Org (e.g., NIST-1)	Line Number	Clause/ Subclause	Paragraph/ Figure/Table/ Field	Type of comment (Ed, Te, Ge)	Comments	Proposed change	Disposition	Proposed Resolution
IDTP-1	13	Intro		Ed	2008 version did not use Traditional encoding	With the exceptio of the 2008 version, all the other versions use "Traditional…"	Accept	All of these versions use "Traditional" encoding except for 2008, in which a "'NIEM-conformant encoding'" using eXtensible Markup Language (XML) was adopted.
IRCC-1	202	Section 3		Ed	ICAO 9303 document link has moved	Please ensure the link is correct before final publication	Accept	International Civil Aviation Organization, Document 9303, Machine Readable Travel Documents. https://www.icao.int/publications/doc-series/doc-9303
PTC Laboratories-1	256	4. Terms and Definitions		Ge	There are currently no definitions for sex and gender	Please reference or copy the terms and definitions for "Sex" and "Gender" from ISO/IEC 2382-37:2022(en), Information technology — Vocabulary — Part 37: Biometrics, as follows: 37.07.30 - sex classification as male, female or some other category based on an assessment of primary sexual characteristics or genotype or both Note 1 to entry: Sex is generally assigned at birth by a third-party assessment. Note 2 to entry: Primary sexual characteristics are any of the body structures directly concerned with reproduction. 37.07.31 - gender classification as male, female or another category based on social, cultural or behavioural factors Note 1 to entry: Gender is generally determined through self-declaration or self-presentation and may change over time. Note 2 to entry: Depending on jurisdiction recognition, may or may not require assessment by a third party.	Reject. "Sex" and "Gender" are not used in this document, and therefore should not appear in the Terms and Definitions.	Hold discussion for 2026 addendum (which will include Type-18, an appropriate forum for this discussion)
SNA International-1	256	4. "Terms and Definitions"		Ge	Add a reference to the definitions for the terms "sex" and "gender" found in ISO/IEC 2382-37:2022(en), Information technology — Vocabulary — Part 37 Biometrics (items 37.07.30 and 37.07.31 respectively) or use the same definitions	sex classification as male, female or some other category based on an assessment of primary sexual characteristics or genotype or both Note 1 to entry: Sex is generally assigned at birth by a third-party assessment. Note 2 to entry: Primary sexual characteristics are any of the body structures directly concerned with reproduction. gender classification as male, female or another category based on social, cultural or behavioural factors Note 1 to entry: Gender is generally determined through self-declaration or self-presentation and may change over time. Note 2 to entry: Depending on jurisdiction recognition, may or may not require assessment by a third party.	Reject. "Sex" and "Gender" are not used in this document, and therefore should not appear in the Terms and Definitions.	Hold discussion for 2026 addendum (which will include Type-18, an appropriate forum for this discussion)
NIH/NLM/NCBI-1	256	4. Terms and Definitions		Ge	Add or reference the ISO definition of Gender and Sex	Add or reference the terms and definitions for "Sex" and "Gender" from ISO/IEC 2382-37:2022(en), Information technology — Vocabulary — Part 37: Biometrics, as follows: 37.07.30 sex classification as male, female or some other category based on an assessment of primary sexual characteristics or genotype or both Note 1 to entry: Sex is generally assigned at birth by a third-party assessment. Note 2 to entry: Primary sexual characteristics are any of the body structures directly concerned with reproduction. 37.07.31 gender classification as male, female or another category based on social, cultural or behavioural factors Note 1 to entry: Gender is generally determined through self-declaration or self-presentation and may change over time. Note 2 to entry: Depending on jurisdiction recognition, may or may not require assessment by a third party.	Reject. "Sex" and "Gender" are not used in this document, and therefore should not appear in the Terms and Definitions.	
