The National Institute of Standards & Technology

c/o Annie Sokol

100 Bureau Drive, Mailstop 8930,

Gaithersburg, MD 20899

RE: <u>NATIONAL STRATEGIES FOR TRUSTED IDENTITIES IN CYBERSPACE or NSTIC</u>

Dear Ms. Sokol,

Thank you for fielding public comment on the National Strategy for Trusted Identity in Cyberspace. Public comment is a vital part of American civics and plays a great role in providing balance to national policy.

The NSTIC program has shown some promising aspects, but I really feel the program is inequitably tilted towards the exploitation of the Internet user and their identity as a de facto capital for basic things like, energy and banking. I feel these are areas which already are pressing the borders of human rights abuses by way of identity.

I suspect many of my comments may be mirrored by other privacy and identity advocates in the spectrum of considerations. So I intend to be brief.

Of course, it is less personal if a corporate computer doesn't like your identity and won't let you pay your electric bill, driving down your credit and making daily living more expensive and difficult. This has become a form of casual, obscure, socially passable individual ensnarement in finance. Banking industries are over indulgent with "know-your-customer" policies. We experience such circumstances daily today, but I believe NSTIC will exacerbate and encourage these types of problems to the lopsided benefit of the commerce industry.

I also want to address and acknowledges an overextended principle of Internet capitalization: "If you're not paying, then you are the product." There is a rather blithe way with NSTIC to blend this principle with a universal voluntary-compulsory identity gate system of commerce authentication.

In this sense NSTIC is not yet the departure from the impacts of a national identity system. Human identity as a stock commodity or token to get through multiplying gate networks is one way to increase the prospect of identity becoming a currency. The identified person loses control and the control is handed to the gate handler.   In the end, no amount of authentication will ever be enough, if you can be singled out.

There is a falsehood present in the NSTIC proposal. You cannot both be anonymous and proved to be you. The computers know things about us, before we get there. If they don't now- they will because they have proven they can in recent past. So there is no insurance that I won't be rejected from online service discrimination if the computer has been told to reject an anticipated profile of my demographic dataset, based on my identity traffic and user history.

More of this will inevitably lead to the commodification of identity. Put bluntly, user identity bundles becoming a NYSE exchange based on port adoption won't be far off in the future. That unfortunately is slavery and it is still illegal in the US.

Anything with this much nefarious potential poses dangers not just isolated to the United States, but these standards will be imposed to Internet users abroad.

For these reasons, long term affects of NSTIC I believe would ultimately be a discouraging prospect for Internet users and the freedoms they enjoy today.

Please reconsider the NSTIC program for an Interagency security use within the walls of the government sector as policy. It simply isn't a very appropriate amenity for mainstream civilian living.   It has a place and a market, but it should be appropriated to places where surreptitious demand for ID is required already.

NSTIC will face a lot of opposition for coaching this society to upsurge identity requirements for absolutely everything they do for the sake of commerce.

Best,

Sheila Dean
511Campaign.org