

Cmt #	Organization	Point of Contact	Comment Type (G-General, E-Editorial, T-Technical)	Section,Annex,etc and Page Nbr	Comment(Include rationale for comment)
1	Cogent Systems, Inc.	Anne Wang / Xian Tang	T	Section 4.4.1, Page30-31. Section 4.4.3, Page 31-32	It is stated in section 4.4.1 that a complete set of ten 'slap' fingerprints should be submitted for biometric identification search, and section 4.4.3 provides all the requirements for biometric enrollment. We believe that it should be explicitly specified that fingerprints from the submitted set of 'slap' fingerprints should be used as enrolled images to be embedded in the PIV card, and that the live-captured fingerprint should not be used as the image to be embedded in the PIV card.
2	Cogent Systems, Inc.	Anne Wang / Xian Tang	T	Section 4.4.3, page 32	It is stated in section 4.4.3 that NFIQ method shall be used as the mechanism for making an acquisition-time quality assessment, but there is no mention of the minimum quality requirement for biometric enrollment. We believe that a guideline on quality control should be provided to prevent images of poor quality from being enrolled.
3	Cogent Systems, Inc.	Anne Wang / Xian Tang	T	Section 4.4.4, page 34	It is stated in section 4.4.4 that the image resolution and pixel depth requirements for authenticaiton should be the same as specified for card enrollment, but no specifications are provided for image size. We believe that the requirement for mimimum image size should be established for better verification performance and interoperability.

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4	Cogent Systems, Inc.	Anne Wang / Xian Tang	T	Section 4.4.5, page 35-37	This section specifies requirements for facial image such as image type, expression, color space, etc. We believe that two more requirements should be added. One is lighting condition when the facial image is taken. The other is pose of the subject. It will be beneficial to automatic identification if all facial images are taken in the samecontrolled lighting conditions and if all subjects are restricted from rotating horizontally and vertically.

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