

In

Subject: DOT comments on draft FIPS 201
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To: <drafftips201@nist.gov>
Cc: "Thompson, Richard" <Richard ...snip... MARAD>" <Jim.Zok@marad.dot.gov>

Thank you for the opportunity to review the draft FIPS 201 Personal Identity Verification for Federal Employees and Contractors. Attached are the Department of Transportation's comments. If you have any questions or need clarification, please contact me on 202-366-4932.

Thanks,

Vicki Lord
Manager, Enterprise IT Security
Office of the Chief Information Officer
Office of the Secretary

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**Department of Transportation
Comments on Draft FIPS 201 and SP 800-73**

Submitted by: Vicki Lord
OST/OCIO
December 22, 2004

Cmt #	Organi zation	Point of Contact	Comment Type (G-General, E-Editorial, T-Technical)	Section, Annex, etc and Page Nbr	Comment (Include rationale for comment)	Proposed change
1	DOT	Rich Thompson 202-366-4678	G	2.2, pp 4-8	Agencies are organized in various ways and allocate responsibilities differently with regard to issuing identification cards and meeting personnel security requirements. At some agencies, for example, the personnel security organization is not the same one that issues ID cards. We believe that it is not necessary for proper identity proofing for this section to be as specific as it is regarding the processing procedures and the roles of the different officials and authorities. Requiring a PIV Registration Authority, as an example, to perform both identity proofing and background checks is not needed to ensure that an agency reviews the required documents and initiates the appropriate background investigations. The paragraph should state the basic requirements that an agency has to meet and the agency should be given the freedom to meet the requirements in the way that it wants to do so and is most appropriate for the agency's size, mission, organization, and structure.	Revise this paragraph to simplify it and allow for agencies to establish their own specific processing procedures.
2	DOT	Rich Thompson 202-366-4678	T,E	2.2, p 5	The PIV Issuing Authority is described as the entity that issues the identity credential after identity proofing, background checks, and "related approvals" have been completed. The draft does not explain what the related approvals are.	Delete the wording about "related approvals" or explain what they are.
3	DOT	Rich Thompson 202-366-4678	T,E	2.2.1, p 5	The paragraph begins by referring to "The paper-based source documents." There is no previous mention of such documents or what they are.	Begin the sentence, "Paper-based ...", or provided needed background or introductory information.
4	DOT	Rich Thompson 202-366-4678	G,T	2.2.1, p 5	The second paragraph states that an applicant applies for an identity credential as part of the vetting process for Federal employment. That is not necessarily the case, nor should it be a required part of a human resources organization's application and examining process. Also, many persons who are not Federal employees will be receiving credentials/identification cards.	Eliminate the sentence.

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5	DOT	Rich Thompson 202-366-4678	G, T	2.2.1, pp 5-7	<p>This section describes position sensitivity levels along with the forms that are required and the type of background checks that must be performed. These requirements generally parallel, but do not accurately reflect, the Government procedures that have already been established for designating positions by risk and/or sensitivity levels and the background investigation requirements that are commensurate with those levels. (The levels are: Low risk, moderate risk, high risk, noncritical-sensitive, critical-sensitive, and special sensitive.) The Code of Federal Regulations (CFR) spells out these levels and establishes basic investigative requirements. (Refer to 5 CFR 731 [Suitability], 5 CFR 732 [National Security Positions], and 5 CFR 736 [Personnel Investigations].) Separately, the President has approved investigative requirements for access to the different levels of classified information (Confidential, Secret, Top Secret, and Sensitive Compartmented Information). When a position requires the incumbent to have access to classified information, that need for access affects the position sensitivity designation. For example, a position requiring access to Top Secret information must be designated at least critical-sensitive.</p> <p>We consider it confusing for NIST to propose an identity assurance policy that also establishes position sensitivity levels as shown in this draft, particularly in Table 2-2. This table contains no specific mention of the sensitivity levels for national security positions as specified in 5 CFR 732 and appears to establish a separate system of sensitivity levels using, in part, risk level terminology as stated in 5 CFR 731. The draft Standard also attempts to unnecessarily set investigative requirements that overlap the established ones. We question the value of specifying investigation types separate from those already in effect for Federal employees. With regard to Table 2-1, the position sensitivity or risk level (they are not the same thing) governs the form that a person must complete to initiate an investigation. For persons in low risk positions, the appropriate form is the SF 85, Questionnaire for Non-Sensitive Positions. For moderate risk and high risk positions, the two types of Public Trust positions, the required form is the SF 85P.</p>	<p>Revise this section to simplify it and focus primarily on the actual identity verification requirements. To avoid overlapping and/or conflicting standards within the Federal Government, cite the CFR, appropriate Executive Orders, and OPM directives for policy and procedures regarding all personnel security matters.</p>

