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Sent: Monday, May 09, 2005 5:07 PM  
To: FN-OMB-Eauth  
Cc: Sandy Merola  
Subject: Comments on Draft PIV Guidance from LBNL

From: Sandy Merola, CIO Lawrence Berkeley National Laboratory  
To: Jeanette Thornton, Office of Information Technology and E-Government  
Re: Draft PIV Guidance Comments

Thank you for the opportunity to comment on OMB's Draft Guidance on PIV Implementation. We appreciate the direction and content of this guidance which takes into account the diverse ways in which the Federal Government does business, some of which are uniquely impacted by PIV.

As you are aware, the Federal Government operates 37 research facilities in the form of Federally Funded Research and Development Centers (FFRDCs), contractor operated research facilities with few if any Federal employees onsite.

These unique facilities vary from completely open research centers to those doing work in both unclassified and classified research. However, many if not all the FFRDCs share a common characteristic: like universities, their success is based in large part on their ability to collaborate with experts and researchers from other institutions both in the United States and around the world.

For example, in the case of the unclassified DOE Office of Science Laboratories, experimental facilities are operated to be used by researchers from all over the globe. Indeed, the increasingly international character of large scale science is a key driver of our success in pursuing scientific accomplishments, as well as driving down the costs of operating these resources. Facilities like Lawrence Berkeley National Laboratory, which is operated by a university, adjacent to the Berkeley campus, and shares resources, faculty, and students with the campus, look much more like a university with regards to their access needs, then like most of the rest of the Federal enterprise.

Taking into account this similarity we encourage you to add language reflecting the connection between academic facilities and FFRDCs to the guidance:

1.C.3 Does not apply to "FFRDCs or other" academic locations who conduct activities on behalf of department or agencies or at which Federal employees may be hosted unless specifically designated by the sponsoring

department or agency. (suggested addition in quotes).

Adding FFRDCs to this guidance places the responsibility for determining applicability on the managing agency, while sending a clear message that these unique research centers may be exempted if the agency believes the impacts to collaborative research outweigh the benefits of a unified identity.

The FFRDCs, especially the open research facilities, would be seriously impacted by PIV. Many of these facilities conduct only publishable, open research and rely for their success on direct collaboration, often via unique computing resources, with researchers around the globe. Indeed, we operate many computing and research facilities to serve these users directly. It is not clear how we issue PIV credentials to these collaborators, many of whom do not even physically enter our facilities, but require access to experimental systems.

We encourage OMB to recognize the unique needs of these facilities as well as their similarity and close connections to the academic locations you have already exempted by adding FFRDCs explicitly to the guidance.

We are available at any time to provide additional information about how

PIV might impact our collaborative work. Thank you for taking the time

to gather input on this important project.

AX (Sandy) Merola  
CIO, Lawrence Berkeley National Laboratory