

From: Kantara Initiative – Identity Assurance Working Group members

To: NIST SP 800-63 managers/authors/editors

Re: Request for NIST to review and action Kantara Initiative's interpretation of NIST SP 800-

63 rev.3 requirements

Kantara Initiative (KI) has established a distinct Class of Approval for service providers who wish to gain an independent attestation that their service conforms to the requirements of SP 800-63 rev.3. These services are assessed against a comprehensive suite of Service Assessment Criteria (SAC) that KI has derived from all imperative (i.e. those directly stating a 'SHALL' requirement) statements in both SP 800-63 A and '-63B at IAL2/AAL2 ('-63-3 is informative and KI members have chosen not to address '63-C thus far). Development of these SAC involved extensive investment of time by SME practitioners in the field - service providers, assessors, criteria authors/editors/reviewers.

Out of this work KI identified a number of instances where interpretation of SP 800-63 rev.3 requirements have proven to be challenging. In response to these challenges, KI members developed the five accompanying Implementation Guidance Reports. Each of these reports states a problem and proposes a recommendation. It should be noted that, in the interests of progressing adoption and encouraging provision of services which meet the requirements of SP 800-63 rev.3, KI has adopted and is already applying these recommendations. Since our reports refer to them, we have also provided a copy of KI's applicable SACs. It should be noted that these SAC are restricted to Kantara Initiative Members only. As such, NIST should not use or distribute these SAC beyond the use intended and authorized by this memo without prior authorization by KI.

By this memorandum KI is requesting that in a timely manner NIST staff review these reports and provide feedback as to the correctness of KI's interpretation and therefore of our recommended action(s). KI would appreciate advice from NIST as to how it intends to respond to these reports. It is KI's opinion that NIST's response, by means of errata or other interpretations, could provide formal guidance to the community at large.

Should you wish, KI is available to discuss these reports, or to review your responses.

Yours sincerely

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