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6	DOT	Rich Thompson 202-366-4678	G	2.2.1 and 2.2.3, pp 5-7	<p>Questionnaire for Public Trust Positions. For any national security position (noncritical-sensitive, critical-sensitive, or special-sensitive), the required form is the SF 86, Questionnaire for National Security Positions. Each of these forms, for which the Office of Personnel Management (OPM) is the lead agency, has been approved by the Office of Management and Budget following extensive coordination with the Justice Department, and each is approved for use for the types of positions specified. This draft Standard should not attempt to require anything differently with regard to the use of the forms from what is already established OPM policy. There should be no requirement for someone to complete a form that is contrary to its approved use and the conditions specified in the Privacy Act statement on the form. Also, if the person is in a national security position and is required to complete the SF 86, there is no point in also requiring the SF 85P.</p>	
					<p>COMMENT: The paragraph on page 6 beginning, "The Registration Authority shall conduct ..." includes the sentence, "After successful completion of the appropriate background check, the Registration Authority shall notify the Issuing Authority that an identity credential can be issued to the Applicant." We consider it unrealistic to expect an agency to have a completed investigation on everyone to whom it issues an identity credential. Agencies hire many employees every year pending initiation and/or completion of a background investigation. In addition, many agencies issue identification cards on a short-term basis to persons who will be at their facilities for limited periods of time, less than the time that it would take to complete an investigation. Strictly applying this requirement as written, employees in low risk positions who undergo less extensive investigations might be issued identification cards that allow them into Federal facilities much sooner than persons in high risk positions whose investigations are more in-depth and take longer to complete. Some agencies (but not all) have the capability of conducting fingerprint checks electronically with the FBI and performing other checks short of a full investigation before issuing identification cards. However, it is not</p>	<p>Eliminate the requirement for a background investigation to be complete before a person receives an identity credential. Require only that the person submit any forms needed for an investigation. Forms must be properly completed.</p>

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7	DOT	Rich Thompson 202-366-4678	G	2.2.1, pp. 5-8	<p>practical to require that agencies have extensive investigations completed prior to issuing an identification card or credential. We do support a requirement that persons provide all forms needed for any required investigation, and that these forms be properly completed, prior to agencies issuing permanent identification cards. Paragraph 2.2.3 imposes the same requirement, clarifying that persons shall not be issued "long-term identity credentials but shall be treated according to visitor procedures." At our agency, as at many others, visitor procedures include a constant-escort requirement. It is unrealistic to expect agencies to follow those procedures for an extended period of time for a specific employee just because the employee's background investigation is not complete. Also, the paragraph does not define "long-term."</p>	
					<p>We have reservations about relying extensively on background investigations to verify identity, especially the types of checks or investigations that are conducted on the majority of Federal employees and contractor employees (e.g., fingerprint checks, NAC's, NACI's, etc.). A fingerprint check, for example, does not verify identity. A more extensive investigation may reveal a situation where someone has assumed a false identity, especially if the person only assumed that identity within the past few years. (By extensive investigation we mean one such as a Background Investigation [BI] or Single-Scope Background Investigation [SSBI], the more expensive and time consuming investigations that it is not practical to conduct on all persons to whom agencies want to issue ID cards.) The longer the period of time over which someone has maintained a false identity, however, the less likely it is that the investigation will reveal it. Even if the person has a criminal record, the false identity will not be apparent if the records are all under the same fictitious name. We are not saying that background investigations are of no value in verifying identity, only that what we are able to do on the majority of people is of limited value in this regard. One should be careful not to overstate</p>	<p>None beyond the one stated following our previous comment: Eliminate the requirement for a background investigation to be complete before a person receives an identity credential. Require only that the person submit any forms needed for an investigation. Forms must be properly completed.</p>

