GSA Comments to OMB Implementation Guidance for HSPD 12

1. Page 5, Part 1, Para. B. We would like further clarification/guidance on what it means to accredit the registration process.
2. Page 6, Part 1, Para. E.   It was our understanding that PIV-1 was primarily concerned with the personal identity proofing process and not implementation of an electronically enabled access control system.   The Rapid Authentication requirement sited here seems to be very similar in nature to the Credential Authentication requirement in Part 2, Para C.   We recommend moving this to Part 2.
3. Page 6, Part 2, Para E. We would like further clarification of the requirements for logical access and the use of PKI. Is PKI going to be mandatory for all new and/or legacy systems that require network access? Is PKI only going to be mandatory for systems that are at "level 3" according to their e-authentication risk assessments? Can we use another acceptable level 3 authentication mechanism in place of PKI? What does "system access should make use of the identity credential as part of the system access protocol" mean? What does "compliance with the Standard requires the activation of at least one digital certificate on the identity credential for access" mean?
4. General.   How does the accreditation of PIV service providers, the certification and accreditation of IT systems, and the accreditation of the registration process relate to each other?