IDTP-2	353	Sec 4		Ed	finger characteristic is undefined	provide a definition for finger characteristic. Check ISO/IEC 2382-37 Vocabulary,Part 37: Biometrics	Partial Accept. Interestingly, ISO/IEC 2382-37 does not provide that defintion, even in the draft contactless fingerprint definition, which says "method of capturing a finger characteristic without physical contact between the finger characteristic and the biometric capture subsystem (37.02.01) Note 1 to Entry: May include contact with other body parts for positioning and steadying. Note 2 to Entry: Contactless capture may include verbal contact, instructions, interaction, etc. with the biometric capture subject (37.07.03)."	contactless fingerprint capture (n) (syn: touchless fingerprint capture) The method of acquiring a finger characteristic without physical contact between the captured finger characteristic(i.e., the friction ridge structures)and the capture device. Minimal contact may be required to aid in positioning or steadying capture subject. Contactless fingerprint may refer to fingerprint impression type (akin to roll, slap); where a contactless fingerprint image type is one captured with a contactless capture method.
Veridium-1	362	Section 4		Ed	Terms and Definitions is missing COTS	Add definition - COTS Commercial Off-The-Shelf	Accept	COTS Software The term "Commercial Off the Shelf Software" refers to ready-made commercially available software products that can be used to meet requirements.
Interpol-2	523		4. Terms and Definitions page 18	ed	JSON definition missing. Proposed definition is inspired from NIEM JSON Github page https://github.com/NIEM/NIEM-JSON-Spec	JavaScript Object Notation (JSON) is used as data format for exchange of information consistent with NIEM-conformant schemas and information exchange package documentations (IEPDs).	Partial Accept	JavaScript Object Notation (JSON) A data format for exchange of information. This standard will use a JSON model consistent with NIEM-conformant schemas and information exchange package documentation (IEPD) specifications. See https://github.com/NIEM/NIEM-JSON-Spec for additional information.

ID	Line	Line2	Section	Type	Comment	Proposed Change	Resolution	Disposition
SoftGenetics-1	731		4 - definitions	ed	Sex is biometric information that should be added to the definitions for clarity and to differentiate sex from gender. Sex is determined by an external party using sexual characteristics that are any of the body structures directly concerned with reproduction. In contrast, gender is self-declared and may change over time	adding sex to the definitions	Reject. "Sex" is not used in this document, and therefore should not appear in the Terms and Definitions.	Hold discussion for 2026 addendum (which will include Type-18, an appropriate forum for this discussion)
IDTP-3	874	876		Ed	local time zone does not appear to be included in format,	Consider including local time zone in format	Partial accept. This was not included in the 2015 Local dateTime defintion, however it could be permissible in the XML encoding, as long as it is dropped when converting to traditional encoding May need to add a new section for dates in section 5.3 Transformation between encodings in a future update.	5.1.3. Local Datetime Local datetime consists of the year, month, day, and time in hours, minutes, and seconds of the local area (time zone) in which the described activity occurs including . variations, such as Daylight Savings Time. The representation of this varies by encoding: •Traditional encoding – provide date and time in YYYYMMDDhhmmss format, for example 20240301115322 •NIEM conformant XML/JSON encoding – use a specified DateType, e.g., nc:DateTime. Although it is permissible to use a DateType that includes time zone, if used it must be dropped when converting to traditional encoding
fedpol-1	1454		Table 4	Ed	UNK and Undefined do not fit	Under 'description', change Undefined to Unknown	Reject. The value is meant to indicate an undefined color space, not an unknown one (which has guidance to assume sRGB). The code value IS unfortunate, but it has been in use this way since the 2007 version, so changing the code could potentially affect a lot of systems.	Reconsider on next update, to allow more thorough discussion of potential issues.
fedpol-2	1512		5.13.1	Ed	probably to spaces between mimimum and requirement	delete one	Accept. This line was "justified" for some reason. Good eye!	Removed "justification" style from line 1512.
Accenture-2	1599		Table 6	Te	SAP 13 references an old Interchange standard for Facial Quality and formating "ISO Full Frontal facial image (ISO/IEC 19794-5) "	NIST SAP 13 should be updated to align to the quality metrics in ISO/IEC 29794-5; and obviate the Full Frontal format to align with ISO/IEC 39794-5	Reject for 2025.	Normative changes cannot be made at this stage of the document. Topic to be addressed in the 2026 Addendum Facial Images for AFR WG.