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					their value or give them too much weight in identity assurance.	
8	DOT	Rich Thompson 202-366-4678	G	4.1.4, pp 19-22	The format has no room to place a second agency seal. RATIONALE: Some organizations have the seal of the parent department as well as the agency on their identification cards.	Allow for the placement of a second seal if desired by an organization. (Adoption of other recommendations herein would facilitate this.)
9	DOT	Rich Thompson 202-366-4678	G	4.1.4, Throughout	Font sizes such as 6, 7, and 10 are sometimes relative to the system that is producing the card, and may not be the same among different manufacturers.	Incorporate a height specification along with the font size to ensure the desired result.
10	DOT	Rich Thompson 202-366-4678	G	4.1.4.1, pp19-20	The standard format shown does not allow agencies enough variation to make a card that is distinguishable from other organizations at distance. RATIONALE: Organizations that require that identification cards to be displayed at all times within their buildings must have the ability to recognize non-assigned personnel within their buildings.	Specify mandatory and optional information to appear on the card front, along with their sizes, but do not specify locations of the data.

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11	DOT	Rich Thompson 202-366-4678	G,T	4.1.4.1, pp 19-20	The chip should be placed on the back of the card. RATIONALE: In the early days of contact card development, the chip was placed on the front of the card as an attractive marketing technique. Now that the novelty has worn off, and with the increased information that must be squeezed onto the front of the card, it makes more sense to relegate the chip to the back side of the card. The technical problem of printing over the bump created by the chip was solved, and FDIC has employed a back-side chip for years now. The new-found space can be used to increase the size of the picture, seals, and fonts for better clarity.	Locate the chip on the back rather than the front of the card.
12	DOT	Rich Thompson 202-366-4678	E	4.1.4.3.f, p 22	The seal is associated with a font size.	Delete the sentence regarding the font size as inappropriate for describing a seal. Use a height or square inch/cm specification instead.
13	DOT	Rich Thompson 202-366-4678	G	4.1.4.4.d, p 22	The text reads as follows: "...After credential verification, bearer should be given access to controlled areas." Not every person carrying a card with the emergency responder statement is necessarily authorized through every police or security line. Our proposed wording reinforces the authority of the officer on the scene to grant or deny access depending upon his/her instructions.	Change the text to read: "...After credential verification, bearer may be granted access to controlled areas."
14	DOT	Rich Thompson 202-366-4678	G	4.1.5.2, p 23	The term, "a priori knowledge" is used. Plain English should be used whenever possible.	Use the term, "prior knowledge."
15	DOT	Rich Thompson 202-366-4678	G,T	Tables 2-1, 5-1, pp 6 & 41	As written, Tables 2-1 and 5-1 give the impression that the documents required by Form I-9 would not be needed for higher Position Sensitivity Levels.	If these tables are to list forms, then the Form I-9 (actually, the documents required by Form I-9) should appear as a requirement for all position sensitivity levels.

