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Cmt #	Org	Point of Contact	Comment Type	Section,Annex, etc and Page Nbr	Comment (Include rationale for comment)	Proposed change
1	BAI	Kozlay	1T	FIPS201, 4.1.4.3e&f	To prevent the exclusion of newly-available on-card biometric technology	The placement of an optional biometric sensor should not be prevented in information Zones 10
2	BAI	Kozlay	1T	6.1	To enable the use of new PICS-like PACS High Assurance contactless biometric cards	"For privacy reasons, contactless *transmission* of PIN's and Biometrics is not supported."
3	BAI	Kozlay	1T	6.2.2, Table 6-1, p.56	To enable high security PACS High Assurance Profile with biometric smartcards	A PIN *or biometric* is collected from the cardholder.
4	BAI	Kozlay	1T	4.3	Ensure cryptographic security and interoperability	Add a requirement that both the cryptographic algorithms and methods be in accordance with NIST approved standards.
5	BAI	Kozlay	1T	5.3.2.3.1, p.44	To provide a mechanism by which a reader or system can determine the biometric functionality of the card	Add a field (BIO_FUNCTIONALITY) to the attribute certificate which specifies the biometric functionality of the card to which it is associated. The proposed value is a **bitmask** of the values described below:
					For cards with no matching capabilities, only biometric template storage	BIO_MATCH_OFF_CARD = 1 The card can provide reference templates for external comparison.
					For cards with on-board matching capabilities and biometric storage, but no on-board sensor	BIO_MATCH_ON_CARD = 2 The card can perform template matching on provided templates against internally stored reference templates.
					For cards with on-board sensor and matching capabilities as well as biometric storage	BIO_FULL_ON_CARD = 4 The card can autonomously complete biometric authentication.
6	BAI	Kozlay	2T	SP800-73, 4.1 p.22	To extend Access Control Rules to facilitate biometric cardholder-to-card authentication as described in FIPS PUB 201	In addition to the existing defined Access Control Rules for containers and crypto functions, 3 RFU Access Control Rules should be defined as described below:
						BSI_ACR_BIO = 0x0D: Biometrics must be satisfied
						BSI_ACR_BIO_OR_PIN = 0x0E: Biometrics OR PIN must be satisfied
						BSI_ACR_BIO_AND_PIN = 0x0F: Biometrics AND PIN must be satisfied

D = Document,1 = FIPS201, 2 = SP800-73
T=Type of Comment, E = editoral, T = technical