain, auto shutter,...	*Harmonize this clause with the contents of the table (not sure what is the correct solution)*	Accept
NPIA/ 23	7.2.4	Photo Image Format	te	Current FR algorithms tend to work with gray scale images. Will this still be the case in 2010?	For a document looking toward 2010 I would suggest recommending colour over G/S.	Noted Delete: "For facial recognition eight bit gray scale images can be used.'
FBI-V 14	7.2.4		Ed	Need to add "minimum of" to the first sentence		Accept.
FBI-V 15	Table 4		ed	Table is missing top line and has a blank row. Also should use lower case "pxl" in the row inter-eye distance (col 40 & 51)		Accept.
DHS/T SA87	7.2.4 and Table 4	Para 1 sentence 1	te	This paragraph cites "in compressed format" but the related table entry "Capture Device Color Space" does not speak to compression	Change here or table 4 to deal with (or not) image compression	Accept. Remove "compressed" from 7.2.4. Refer to ANSI/NIST stnd.

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DHS/T SA88	7.2.6 and table 4	entire	te	This paragraph has no corresponding entry in Table 4	Either delete this clause or create an entry into table 4 to address this topic	Accept. Add a new line to table 4.
DHS/T SA89	Missing clauses		Te	By comparison with the fingerprint section, this section is missing two sections, the parallel to 6.3 Interchange Requirements and 6.4 Security Requirements	*Determine if these are needed here. If so, the editor or designate is authorized to prepare new text for the next draft.*	Accept. Add a 7.3.1 to address type 10 records. See 6.3.2. Refer to DHS 46 above
Sagem/ 14	7.3	Table 5	ed	On Severe Enrollment USE CASE example, remove last sentence "Enrolling all fingers provided additional search capability". Sentence not applicable to face.	Remove last sentence.	Accept.
DHS/T SA90	7.3	Para 2 entire	ed	This material is better suited in the Overview	Move entire paragraph – insert as the first paragraph in 7.1	Accept. Merge with last paragraph
DHS/T SA91	7.3	Para 2 sentence 2	ed	Use of the abbreviation ID is not accurate – change to authentication, or possibly identification/verification?	Change "Capturing facial images provides a non-contact form of ID for situations " To: "Capturing facial images provides a non-contact form of authentication for situations "	Accept. Change to 'identification/verification' in the first sentence.
FBI-V 16	Table 5		ed	Use case in No. 1 and 7 reference fingerprint and it should be face. Also, No. 4 and 7 should say "enrolment".		Accept. A face ad hoc group formed to address unanswered face issues consisting of:

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						Udo Mahlmeister, Brad Wing, Peter Higgins, TJ Smith, Greg Cannon, & Mike McCabe. Table 5 never corrected or completed after the June meeting.
DHS/TSA92	7.3	Table 5 title	ed	"Format" is not the correct term	Change " Format" To " Function "	Accept. But see DHS 2
NPIA/24	Table 5	Face Use cases	te	This section does not appear to have progressed since the last draft and still references fingers.		Accept. Refer to FBI-V 16 above.
DHS/TSA93	7.3	Table 5 entire	Te	Content missing, copied from Fingerprint	*Populate this critical table with face-related information parallel to Table 3*	Accept. Refer to FBI-V 16 above.
DHS/TSA94	8.	Title	ed	The titles for section 6, 7 and 8 should all be aligned. Recommend the style: "Mobile ID *(specific modality)* Capture Devices"	Change " Iris Image Capture Devices " To "**Mobile ID** Iris Image Capture Devices "	Accept
FBI-C 7	8.1	Pg. 29	ed	References SAP level 30, 40, and 51 but Table 6 SAP levels are defined as 20, 30, and 40.		Accept. Change text to 20, 30, 40
DHS/TSA95	8.1	Para 1 sentence 1	Te	The SAP level identifiers are not consistent with Table 6	Change " 30, 40 & 51" To " 20, 30 & 40"	Accept. Refer to FBI-C 7
DHS/TSA96	8.1	Para 2 sentence 2	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept. Refer to DHS 3