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16	DOT	Rich Thompson 202-366-4678	G	5.2.1 & 5.2.2 pp 40-41	Although the introductory sentence to Section 5.2 states that the requirements specified in this section are in addition to those specified in Section 2.2, much of the material in these two sub-sections is a confusing repetition of Section 2.2. It contains many of the same defects and in some places is contradictory. For example, 5.2.1.3 states that an application and approval process must be established using a method approved by OMB; while 2.2.4 (p.7) states that the Bureau of Diplomatic Security, Department of State, must approve the method.	Combine all of the requirements into one, easy-to-follow section. Concentrate on the basic requirements and avoid specifying details of processes that agencies can establish for themselves.
17	DOT	Rich Thompson 202-366-4678	E	5.2.1 p 41, second sentence below Table 5-1	As reads: "In addition, the Applicant shall appear in person and provide two forms of identity source documents originally provided to the PIV Requesting Official. RATIONALE: Proposed change will provide better clarity.	"In addition, the Applicant shall appear in person and provide the same source documents that were offered as proof of identity to the PIV Requesting Official."
18	DOT	Rich Thompson 202-366-4678	G	5.2.1, p 41 following Table 5-1	The paragraph begins, "The Applicant shall provide the completed form ..." As we stated in an earlier comment, agencies are organized in various ways and allocate responsibilities differently with regard to issuing identification cards and meeting personnel security requirements. At some agencies, for example, the personnel security organization is not the same one that issues ID cards. Requiring a PIV Registration Authority to do all of the things mentioned in this paragraph (inspecting documents, fingerprinting, conducting (or initiating) a background check, photographing person, etc.) is not necessary. The paragraph should state what an agency has to do and the agency should be given the freedom to meet the requirements in the way that it wants to do so.	Revise this paragraph to simplify it and allow for agencies to establish their own specific processing procedures.
19	DOT	Rich Thompson 202-366-4678	E	5.2.1 p. 41, first line of paragraph following Table 5-1	The text reads as follows: "The Applicant shall provide the completed form to the Registration Authority..." "Registration Authority" is not defined in section 2.1, Glossary of Terms, but "PIV Registration Authority" is defined. The term as set forth in the glossary should be used; or "PIV" should be deleted from the term in the glossary.	Add the word "PIV" to Registration Authority, or at least be consistent throughout the document.

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20	DOT	Rich Thompson 202-366-4678	G	5.2.1 p 41 middle of paragraph below Table 5-1	The text reads as follows: "The Registration Authority shall conduct the appropriate background check..." Waiting for an agency to conduct a background check may cause unacceptable delays in issuing an identification card.	Delete the specific requirement for the Registration Authority to either conduct or initiate a background check. If the sentence is retained, change the word "conduct" to "initiate."
21	DOT	Rich Thompson 202-366-4678	E	5.2.1.1 p. 41 penultimate sentence	The text reads as follows: "Two of the Applicant's fingerprints shall be securely maintained..." The requirement as written is confusing. It could mean, for example, that 2 copies of a 10-print set are required, or perhaps the prints of only two different fingers, e.g., an index and thumb print, are needed. How are the fingerprints to be maintained...paper copy or electronic? And why two copies?	Clarify the requirements regarding fingerprints.
22	DOT	Rich Thompson 202-366-4678	G	5.2.1, p 42, first line on the page	The text reads as follows: "After successful completion of the appropriate background check, the Registration Authority shall notify..." Depending upon the type of "appropriate" background check, it may take weeks or months to complete it.	Change "After successful completion of" to "After the necessary paperwork is obtained for."
23	DOT	Rich Thompson 202-366-4678	G	Table 5.2 p. 42 at "1 Low"	The text reads as follows: "Authentication of Applicant Identity Source Documents conducted by entity responsible for authorizing PIV card issuance (checking and verifying validity with each Document's Issuer). Law enforcement check (Fingerprint)" As written, this requirement would be very difficult for agencies to meet. It appears to require, for example, that the card issuer call a State Bureau of Vital Statistics whenever a birth certificate is presented. Not only do Federal agencies not have the resources to pursue this requirement, the State agencies would soon stop responding to such requests because of the drain it would cause on their resources.	Clarify the requirement of this section.
24	DOT	Rich Thompson 202-366-4678	E	5.2.1.2, p 42	The text reads as follows: "...for current employees expect that background checks..."	Change the word "expect" to "except."

