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NIST Response on 800-63-3 for your consideration

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Thu, Oct 3, 2019 at 12:38 PM

To: Ken Dagg <kendaggtbs@gmail.com>

Cc: "Quint, Roger" <Roger.Quint@unisys.com>, Richard Wilsher <RGW@zygma.biz>, Ruth Puente <ruth@kantarainitiative.org>, martin.smith@acm.org

I'll respond in email rather than create yet another draft. Overall no objection to forwarding to the IAWG.

A few comments:

1. As David says, NIST is required to stick to the script, and can't tell agencies how to interpret it. I think the requirement for authoritative source verification of DL information is intentional. Regarding RGW's comments, while Richard is correct, I'm not sure NIST is obligated to care whether the requirement can be achieved or not.
2. Likewise, the intention to not allow KBV seems very intentional.
3. In general, the response is full of the same language as the standard, which is to say expressing requirements without a threshold of verification of the requirements. To pull an example at random "Tamper detect the DL" is cited in the letter, but the standard to which that must be done is not stated. As good as a trained human eye? Better? Do you use the UV spectrum? And why are we tamper detecting if the information is actually being verified against authoritative sources? But I digress.

No other comments, really.

Best to all,
Scott

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