INFORMATION SECURITY AND PRIVACY ADVISORY BOARD

Established by the Computer Security Act of 1987
[Amended by the Federal Information Security Management Act of 2002]

The Honorable Karen Evans
Administrator for Electronic Government and
Information Technology
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Ms. Evans:

I am writing to you as the Chair of the Information Security and Privacy Advisory Board
(ISPAB). The ISPAB was originally created by the Computer Security Act of 1987 (P.L. 100-
35) as the Computer System Security and Privacy Advisory Board, and amended by Public Law
107-347, The E-Government Act of 2002, Title III, The Federal Information Security
Management Act of 2002. One of the statutory objectives of the Board is to identify emerging
managerial, technical, administrative, and physical safeguard issues relative to information
security and privacy.

During its public meeting on June 6-7, 2007, ISPAB drafted and approved a recommendation to
send a letter to OMB with a copy to the Department of Homeland Security (DHS) regarding the
ISPAB's concept of the issues and views on the Real ID program's use of encryption.

The DHS has asked for comment regarding whether the costs of encrypting data in the machine-
readable zone outweigh the benefits to privacy. The DHS Data Privacy and Integrity Advisory
Board (DPIAC) has raised important issues regarding security standards and privacy safeguards
needed for proper implementation of the Real ID Act. In addition to the views expressed by the
DPIAC, it is the view of the ISPAB that because of the comparatively greater ease of casual
capture and storage of such information without the authorization of the card owner, encrypting
personally identifiable information (PII) stored in the machine-readable zone has considerable
benefit for privacy, regardless of whether that information is available in human-readable form
on the face of the card. We recognize that key management issues may present costs and
technical challenges in implementation; however, we believe that the benefits of encryption
justify its use. Accordingly, while some PII in the machine-readable zone such as name may be
broadly accessible for ease of use, regulations developed under the Real ID act should require
the use of encryption in the machine-readable zone for that PII which should normally not be
captured and retained by entities that come into casual contact with the card.

The ISPAB appreciates the opportunity to add views on these important regulations and will continue to follow the development of the Real ID program with great interest.

Sincerely,

Dan Chenok
Chairperson
Information Security and Privacy Advisory Board

cc.: Mr. Jim Nussle, Director, The Office of Management and Budget
    Mr. Greg Pinto, Acting Director, Regulatory Policy, DHS
    Ms. Susan E. Dudley, Administrator, Office of Information and Regulatory Affairs, OMB