Accenture-3	1599		Table 6	Te	SAP 14 references an old Interchange standard for Facial Quality and formatting "ISO Token facial image (ISO/IEC 19794-5) "	NIST SAP 14 should be updated to align to the quality metrics in ISO/IEC 29794-5; and obviate the Token Face format to align with ISO/IEC 39794-5	Reject for 2025.	Normative changes cannot be made at this stage of the document. Topic to be addressed in the 2026 Addendum Facial Images for AFR WG.
fedpol-4	1605		5.14.1.2	Ed	Question from a stranger: what is the difference between 'facial image' and 'face image'? Is there one? (because 'face image' sounds better for me.	Clarify and if necessary, change to 'face image'.	Reject for 2025.	Address for 2026 addendum. We will be reviewing the Face SAPs for the 2026 addendum, this seems like the correct place to discuss.
fedpol-3	1699		Table 8	Te	Did we discuss the max compression ratio? If not, to get a better quality, reduce the max compression ratio to 2:1 (or 5:1 if 2:1 is too much)?	Clarify and if possible change.	Partial Reject. To clarify, these levels were tested and found to be optimal, but they are "Target" Compression Ratios, NOT "Maximums". See discussion notes.	changed labeling to Target Compression Rates throughout the document. If requested, this may be reconsidered on next update, to allow more thorough discussion.
fedpol-5	1916		6.2	Ed	space between 1.013 and DOM	delete spaces	Accept	removed
fedpol-6	1928		6.2	Ed	space missing DOM/	put a space	Accept	Added
IDTP-6	2104		6.9.6	Ed	When the link in line 2104 for the extended feature sets is clicked an FBI page is presented which only states "Wrong domain: Contact your site administrator for assistance"	eliminate or correct the link	Accept	Updated hyperlink
fedpol-7	2490		3) OCF	Ed	weird: Table 1Table 20	delete Table 1	Accept	Deleted unnecessary link
fedpol-8	3242		1) AAV	Te	Use the more common designations.	- Value for Exclusion only - Value for Comparison - Value for Search - No value or suitability terminology	Reject for 2025.	Normative changes cannot be made at this stage of the document. Topic to be addressed in the 2026 Addendum.
fedpol-9	3717		Table	Te, Ed	Which one do I use for a 'face trace'? 0 or 1? + no title present for the table (should be Table 44)	Add or clarify how to send a face trace. Add title of the table.	Partial Accept.	Added link to Table 6 SAP and deleted duplicate table at line 3717. Clarification on the SAP meanings are already linked in the text: "See Section 5.14.1 for detailed information about Acquisition Profiles for face images."
fedpol-11	3874		2) QAV	Ed	link not underlined	underline the link	Accept	applied hyperlink format
fedpol-12	3877		3) QAP	Ed	link not underlined	underline the link	Accept	applied hyperlink format
fedpol-10	3975		6.10.29.1	Ed	A.B.	(A) and (B)	Accept	Each feature point code is represented by a notation "A.B" using a major ('A') and a minor ('B') value. The encoding of the feature point code is given by the numeric ASCII representation of the values of "A" and "B". The period is required, and the maximum size of this entry shall be 5 characters.

