

Morpheus Technologies Inc.
Response to Models for a Governance Structure for the National
Strategy for Trusted Identities in Cyberspace.
Notice of Inquiry Docket # 110524296-1289-02

To: Mr. Patrick Gallagher
Department of Commerce
Office of the Secretary
U.S. Department of Commerce and National Institute of
Standards and Technology

Response to section 3.0 Representation of Stakeholders

- 3.1 We believe the steering group of the Stake Holders ~~is a way to~~ must allow the firms, institutions and individuals who will actually design, build, operate and regulate the Identity Ecosystem to influence the final and ongoing solution. The steering group of the stakeholders should include those who have either ~~be based on~~ technology focus ~~and or~~ a policy focus, thereby ensuring that ~~allowing for~~ the technology solutions ~~to~~ align with policy and regulatory requirements established by NSTIC.
- 3.2 For business entities through trade organizations; for non business entities through policy groups.
- 3.3 The best example from the conference was the Smart Grid program. The underlying rules of the stakeholders steering group should ~~balance~~ resemble this program.
- 3.4 Ultimately the users of this new security solution must be willing to pay not only the direct cost, but also the cost of this regulation and management of the program. Therefore cost to willing participants in the stakeholders steering group should be minimal.
- 3.5 We ~~believe that~~ propose a shared security solution where identity providers and Identity users pay a fee back to the regulatory body as a small % of the transaction fees. This organization and mechanism constitute what we call the "Identity Exchange". The ~~is~~ Identity Exchange would also include over time, new identity solutions, example such as Identity Ownership, Authentications of Identity and Authorization of Identity. There are many new ways that identity can be addressed that are superior to today's methods. We have provided additional information following this response.

3.6 Members of the stakeholders steering group should be equal with respect to voting.

3.7 Broad representation will come from the groups that are created for the stakeholders steering group. There is a real need for representation by both Federal and State Government in NSTIC.

Morpheus Technologies Inc, Background and Company Focus

There is a growing need for a convenient, secure and economical method for the secure interface of individuals when they interact with a secure network system or multiple secure devices, what we call the “Human to Machine Security Interface”. Passwords, security cards, guards, physical barriers, and the occasional biometric reader currently make up the backbone of our security system. However, no single measure routinely works across all systems or throughout a single or multiple organizations.

~~Biometrics have long been thought to be a solution but have been implemented on a limited basis oriented to the institution using biometrics, not the individual who is providing them.~~

Biometrics rely on physical attributes and does hold the promise of being simple, and cost-effective interface key that is always available. At Morpheus we believe that with a change in the orientation to the individual, the potential of a broad based security interface can be developed that improves security for everyone.

As has been shown in numerous studies of biometrics, the use of more than one biometric provides secure identities or authorizations beyond anything current use as a single component of identity systems. Similarly, the use of additional identity requirements such as passwords, digital certificates or other physical mechanisms can be integrated with biometrics into a complete system.

Enabling the Individual - The Interface Key

The Morpheus Technologies solution simplifies the use of biometrics by offering its clients enrollment and a secure distribution system of biometric derivatives for individuals. These biometric derivatives or *templates* are ~~your~~ a coded “identity” and the key to implementing the simple, cost effective, and always-available identity profile for the “Human to Machine (H2M) Security Interface.” This process is also compatible with the White House’s recently announced “National Strategy for Trusted Identities in Cyberspace (NSTIC)”

The Morpheus solution allows the We-creation of an individual’s unique identity profile. This profile is available on demand for each security application where our clients provide -an individual access. This allows you arrangement enables the -to distribution of -the identity profiles to every machine and network security structures in ~~your~~the NSTIC system – from laptops to building entry. The individual has now been enabled and can safely and securely

interfere with or to your a given system.

Once enrolled, MORPHEUS makes it possible for the individual to use his or her biometric identity profile anywhere -- from getting cash at the ATM, to checking out library books to boarding a plane. In short, biometric images are owned by the enrolled individual "Identity Ownership" and their biometric derivatives are incorporated into their "Identity Profile" which are licensed by Morpheus for exchange to participating institutions approved by the enrolled individual. In addition to work, participating institutions can include financial institutions, insurance providers, health-care providers, along with many other organizations This ability to provide secure and appropriate authentication on demand is fully consistent with the goals of the NSTIC program. We are working closely with security equipment and system vendors on how to use and capitalize on the potential of the future where the individual is enabled to be securely authenticated on demand.

The Morpheus Biometric Data Exchange (BDX) is the proprietary system for producing and exchanging biometric identity profiles. We would consider making this available as a reference model for the NSTIC program.

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The MORPHEUS Identity Solution of enabling the individual is clearly a superior solution over the one-by-one process used by cumbersome paper and password security systems currently on the market.

Alignment of the Morpheus with the White House National Strategy for Trusted Identities in Cyberspace June 1, 2011

The mission:

There is an alignment of the primary design elements of the Morpheus Technologies solution for identity ownership and identity exchange with the White House's recently released National Strategy for Trusted Identities in Cyberspace. In reviewing ~~the~~ is ~~NSTIC-new~~ strategy, it is clear that the individual is the primary focus for security protection - with an individual concentric security solution rather than an organizational concentric security solution, (page 6 in the WH document). The following outline will identify where Morpheus is positioned, and how we can present our solution as it relates to this strategy. The goal will be to use have the Morpheus Identity Ownership and Exchange to be an existing model of a system that is fully compliant with the components of "The Identity Ecosystem" outlined in the White House strategy.

Morpheus as an Identity Provider (IDP):

Morpheus is an Identity provider as outlined in “The Identity Ecosystem” page 21 in the WH document. The Morpheus ~~solution by design~~ already provides the elements outlined for establishing, maintaining and securing the digital identity of the individual through the process we define as “Identity Ownership” and for the revoking, suspending and restoring the individual’s identity through the process we define as “Identity Exchange”.

Morpheus is Privacy Enhancing:

Morpheus meets all aspects of privacy practices as outlined on page 11 in the WH document under “The Fair Information Practice Principles (FIPP)”. The Morpheus Biometric Data Exchange (BDX) provides the 8 FIPP’s transparency, individual participation, purpose specification, data minimization, use limitation, data quality and integrity, security, and accountability and auditing.

Morpheus is Secure and Resilient:

The Morpheus BDX is a secure and resilient design specifically designed to ensure the confidentiality, integrity, and the availability of an identity and when appropriate non-repudiation of identity based transactions, page 12 in the WH document.

Morpheus is designed to be Interoperable:

The Morpheus Biometric Data Exchange (BDX) is designed to be interoperable with all other security solutions that follow FIPP, page 13 in the WH document. The Morpheus Identity Profile that is produced by the BDX is designed to work with many authentication systems using renewable biometric templates and the credentialing specifics needed by the security provider. That could be a company for employee security, a bank, an insurance company or many other organizations that will move to improved authentication in the future.

Morpheus is the Cost Effective and Easy to Use:

Morpheus can be the basis for a ~~is the~~ cost effective and self-sustaining solution because we focus on singular enrollment and identity exchange through the Morpheus BDX. The clients who will use the Morpheus solution will save money as enrollment cost are shared by all the participating entities. Clients who have the cost of enrolling individuals can recover that cost as the individual shares their identity through the Morpheus BDX and part of the cost charged to the participating client for sharing goes back to the enrolling client. Easy to use,

biometric authentication has been proven to be convenient and fast. See page 14 in the WH document.



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