

From: Dan Molina
Sent: Monday, August 10, 2020 3:16 PM
To: dig-comments-RFC <dig-comments-rfc@nist.gov>
Cc: Steve Thies
Subject: Comments on Digital Identity Guidelines RFC

HELLO!

Integrated Biometrics is interested in ensuring that the NIST guidelines in regards to identity and biometrics are evolving to keep pace with the increased need for strong identity in today's world. We believe that, when identity truly matters, the world needs the strongest possible levels of non-repudiation and attribution possible.

As part of that, we believe that a formal **presentation attack detection** methodology should be implemented to ensure that both contact fingerprints, as well as contactless fingerprints that hope to leverage the current FBI PIV standard are implementing such a requirement in a cohesive way. While supporting Identity Assurance Level 2 is a great aim, we believe that we need to ensure greater liveness detection, and aim towards a lower False Acceptance Rate in PAD testing that includes conductive and non-conductive materials.

We are happy to provide subject matter experts in this subject to assist in the development of these standards, since we feel that is the best use of what is becoming an issue of pan-regional importance.

Regards,

Daniel J. Molina