ID	Line	Ref A	Ref B	Type	Comment	Proposed Change	Resolution	Applied Change
fedpol-13	4183		6.10.42.	Ed	link not underlined	underline the link	Accept	applied hyperlink format
fedpol-14	4201		2) TAC	Ed	Class bold	unbold Class	Accept	removed bold formatting
fedpol-15	4417		6.10.63.	Ed	Type-21Associated - space is missing	put a space	Accept	added space
fedpol-16	4435		6.10.64	Ed	Handle all the link the same (layout)	Underline all the links	Accept	applied hyperlink format
FBI-1	6890			Technical	The 14.901 FCT field is deemed mandatory only for contactless imagery, but optional for all other capture technology. According to the NIST Contactless BPR, the MMS data is mandatory and therefore the FCT data becomes redundant.	At a minimum, request consideration to revert FCT back to an optional field for the type 14 record, regardless of the technology used to capture fingerprints.	Reject for 2025, reconsider for addendum.	Defer discussion for 2026 addendum
fedpol-19	6981		6.14.45	Ed	Type-21Associated - space is missing	Add space	Accept	added space
Interpol-5	7152		3) MDC Missing Detail Reason Code	ed	"The third information **item** provides additional detail about the reason for the missing"-> "item" duplicate	The third information item provides additional detail about the reason for the missing	Accept	deleted extra word
IDTP-4	2073-2074	6.0 (6.9)		Ge	This section addresses "latent search transactions". Are identification and verification search trans actions still allowed	State if identification and verificaton searches are still allowed in addition to latent searches.	Partial accept. Remove the statement. This language was copied directly from 2015 without change, but it is both incorrect and inappropriate. It reads: "Type-9 records shall contain text describing minutiae and related information encoded from a finger, palm, or plantar image. There is no limit on the number of Type-9 records for a latent search transaction. The Type-9 record shall also be used to exchange minutiae and related information from latent friction ridge images between similar or different systems. "	Type-9 records shall contain ~~text describing~~ descriptions of minutiae and related information encoded from a finger, palm, or plantar image. ~~There is no limit on the number of Type-9 records for a latent search transaction. The Type-9 record shall also be used to exchange minutiae and related information from latent friction ridge images between similar or different systems.~~
FBI-2	2458, 10843			Editorial	Change log indicates "shall be marked" was changed to "should be marked," but in both sections "shall be marked" is still present.	Recommend editorial review to ensure changes truly reflect intent.	Accept. This was a FRWG approved change in order to allow FGP 13 &14 to be used, but was not applied across the many sections that describe this field.	Applied change to both Section F.5.1.2. Field 9.302 and Section 6.9.11.7. 9.302 FPP "Each of the areas present ~~shall~~ should be indicated using the appropriate friction ridge generalized position (FGP)"
Interpol-1	509-510		4. Terms and Definitions page 18	ed	INTERPOL NIST Standard Implementation Working Group is defining and endorsing INTERPOL implementation of the ANSI/NIST-ITL standard	The INTERPOL application profile of the ANSI/NIST-ITL standard, developed by the INTERPOL NIST Standard Implementation Working Group (INSIWG).	Accept	Corrected INT-I entry
fedpol-17	6646 (same comment for palms)		2) ABC	Te	Did we discuss that an image could present with UP? If not, it is more logic to have no image at all.	Modify (UP = always without image)	Partial Accept. Clarify wording to make it clear that this an exception for legacy behavior only. Also apply to 15.018 & 19.018	Revised wording: "'UP' shall be used where there is no image in Field 14.994: EFR or Field 14.999: DATA for the record due to a total lack of available friction ridge detail. Some legacy systems may require a "placeholder" image for proper operation, in which case this may be sent strictly in accordance with the agreement of the interchanging agencies."
fedpol-18	6668 (same comment for palms)		3) MDC	Te	No possibility available if the reason is not known.	Add 'UNK - unknown' in case the information is not available.	Partial Accept.	Added "If the reason for the missing detail is unknown, this field should be omitted." This may be reevaluated for 2026 if a code for "unknown" is desireable (e.g., so that the field can be required in an application profile)
IDTP-5	8622-8623	6.19.33		Ge	The link to the list of Friction Capture technologies is given in line 8622. All the technologies are then presented on line 8623 - Table 101	Consider removing either the link or the Table 101 to ensure consistency.	Reject. The purpose of the website it to provide current, real-world examples of each technology type to assist in correctly identifying the appropriate code. The purpose of table 101 is to provide the codes in an efficient list.	
