

In

---

From: "Farrar, Perry" <perry.farrar@lmco.com>  
Subject: Comments on FIPS PUB 201  
To: DraftFips201@nist.gov

<<NISTCommentTemplate.xls>>

-- Perry Farrar; perry.farrar@lmco.com  
-- Phone: 1-301-640-4209; Fax: 1-301-640-4750  
-- INFOSEC Solutions and Services  
-- Lockheed Martin Corporation



NISTCommentTemplate.xls



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	Lockheed Martin	Perry Farrar	G	PIPS PUB 201 Section 5	At the 18 Nov industry day it was indicated that the standard provides for separation of duties to ensure the integrity of the process. It is not clear to me, however, that the standard provides more than separate descriptions of duties--without prohibiting the same individual or office to perform all of them.
2	Lockheed Martin	Perry Farrar	G	FIPS PUB 201 Section 5	I think it needs more controls to assure a card has correct data. What prevents bribing someone in an issuing office: "I need a valid ID with my biometrics and the name Ben Franklin. Don't run my fingerprints and just pretend I had a background check; I don't want either to really happen." I'm not sure I agree with Judith Spencer (GSA) that one level of assurance is always suitable. Maybe different levels of assurance are appropriate. Why choose one assurance level that is overkill (\$\$\$!) for some and inadequate for others? Is assurance of contractors the same as for employees? Is assurance of current employees the same as for new ones? Needs for identity assurance and background checks may correlate sometimes but maybe not always. I suggest a field specifying the identity assurance provided--independent of the suitability field set based on background checks. You can push assurance rules out to an SP and call your current processes level "1", then add other levels as you work them out. This could also help when identity certification rules change.
3	Lockheed Martin	Perry Farrar	E	FIPS PUB 201 Announcement, p. 3	Subsection 3, second paragraph, third line. Don't need two periods at the end of the sentence.