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FBI-V 18	Table 6		ed	Blank Row at top of table and lower section does not have lines between each row.		Accept.
DHS/T SA97	8.2	title	ed	Plural required	Change " Requirement" To " Requirement**s** "	Accept.
DHS/T SA98	8.2.1	Para 1 sentence1	ed	Usage of "mobile identification" - capitalization unnecessary	Change " Mobile Identification " To " mobile identification "	Accept.
DHS/T SA99	8.2.1	Para 1 sentences 2-3	ed	The term "user" may be incorrect here. All 3 instances	Change "user" To "operator"	Accept. Refer to DHS 3
DHS/T SA100	8.2.x	entire	Te	Entries are needed in this clause to correspond with table 6, at least for rows in table 6 that vary across SAP level	*Call for contributions needed*	Accept. Ad hoc group formed to address Iris issues; Udo Mahlmeister, Greg Cannon, Rick Lazarick, Charles Wilson, Mike McCabe
DHS/T SA101	Missing clauses		Te	By comparison with the fingerprint section, this section is missing two sections, the parallel to 6.3 Interchange Requirements and 6.4 Security Requirements	*Determine if these are needed here. If so, the editor or designate is authorized to prepare new text for the next draft.*	Partial Accept Remove matching from table 6.

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						Refer to type-17 record.
DHS/TSA102	8.3	entire	Te	This paragraph is not iris related (copy from face??)	*Call for contributions needed*	Accept. To be addressed by ad hoc group refer to DHS 100. Fix "ditto" on table 6, column 2.
FBI-V 17	Page 29 8.3		Ed	3rd sentence references face instead of Iris.		To be addressed by ad hoc group refer to DHS 100.
DHS/TSA103	8.3	Table 6 title	ed	Misspelling	Change " Requirments " To " Requirements "	Accept.
DHS/TSA104	8.3	Table 6	te	Consider adding rows that address illuminator wavelength and illumination intensity	*Call for contributions needed*	Reject
FBI-V 19	Table 7		ed	Margin is cut of on the right hand side or boarder is missing. Also No. 4 and 7 should be "enrolment".		Accept Refer to DHS 72
DHS/TSA105	8.3	Table 7 row #3	te	The number of eyes column indicates 1+ needed for this use case, yet the SAP level 40 requires 2. Is this a significant disagreement? If both are required to be captured and are available, then both will be used, so it would seem most logical to indicate 2 rather than 1+	Change in row #3 " 1+ " To " 2 "	Reject. Make a general table that has examples of severity of risk vs. functions. Ambika Suman will develop a table and for-

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						ward to Peter Komarinski, Peter Higgins, TJ Smith, & Mike McCabe. Comments are requested from the above individuals.
FBI-J 3	9	Para 1	ed	Replace re with are		Accept
FBI-V 20	Page 31 Section 9		ed	Several extra spaces between words and "re" should be "are".		Accept
FBI-V 21	Page 32	Para 3	ed	Missing "the" between "could be" and "use of".		Accept
FBI-V 22	Page 33	3rd bullet in second list	te	What is the benefit of returning images to the field?		Reject Merge paragraphs on pp 32 and 31 addressing candidate list vs. different types of records/images. User requires images.
Sagem/ 15	9.0	Page 32, 3rd paragraph (after last bullet)	ed	Consistency in the use of 'Mobile ID' and 'Mobile-ID'	Change 'Mobile-ID' to 'Mobile ID'	Accept
Sagem/ 16	9.0	Page 32, 4th paragraph	ed	Consistency in the use of 'Mobile ID' and 'Mobile-ID'	Change 'Mobile-ID' to 'Mobile ID'	Accept

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FBI-C 8	9	Pg. 32 Bullet 2	ed	What is the difference between a wanted individual and a subject with outstanding wants and warrants?		Noted Change "wanted individuals" to "individuals of interest".
FBI-C 9	10.1	Pg. 33, 34	Ed	Editorial Comments such as "unless actions are taken to secure this information and its transmission, the mobile device will represent a potentially greater risk"…(paragraph 2) should be removed.	Statement should be made to follow the security policy dictated by the biometric database you are searching	Accept
DHS/TSA107	10.1	Para 4 last sentence	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
NPIA/ 25	10.1	Overview – end of first para	te	….'agencies must develop ….security policies' should be changed to something like 'agencies must adopt nationally agreed …security policies' Any system is only as secure as the weakest link in the chain. As this BPR is designed to enable interoperability, all agencies should ensure they meet agreed standards, and should not develop their own.	Replace 'develop..policies' with "adopt nationally agreed / recognised…policies".	Reject
ITAL/ 9	10.2		Te	The referenced FIPS 140-2 standards are US specific. It could be difficult for a non-US supplier to obtain FIPS certification, and some non-US agencies could require compliance to different security standards.	In 10.2, specify that for US based agencies, the FIPS standards are the ones to be used, while in other countries the agencies could require compliance to different standards that provide an equivalent level of security.	Accept Add a note to the text or incorporate into 10.2.1
NPIA/ 26	10.3.1	User Authenticati	te	Does it matter which biometric is used as the second factor? Some are more 'secure' than others	Reword as 'one of which should be a biometric, providing the total level of user	Accept