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25	DOT	Rich Thompson 202-366-4678	E	5.2.1.1, p 42	The text reads as follows: "...results of the most recent previous check are on-file and can be referenced..."	Use a space vice a hyphen in "on-file."
26	DOT	Rich Thompson 202-366-4678	E	ANNEX D	In two instances, the text reads as follows: "PRSI Personal Subject Interview" The term, "PRSI" is not clearly defined; it must be inferred from the words following it.	If PRSI stands for "Personal Subject Interview" then the abbreviation is not really needed; or it could be shown as: "Personal Subject Interview (PRSI)"
27	FAA AIS-500	Ed Harras 202-385-8165	E	4.1.4, pp. 19-22	It is difficult to follow the mandatory vs. optional fields on the card; presentation of the topography requirements over these pages is somewhat confusing, requires flipping back and forth.	Suggest better use of visuals and typefaces to illustrate the elements of the card.
28	FAA AIS-500	Ed Harras 202-385-8165	E	Table 4.4, pg. 26, and 4.5, pg. 28	Significance of 2007/2010 change-over dates for algorithms is not explained.	Explain in a sentence why longer key lengths are required after 12/31/10
29	FAA AIS-500	Ed Harras 202-385-8165	E	4.4.4, pg. 34	Para. 1 of this section uses term "PIV card authentication; para 2 refers to "PIV card approval." It is not clear what "approval" means in this case.	Clarify use of term "card approval."
30	Biometric Associates, Inc. (FAA)	Doug Kozlay 410-252-7210	T	4.1.4, Card Topography		Have an alternate use for Optional Zones 10 and/or 11 for an on-card biometric sensor. This provides an "official" location on the card for this capability.
31	Biometric Associates, Inc. (FAA)	Doug Kozlay 410-252-7210	T	4.4.6, Protection of Biometrics	The CMS external digital signature for biometrics should include an indicator for whether the card will perform user authentication. This will prevent the necessity of redundant biometric authentication at the reader.	

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32	Biometric Associates, Inc. (FAA)	Doug Kozlay 410-252-7210	G	6.1, PIV Card Authentication Mechanisms	Contactless use of PINs and biometrics is supported only when used in conjunction with PACS-compliant challenge-response authentication using the CHUID and SSK. Also, any PIN or biometric data exported from the card must be encrypted.	Keep the standard open to the next innovation, contactless cards with on-card biometrics and a cryptographically-protected wireless link. The current draft reads "For privacy reasons, contactless use of PINS and biometrics is not supported."
33	FHWA	Cheryl Ledbetter, 202-366-9030	E	4.1.4.2.b, p. 21	"...identifier, consisting of s of six characters..." appears to be a typo	Change to "...identifier, consisting of six characters..."
34	FHWA	Cheryl Ledbetter, 202-366-9030	G	5.2 and its subsections, p 40	Adds new and current employees but makes no mention of new and current contractors. Are we to assume that new and current contractors are to follow the process for new and current employees?	Add clarification language to address new and current contractors.
35	FHWA	Cheryl Ledbetter, 202-366-9030	E	5.2.1.1, second and third bullet, p 41	Third bullet is a continuation of the second bullet.	Combine second and third bullets.
36	FHWA	Cheryl Ledbetter, 202-366-9030	E	5.2.1.1, sentence before Table 5-1	Sentence is grammatically incorrect.	Add the word "in" before Table 5-1.
37	FHWA	Cheryl Ledbetter, 202-366-9030	G	5.2.2, p 43	The statement "actual issuance may occur during the initial visit to the Issuing Authority or may occur at a later date." This sentence implies that the applicant visits the issuing authority but nowhere in the previous sentences is it mandated that the applicant visit the issuing authority. However the applicant must visit the registration authority.	If a visit to the Issuing Authority is required it needs to be clearly stated.

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38	FHWA	Cheryl Ledbetter, 202-366-9030	E	6.1, second paragraph, p 49	The sentence reads "For privacy reasons, contactless use of PINs and biometrics is not supported.PINs and biometrics may be used with the PIV card using contact readers."	Sentence should read "For privacy reasons, contactless use of PINs and biometrics is not supported. PINs and biometrics may be used with the PIV card using contact readers."
39	FHWA	Cheryl Ledbetter, 202-366-9030	E	6.1.4, second sentence, p 52	The sentence as written is grammatically incorrect.	