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Subject: Comment on Draft FIPS 201  
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Section 4.2 specifies that the CHUID shall be accessible from the contactless interface without card activation.

The CHUID, as defined in PACS v2.2, has a mandatory FASC-N field which includes information regarding the issuing agency and organization and the category of person to whom it is issued. In addition, Draft 201 adds a position sensitivity level to the CHUID.

All of this information is trivially subject to terrorist exploitation through clandestine contactless access, contrary to HSPD-12 (3) (b).

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