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Sent: Monday, May 02, 2005 2:14 PM
To: FN-OMB-Eauth
Cc: Hhs, Secureone (OS); Madden, Thomas; Gatland-Lightner, Cheri; Morales, Mario
Subject: Comments on the draft department and agency implementation guidance on Homeland Security Presidential Directive 12(HSPD-12)

The following comments are for the OMB draft implementation guidance on HSPD-12.

1. III.3 is inconsistent with FIPS 201 and both actual and feasible practice. Per the final version of FIPS 201, the NACI does not have to be completed prior to issuance of the PIV card (just the NAC, with revocation of the card if the NACI fails). The NAC can be completed within hours or days, but the NACI takes approximately a month. The draft of FIPS 201 indicated that the NACI would have to be completed, but there was significant concern that this would have a dramatic negative impact on operations.
2. Numerous PIV II (identity card) requirements are included in the PIV I (identity proofing) section of the document.

Thanks,
Roger

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