Interpol-3	865, 872, 880, 888		5.1.1. Local Date 5.1.2. Partial Local Date 5.1.3. Local Datetime 5.1.4. Zulu Datetime / UTC Datetime	te	NIEM conformant XML merged with JSON	Specific lines for NIEM conformant JSON as given in draft	Partial accept.	After looking at the NIEM-conformant JSON documentation, it is apparent that the XML and JSON types will have the same types, so the statements apply to both. Revised language to better reflect that XML and JSON are two differnet encodings rather than one. "NIEM conformant XML ~~or J~~ JSON encoding"
fedpol-20	RT14, RT15 (Record Type)			Ge	Recommendation missing for 1000ppi in the introduction	Add recommendation	Reject for 2025, this is addressed in Section 5.13 Resolution, which is already referenced.	If 5.13 doesn't address commenter's concern, this can be re-evaluated in 2026 addendum.

Accenture-1				te	NIST Subject Acquisition Profiles 13 and 14 refer to an old ISO "Biometric data interchange formats" specification: Level 13 denotes an ISO facial image that meets the requirements of the Full Frontal Image defined in International standard ISO/IEC 19794-5.49 Level 14 denotes an ISO facial image that meets the requirements of the Token Face Image type defined in International standard ISO/IEC 19794-5.49 The current ISO specification for "Biometric sample quality"	I do think that the NIST SAPs should be updated to align to the quality metrics in ISO/IEC 29794-5 and, because there is no Token Face any longer, I would imagine that that would need to be modified accordingly.	[Patrick G] Yep, Token face is a legacy geometry specification from 19794-5 (in which eye centers were at specific locations) which was dropped in the successor 39794-5. Likewise, "full frontal". As Dan suggests just drop 19794-5 references from ANSI/NIST. I think the best, most modern, photography guidance for reference face photos exists in 39794-5 Annex D. Better than ASTM, ISO/IEC 19794-5, ANSI/NIST, AAMVA. On 29794-5, it places requirements on measurements that software should perform on an image. It is not supposed to establish new requirements on photographs, photographers, cameras. It may do so implicitly - but it's not supposed to. Dan may be on to something saying SAPs should align to the 29794-5 metrics.... Would need to look at both side-by-side. Should look at Annex D of 39794-5 first — ANSI/NIST and ISO have been orbiting stars for decades... [Derek N] We may need to check the 19794-6 references and if 39794-5 also covers Anthropometric Landmarks (Section 6.10.29.3). So we may need all three referenced	Comment adapted from email exchange. Replaced by Accenture-2 and -3, but this remains to provide convo thread.
IRCC-2					2.NIST SAPs that should be updated to align to the quality metrics in ISO/IEC 29794-5 and, because there is no Token Face any longer, I would imagine that that would need to be modified accordingly.	See Accenture-1	Reject for 2025.	IRCC is amenable to addressing this comment in the 2026 addendum.
DHS-1		Definitions; Type-2 Descriptive Text Record; Type-18 DNA Record		te	The draft does not explicitly define a "sex" field within the Type-2 Descriptive Text Record, nor does it normatively define the meaning of sex if implicitly assumed. This absence creates ambiguity as to whether sex is intended to represent administrative biological sex, genetic sex, or gender identity, and may lead to inconsistent implementation across systems.	Add an explicit "Sex (Administrative)" field to the Type-2 Descriptive Text Record with a normative definition stating that it represents biological sex as recorded by the submitting authority and is not derived from DNA analysis and not intended to represent gender identity. Add cross-reference language stating that sex and gender attributes are out of scope for the Type-18 DNA Record and SHALL NOT be included therein. Explicitly defining a sex field in Type-2 removes ambiguity, improves interoperability, prevents semantic overloading of demographic attributes, and preserves a clear separation between administrative identity metadata and biometric or forensic evidence. This approach aligns with historical ANSI/NIST practice and ISO/IEC 19794-14 scope separation.	Reject.	Making Normative changes cannot be made at this point in the revision.Hold discussion for 2026 addendum (which will include Type-18, an appropriate forum for this discussion
Interpol-4				te	No appendix with NIEM-conformant encoding rules for JSON.	Add appendix for NIEM-conformant encoding rules for JSON	Partial accept. Revised language in Annex C, NIEM Conformant Encoding Rules to include JSON.	Updated wording in Appendix C to include JSON.