

December 21, 2004

To: National Institute of Standards and Technology
From: Interagency Advisory Board
RE: Federal Information Processing Standard 201 Rewrite

Attached, please find the collective submission of all agencies served by the Government Smart Card Inter-Agency Advisory Board (IAB). The IAB, in performing its task in accordance with the Terms of Reference between National Institute of Standards and Technology (NIST) and the IAB with respect to authoring of the NIST Special Publication (SP) 800-73, identified several issues directly impacting the SP800-73 in the November 8, 2004 Public Draft FIPS 201.

This effort represents a significant re-write of the public draft Federal Information Processing Standard (FIPS) 201. The resulting document re-organizes responsibilities, roles and systemic architecture to more accurately align with industry best practices, government processes for large scale credentialing and access control solutions. Key areas are:

- Separation of ID verification, validation and credential issuance from all other parts of the system:
 - Definition that ID Verification and Validation is in scope;
 - Established chain of trust for ID;
 - Removed technical specifications for card management;
 - Definition that trustworthiness for particular job/role is out of scope.
- Enhanced definition of the PIV credential's role in inter-agency interoperability by providing validated use case scenarios.
- Removed technical and informative discussion on Physical Access Control Systems and Logical Access Control Systems. The IAB resolved this information should be supported by OMB through technical implementation guidance and policy with a phased implementation plan.
- Clarification of role for SP800-73 to support the PIV application on the ICC. Enhanced this specification to provide complete definition of the PIV application, technical specifications and reference to existing NIST approved standards for compliance.

These changes represent a substantive impact on the original draft of the FIPS 201. The IAB offers to support NIST in understanding these changes. The IAB recommends NIST hold a discovery and rationale session to seek information from all parties submitting comments. The IAB will fully support this session at NIST's earliest convenience.

Enclosures:

2004-12-21 IAB FIPS 201 comments submission.xls – IAB Formal comments submission in the NIST required spreadsheet format

2004-12-21 IAB FIPS 201_Version 2_Final.doc – IAB Recommended revisions to FIPS 201

2004-12-21 IAB FIPS 201 Summary Changes.ppt – IAB Presentation summarizing the major elements of change in powerpoint presentation form

Enclosure(s):

Interagency Board Summary of Comments

IAB Recommended Changes to PIV

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