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Title: Comments on: MobileID Device BPR - 20080916	Date: October 28, 2008	Document: Approved Proposed Resolution of Comments

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		on		and in some cases a biometric may not even be appropriate or as secure as (say) a user-id / PIN / password / smartcard combination	authentication provided complies with agreed security policies'	Change may to "should"
DHS/T SA108	10.3.1	Title	ed	The term "user" may be incorrect here.	Change "User" To "Operator"	Accept Refer to DHS 3
DHS/T SA109	10.3.1	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change " a user" To " an operator"	Accept Refer to DHS 3
FBI-V 23	Page 35	10.3.2	ed	Missing period at the end of the sentence		Accept
DHS/T SA110	10.3.2	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
DHS/T SA111	10.3.3	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
DHS/T SA112	10.3.4	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
DHS/T SA113	10.3.7	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
ITAL/ 10	10.3.7		te	The concept of "Device Authentication" should be explained in more detail. Does this mean that every Mobile ID device should have a unique ID and that the central system should be able to manage a "black list" of devices (for example lost or stolen)	Add more detail.	Discussed. Add a 2nd sentence .

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				that are not authorised to communicate with the central system ?		TBD
DHS/TSA114	10.3.9	Para 1 sentence 1 and last	ed	The term "user" may be incorrect here.	Change "user" To "operator" two instances	Accept Refer to DHS 3
DHS/TSA115		Para sentence	ed		Change " " To " "	REJECT
DHS/TSA116		Para sentence	ed		Change " " To " "	REJECT
ITAL/ 11	11		te	It is probably worth adding a Paragraph about the TETRA (Airwave) and Tetrapol radio communication networks, which are typically used by many Police Forces in Europe and in the World, and that can guarantee a more reliable communication especially during a critical situation, when cellular networks can likely become unusable due to technical failures or network saturation.	Add paragraph about TETRA and Tetrapol.	Reject.
FBI-C 10	11.1	Pg. 36	ed	Figure 1 reference should be Figure 3.		Accept
Sagem/ 17	11.2	First paragraph, 3rd sentence	Ed	Change 'use of short-range' to 'use of wireless technologies such as' to accommodate future modes and types of wireless technology (such as 802.16/Wimax)	'Dependent on the region of deployment connectivity may make use of wireless technologies such as Bluetooth or Wi-fi connections, cellular data lines, or satellite communications.'	Accept
FBI-V	Page 38	11.9	ed	Header is in different font than all other headers		Accept

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35						
DHS/T SA118	11.4	Para 1 sentence 3	ed	Usage of "mobile identification"	Change " Mobile Identification " To " Mobile ID "	Accept
FBI-V 24	Page 39	12.3	ed	Spelling "tipically"		Accept
FBI-V 25	Page 39	Table 9	ed	First row of table has "-+14" remove minus sign		Accept
FBI-V 26	Page 39	Table 9	ge	Should "a row for Rain" be added to this table?	Rain	Reject But: Change Procedure II to Procedure I on Rain row in table 10. Eliminate "Procedure I" in relative humidity row.
FBI-V 27	Page 40	12.4	ed	Table ref should be "10" not "1"		Accept
Sagem/ 18	13.0	Page 41,	ed	Remove excess period trailing the sentence "The XML Part 2 version of the standard has now been approved".	Remove excess period.	Accept
Sagem/	13.0	Page 41,	ed	Replace "mayl" with "may".	Replace "mayl" with "may".	Accept

