Submitted by: _____

Date: _____

Cmt #	**Organization**	**Point of Contact**	**Comment Type (G-General, E-Editorial, T-Technical)**	**Section, Annex, etc and Page Nbr**	**Comment(Include rationale for comment)**
1	SAIC	Bernie Krauss	D1 E	Sec 3 page 10	Specifying a form factor for all environments does not present the best solution for establishing a standard. Form factors in the marketplace like USB tokens and Compact Flash adapters for moble devices are widely ued in the marketplace today and do not require modifications to the device or additional hardware components. The proposed card form factor card only solution does not address many physical and logical security issues. Tt FIPS 201 should dictate logical messaging structures to help aid in interroperability for various forms of a PIV's that may evolve with time
	SAIC	Bernie Krauss	D1 E		How will this new standard interoperate with current standards that now provide guidance today? Will the new standard eliminate the current standards?

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

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	SAIC	Bernie Krauss	D2 E		SP 800-73 is a radical upgrade to smart card standards. This will force card manufactures and integrators to spend significant amounts of resources to provide this intergraded circuit card environment. This card already has a carve out for certain organizations whereby the requirements are not compatible for certain reasons. Should a file-based system card or similar implimentation prove restricted and flawed over time, there are no existing mechanisms to account for such event without revisiting this specification. Logic Level architecture should be seperate from the actual implimentation in hardware. Variable security levels and models will not all fit in the current specification which is so specific to one PIV. New innovations and better security mechanisms will be stiffled if this is the only specification utilized for PIV compliance.

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Proposed change
the PIV should be based on interoperability of a messaging standard, not the combination of specific physical and logical standard combined as one. Language should extend the PIV to allow for various form factors that can communicate using standards being proferred in the specification. hardware Interfaces should not be specific to the Smart Card inteface, as others may become as important for certain applications (like mobile authentication devices). The standard should for the PIV should include, but not be limited to a smart-card form-factor, but may take on other forms and interfaces with standards complient features.
Standards should allow variety that can support growth and development of the technology, as well as competition in the industry

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Proposed change
A proposed change would be utilize SP 800-73 as a base-line, without the physical form factor being locked in. SP 800-73 should be one of specifications utilized, not the only. It is more important to gain an interoperable messaging architecture in this standard such that credentials can be properly issued, managed and validated.

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