From: Takashi Shinzaki,

Sent: Monday, August 10, 2020 9:28 PM

To: dig-comments-RFC <dig-comments-rfc@nist.gov>

Subject: Comments on SP800-63 (Response to PRE-DRAFT Call for Comments)

Dear NIST members,

I'm Takashi Shinzaki,

As a biometrics expert, I would like to make the following comments.

I noticed the call for comments just before the deadline. I am sorry for

the short comment as there was not enough time to prepare a comment.

Comments on SP800-63B 5.2.3: Use of Biometrics

1. In line with recent advances in biometric authentication technology, it may be appropriate to raise the False Match Rate (FMR) standard (0.001).

In FRVT of NIST, the face authentication shows the usability in at least FMR=0.0001.

- 2. For PAD, it should be referred to ISO/IEC WD 30107-3: Biometric presentation attack detection Part 3: Testing and reporting as revising document.
- 3. For biometric information protection technologies, it should also be referred to ISO/IEC CD 24745, which is currently being revised.
- 4. If biometrics has robust PAD technology, low FMR (e.g. 0.0000001) and renewable biometrics with biometric information protection technology, in this case, is it possible to treat biometric information as secret?
- 5. In the case of biometrics in which biometric information protection techniques using securely managed auxiliary data are applied, it should be treated as a two-factor authentication.
- 6. If biometrics are used for remote identity profiling, the requirements for registration in terms of security should be indicated with respect to the registration of biometrics. For example, in the case of face authentication, registration in live photographing is required in high security systems.

If you have any questions, please feel free to contact me.

Best regards,

Takashi Shinzaki

2 of 2