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19		2nd paragraph, 3rd sentence				
FBI-V 28	Page 41		ed	Extra period at end of first full sentence at top of page		Accept
FBI-V 29	Page 41	Para 2	ed	3rd sentence has a typo "mayl"		Accept
Sagem/ 20	A.2.2	Last sentence	ed	Consistency in the use of 'Mobile ID' and 'Mobile-ID'	Change 'Mobile-ID' to 'Mobile ID'	Accept
NPIA/ 27	A.2.4	Audio generation and recording	te	Is this section really relevant to tyis document? What does it actually tell us? Does this meet US user authentication requirements? It would not be acceptable in the UK, where 2 factor is a minimum sec requirement but a biometric is not part of that two factor authentication.		Accept: Change title: A.2.2 Audio Generation and Recording To Audio Feedback & see strikeout in document.
Sagem/ 21	A.3.2		Te	Section A.3.2 needs to include a subsection on Fake Finger Detection.	Propose a "Fake Finger Detection" subsection in Section A.3.2	Reject

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					Suggested description: "Mobile devices with the capability to detect fake finger(s) during image acquisition are desirable for increased security and integrity of the device."	
FBI-C 12	A.3.2.1		ed	Finger guides may also assist with reducing sequence errors.		Accept Add benefit
DHS/T SA122	A.3.2.2	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept
Sagem/ 22	A.3.2.9	First paragraph	ed	Use of effect versus affect. The word 'affect' is more appropriate to use versus effect which signifies "to cause to come into being" [Merriam-Webster]	'Aside from the recommendations and requirements listed above for the fingerprint capture device, other factors that **affect** the performance …'	Accept
DHS/T SA123	A.3.2.9	Para 1 list item 9	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
DHS/T SA124	A.3.3.1	Para 1 sentence 1 and 2	ed	Usage of "mobile identification"	Change " Mobile Identification " To " Mobile ID "	Accept
DHS/T SA125	A.3.3.3	Para 1 sentence 1	ed	Usage of "mobile identification"	Change " Mobile Identification "	Accept

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					To " Mobile ID "	
NPIA/ 28	A.3.4.3	Illumination	te	Considering the detail provided for face illumination, it is suprising that this section makes no reference to the fact the iris uses near IR illumination.	Include note that Iris cameras typically require IR illumination	Reject Referred to Iris group.
NPIA/ 29	A.3.4.4	Mechanical Alignments	ed	It took me a while to figure out what this meant. Is it an accepted term? If not a short explanation would be useful.		Noted Delete paragraph
ITAL/ 12	A.4.5		te	Other documents, in addition to the passport, can contain a Machine Readable Zone. It would be better to refer to a generic "MRZ reader", able to read an ICAO compliant MRZ in all the three different documents defined in ISO/IEC 7810:2003 (ID1, ID2 and ID3).	Rename the Paragraph "MRZ Reader". Change the paragraph content with the following: "An MRZ reader, if present in a Mobile ID device, should be able to read an ICAO compliant Machine Readable Zone, in the three different document formats (ID1, ID2 and ID3) defined in ISO/IEC 7810:2003. An OCR software should be integrated in the device, able to analyze the MRZ image and return its content in terms of ASCII characters.	Accept. But, Change Demographic Data to Textual Data in A.4 Title.
DHS/T SA126	A.5.2	Para 1 sentence 1	ed	The term "user" may be incorrect here.	Change "user" To "operator"	Accept Refer to DHS 3
Sagem/ 23	A.5.2.1 – A.5.25		ed	Consistency in font for outline titles.	Change to Arial versus Times Roman.	Accept
FBI-V 36	Page 47	A.5.2.1	ed	"life" should be capitalized in header		Accept

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DHS/T SA127	A.5.2.3	Para 1 sentence 2	ed	Usage of "mobile identification"	Change " Mobile Identification " To " Mobile ID "	Accept
NPIA/ 30	Annex B	Acquisition Considerations	ed	Much of this is covered elsewhere in the doc. Overall it is not clear what the purpose of this section is	Consider what this section is meant to add to the document.	Reject. Keep it in., and Change Acquisitions in the the title to "system Planning"
FBI-V 30	B Page 49	Para 3	ed	Sentence does not make sense		Accept. & corrected. Change to "accessing a resident database.
DHS/T SA128	B	Para 4	ed	The term "user" may be incorrect here.	Change "user" To "**subject** "	Accept Refer to DHS 3
DHS/T SA129	B	Para 5	ed	The term "user" may be incomplete here.	Change "users" To "**Users and operators** "	Accept Refer to DHS 3
FBI-C 13	Annex B	Responses	ed	Business practices should dictate officers should follow standard operating procedures.		Noted. Diane will reword and send to make generic.
FBI-C	Annex B	Legal	Ed	Editorial Comments such as "As the device can easily be abused and deemed a violation of	Users should develop and follow Appropriate	Noted. Diane will reword and send to make

