Mehta Ketan

From: Rothstein, Ron [RRothstein@anteon.com]

Sent: Thursday, December 23, 2004 3:59 PM

To: DraftFips201@nist.gov

Subject: Comments on Public Draft FIPS 201

Gentlemen,

The comments below relate to FIPS PUB 201, Federal Information Processing Standards Publication (Version 1.0):

Section 2.2.1, Page 6
"The Registration Authority shall visually inspect the identification documents and authenticate them as being acceptable".

Recommendation: Visual inspection is NOT adequate. The standard should require machine validation that the documentation is authentic (whenever possible). For example, must read and confirm the driver license 2D barcode to insure it was authentically issued. Or confirm that the license serial number was issued by the state to this individual.

Section 4.1.1, Printed Material:
The "printing shall not rub off … on the plastic card printer rollers during printing and laminating" implies a dye-sublimation or re-transfer print on the card.

Recommendation: Change the wording so that laser marked cards are acceptable and encouraged. Laser marked cards have proven to be the most durable and counterfeit resistant method of placing text, photos, and security features (such as tactile feel) on credentials.

Section 4.1.3.b.
"The card body shall be PVC core with PET layers or similar card materials…"

Recommendation: Change wording to allow the use of laser markable layers in the card body.

Section 4.1.4, Topography Requirements:
Section 4.1.4.1.a. Zone 1 – Photograph
Section 4.1.4.2 Back of the Card
Zones of the card are illustrated that are very close to or at the edge of the card. Typically, printers have difficulty printing reliably close to the edges of the card due to card edge deformations and other factors. Printing near or at the edge of the card increases the reject rate and subsequently the cost of issuing cards.

Recommendation: Change the card layout so that printing is at least 2.0mm from the edge of the card.

Section 4.4.1 Topography Requirements
For many applications, the credential will be used only as a "flash pass"

Recommendation: The card topography should allow for an optical memory stripe on the card since the optical memory stripe is more counterfeit resistant than any other card feature as a "flash pass" and also provides a means to read data from the card when needed.

Please contact me if you have any comments or questions.

Sincerely,

Ron.

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