

Cmt #	Organization	Comment Type (G-General, E-Editorial, T-Technical)	Section,Annex,etc and Page Nbr	Comment(Include rationale for comment)
1	USDA	E	Section 5.2.3.1 (page 43)	As part of the first sentence in 5.2.3.1 add a statement similar to "or participate in an agency PKI crossed certified with the FBCA at a medium or high level."
2	USDA	G	Section 2.2 (pages 4-5)	PIV Requesting Official and PIV authorizing Official - Do these individuals have to know or have contact with the Applicant?

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3	USDA	G	Section 2.2 (pages 4-5)	Registration Authority - may not be the individual that performs a background check or needs to know the outcome - this may be done by HR.
4	USDA	G	Section 2.2.1 Second Paragraph (page 5)	Why does the Requesting Official have to make copies of the identity source documents to be forwarded to the Registration Authority when the RA is doing the identify proofing? - If this is somehow to prevent foul play it should be explained.

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5	USDA	G	Overall Section 2.2 (pages 4-7)	Why is identify proofing being tied to background checks? Suggest that the Federal government have a set of criteria for proving identity (which may include some level of background check) for employment and that higher level background checks are the purview agency management. This background information may be stored on a PIV card but should not be necessary for identity proofing. A persons need for a clearance changes throughout their career. If a clearance is needed for a newly hired employee it should not be part of the identity proofing but a stipulation of employment.
6	USDA	G	Section 2.3 (pages 7-8)	Identity Credential Issuance - the process described is very decentralized and will require hundreds of card issuance stations for USDA. Suggest the ability to have a centralized model where personalized applicant information is digitally signed and encrypted and sent electronically to a mass production facility. The cards would be produced with the Applicant's personalized information, card inventory would be updated and the cards would be securely sent to a designated official for proper distribution.

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7	USDA	G	Section 3.2.2 (page 12)	Applicant Responsibilities - last bullet - explain "provide biometric as needed"
8	USDA	G	Section 3.3.2 (pages 14-15)	PIV Card Issuance and Management Subsystem. This section explains Key Management but does not explain what is required for a Card Management System - how is a change of custody proven for a card that contains an Applicant's private key - need to prove that a card was not tampered with through its full life cycle.

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9	USDA	G	Section 3.4 (page 15)	Why are the activities that take place during fabrication and pre-personalization at the manufactures not considered part of the life cycle model? The life cycle needs to show that the PIV card was always in the possession of a trusted entity and that it could not have been tampered with.
10	USDA	G	Section 4.1.6.2 (page 24)	Activation by Card Management System. PIV cards MAY support card activation by the card management system... Why is this not required?

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11	USDA	G	Section 2.2.1 (pages 5-6)	This version of FIPS 201 considers Identity Proofing and Background Check to be the same thing. This will cause significant lag time for many users as it creates a delay in the process. Instead, there should be one standard requirement for issuance of a badge (e.g. Advanced NAC). Users who require more detailed background checks will just have to wait to receive any access permissions for facilities and/or systems that require the check.
12	USDA	G	Section 2.2.1 (pages 5-6)	Position sensitivity levels and required Background checks should be clarified with OPM. This should also be separated into another section or perhaps even a separate document and not be part of the PIV issuance process.

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13	USDA	G	Section 2.2 (pages 4-5)	There are a significant numbers of roles required here. Could the Applicant initiate the request? Or perhaps the registration authority could Authorize.
14	USDA	G	Section 2.2.1 (page 7)	It is probably more likely that the background check information would be maintained in Personnel Security, not with the Registration Authority.

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15	USDA	G	Section 2.2.1 (pages 5-7)	Can the Registration Authority maintain electronic copies of the PIV request, identity source documents, etc.
16	USDA	G	Section 2.2.3 (page 7)	Please clarify "...treated according to visitor procedures."

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17	USDA	G	Section 4.1.4.3.f (page 22)	Agency Seal should be one of a defined set of Agencies (e.g. Cabinet level Depts and independent agencies) for ease of recognition.
18	USDA	G	Section 5.2.4.1 (page 46)	Renewal Process should begin prior to Expiration of the current PIV card.

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19	USDA	E	Figure 3-1 (page 13)	Arrow should be added from Physical and Logical back to Certificate Status Responder.
1	AMS/SSO/PS T	G	Tables 2-1, Pg 6	The numbering under Position Sensitivity Level should correspond with the widely accepted numbers assigned to the various levels.
2		G	Table 2-2, Pg 6	"SAME AS ABOVE"
3		G	2nd para & caption in Table 2-2, Pg 6	The use of "background check" is inappropriate for the investigations identified. These are Personnel Security Investigations.