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14				privacy," should be removed.	Use Policy.	generic.
FBI-V 31	Page 50		ed	First two references say "Facialm" should be "Facial"		Accept
FBI-V 32	Page 50		ed	Fourth reference has "20005" should be "2005"		Accept
DHS/TSA131	References	EFTS and EBTS	ed	The S stands for SPECIFICATION, not Standard	Change " Standard " To " Specification " 2-instances	Accept
DHS/TSA132	References	385	ed	This standard is not in the Registry, and is not referenced in this text	Delete this reference	Accept
DHS/TSA133	References to 378 and 381		ed	Form of the references to 378 and 381 are not consistent with the Registry. As listed in the Registry: 9. INCITS 378 INCITS 378:2004 - American National Standard for Information Technology — Finger Minutiae Format for Data Interchange http://webstore.ansi.org/ 10. INCITS 381 INCITS 381:2004 - American National Standard for Information Technology — Finger Image-Based Data Interchange Format. http://webstore.ansi.org/	Change references to: INCITS 378:2004 - American National Standard for Information Technology — Finger Minutiae Format for Data Interchange INCITS 381:2004 - American National Standard for Information Technology — Finger Image-Based Data Interchange Format	Accept
FBI-C 15	References	Pg. 50	ed	There are numerous documents and standards referenced within the document that are not included in the reference section.	All documents and standards referenced should be included in the References Section.	Accept. Diane Casteel will contribute
DHS/TSA134	Glossary	NIST	ed	.....hmmmmmm	Change "Institute for Standards" To "Institute **of** Standards "	Accept.

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NPIA/ 31	Glossary		ed	Add XML		Accept

See following page for tables associated with comment DHS/TSA 73

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	SEVERE		MODERATE		MILD	
	SAP	#FINGERS	SAP	#FINGERS	SAP	#FINGERS
ENROLLMENT	45+	10	40+	6+	30+	4+
IDENTIFICATION	45+	4+	30+	4+	20+	2+
VERIFICATION	20+	2+	20+	2+	10+ 5+	1+ 2+

	SEVERE	MODERATE	MILD
ENROLLMENT	In field enrollment into databases with applications where there is a high risk of loss of life or assets. Some situations may require multi-modal biometric enrollment. Enrollment should achieve an equivalent level of quality as if conducted in a controlled environment using non-mobile devices. Enrolling all fingers provides additional search capability.	Mobile booking: Field cite and release when the violation is not high enough to ensure incarceration until arraignment without bail.	The intention is for verification later (e-citations) is anticipated or an enrollment is sufficient for a normal tenprint to hit against on a many to one search.
IDENTIFICATION	One to many search against a database to identify a subject where there is a high risk of loss of life or assets. Some situations may require multi-modal biometric verification.	In field Mobile Identification of a subject with questionable or no identification.	Rapid identification in custody prior to formal booking. (Typically done at the jail intake.)
VERIFICATION	1:1 match against a credential or database to verify identity where there is a high risk of loss of life or assets. Some situations may require multi-modal biometric verification.	Personal Identity Verification (PIV) Release from custody.	Court Appearance/Parole/Workhouse, Personal Identity Verification (PIV).

1   **MB** = Member Body or Organization (enter 2-4 letter abbreviation)

2   **Type of comment: ge** = minor general **Ge** = major general   **te** =minor technical **Te** =major technical **ed** = minor editorial **Ed** = major editorial. (Take care of Word changing **te** to **Te** etc.

NOTE 1   Columns 1, 2, 4, 5 and 6 are compulsory. If column 4 is **ge**, use **ge** in column two also (and leave column 3 blank) if it applies to the whole document.

NOTE 2   MBs should not change the width of columns, in order to make merging easier.

Note 3   **Please submit this document in .doc format and NOT .pdf**