X-Sieve: CMU Sieve 2.2
To: draftfips201@nist.gov
X-Mailer: Lotus Notes Release 6.5.2 June 01, 2004
From: timothy.p.ruland@census.gov
Date: Thu, 23 Dec 2004 13:37:29 -0500
X-MIMETrack: Serialize by Router on LNHQ08MTA/HQ/BOC(Release 6.5.2|June 01, 2004) at
12/23/2004
 01:37:30 PM
X-Spam-Status: No, hits=-4.5 required=4.0 tests=AWL,BAYES_00 autolearn=ham
    version=2.64-2004121301
X-Spam-Report:
    * -0.5 BAYES_00 BODY: Bayesian spam probability is 0 to 1%
    *     [score: 0.0000]
    * -4.0 AWL AWL: Auto-whitelist adjustment
X-Spam-Checker-Version: SpamAssassin 2.64-2004121301 (2004-01-11) on
    dispatch.tco.census.gov
X-MailScanner:
X-MailScanner-From: timothy.p.ruland@census.gov
Subject: Comments

Comments:

1.  While the guidance as written seems fairly straight forward for most
typical Federal network environments and systems, the Census Bureau faces
some unique challenges in developing, fielding, and supporting its massive
Decennial Census operations.  We typically have approx. 500,000 temporary
field enumerators that perform data collection efforts for periods of 6-8
weeks at a time during the Census operations. The requirements of HSPD-12
and FIPS 201 as written, particularly with no possibility of any kind of
waivers will have a severe impact on our operations. Both in complexity and
cost.  We are looking at testing the feasibility of using hand held
computing devices with encryption and specialized applications on them to
perform these functions.  With the large number of enumerators we are
looking at, the short amount of time we have to complete the Census work
under the time constraints of our Constitutional reporting deadlines I
would respectfully recommend that some leeway in the form of modified
guidance be addressed to meet specialized requirements.  I understand you
cannot write FIPS or Special Publications to address each unique situation,
but with no possibility of relief from the letter of the guidance the
Census Bureau will be face a severe impact on its most complex and
important program, the Decennial 2010 Census, and the tests leading up to
it.

2.  There needs to be a better definition of what is logical access is
meant to be controlled by the publication.  As written, we interpret this
to mean employees who access our email system (using the Internet) would
require smartcard readers. We developed our Lotus Notes environment to
support users accessing iNotes from the Internet. This allows flexibility
for users on travel or at conferences. FIPS 201 as written seems to take

this capability away from our employees.

3. As written, the term logical access to a system could also mean access to devices like Blackberry systems, etc. Is this the intent? That any IT resource must have logical access control through the smartcard in place?

Thank you for the opportunity to provide my comments/concerns.


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"Any man worth his salt will stick up for what he believes right, but it takes a slightly better man to acknowledge instantly and without reservation that he is in error" - Andrew Jackson