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4		G	NA	The introduction of the PIV crosses several administrative boundaries currently in effect. Identification Cards traditionally fall under the purview of Human Resources, whereas Badging and Access Control falls under Security. Add the cryptographic aspect and facilities with multiple Federal Agencies and you've created an administrative and security nightmare. Who will have operational control and responsibility for this program?
			FIPS 201	
1	USDA/NFC Cyber Security	E	Part 1: PIV-I, 2.2.3, pg 7	long-tem (mis-spelled)
2	USDA/NFC Cyber Security	E	Part 2: PIV-II, 3.3.2, pg 15	This Key Management componet are used... (grammer)
3	USDA/NFC Cyber Security	G	Part 2: PIV-II, 4.1.4 , pg 20	(Additional security feature)
4	USDA/NFC Cyber Security	E	Part 2: PIV-II, 5.2.1.2, pg 42	A similar application and approval process...for current employees expect that... (wrong word "expect")

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5	USDA/NFC Cyber Security	G	Part 2: PIV-II, 5.2.2, pg 43	(Question - If Issuing Authority generates a PIN for the applicant, can the applicant change the PIN later?)
6	USDA/NFC Cyber Security	E	Part 2: PIV-II, 5.2.3.2.1, pg 44	URI not defined
7	USDA/NFC Cyber Security	E	Part 2: PIV-II, 5.2.4, pg 46	The cardholder may retire, change jobs,...previously accurate card. (wrong word "accurate")
8	USDA/NFC Cyber Security	E	Part 2: PIV-II, 6.1, pg 49	For privacy reasons, contactless use of PINs and biometrics is not supportedPINs and... (sentence runs into next sentence)
9	USDA/NFC Cyber Security	G	Part 2: PIV-II, 6.1.1, pg 50	(Visual identification determines PIV card has not be tampered with)
			SP 800-73	
10	USDA/NFC Cyber Security	E	3.3.2, pg 18	A security status indicator is said to be an application security status indicator if it is reset the currently... (missing word "when")
11	USDA/NFC Cyber Security	E	3.3.3, pg 18	According to an access control rule, ... the security condition values to TRUE. (wrong word "to")

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12	USDA/NFC Cyber Security	E	3.4, pg 19	Table 3-1 ; The root of a file system could be a constructed BER-TLV data object in which case. (wrong word "which")
13	USDA/NFC Cyber Security	E	3.4.1, pg 19	Encryption, cryptographic checksums... in the communcation connetion between... (mis-spelled word "connetion")
14	USDA/NFC Cyber Security	E	6.4.8, pg 77	The PERFORM SECURITY OPERTION command... (mis-spelled word "OPERTION")
15	USDA/NFC Cyber Security	E	7, pg 82	The application identifiers of these card applications for interoperable use are given in Table xx. (Table xx)

Proposed change

Proposed change

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Position Sensitive levels and their numerical designations are: 1: Nonsensitive; Form SF 85; 2: NonCritical Sensitive; Form SF 86; 3: Critical Sensitive; Form SF 86; 4: Special Sensitive; Form SF 86; 5: Moderate, Form SF 85P; 6: High; Form SF 85P
Add investigative requirement for #4: Special Sensitive, Single Scope Background Investigation, SSBI
Replace background checks with Personnel Security Investigations

Proposed change
That the Branch or Section with operational and administrative responsibilities for the implementation and maintenance of this program be identified. That guidance be provided on how to handle facilities with multiple Federal agencies.
long-term
This Key Management component is used...
Suggestion to include holographic image of Agency Seal to back of card near Agency Card Serial
A similar application and approval process...for current employees except that...

Proposed change
Provide full description of URI
The cardholder may retire, change jobs,...previously active card.
For privacy reasons, contactless use of PINs and biometrics is not supported. PINs and...
Suggestion to include holographic image of Agency Seal would add another feature to verify against
A security status indicator is said to be an application security status indicator if it is reset when the currently...
According to an access control rule, ... the security condition values are TRUE.

Proposed change
Table 3-1 ; The root of a file system could be a constructed BER-TLV data object in each case.
Encryption, cryptographic checksums... in the communcation connection between...
The PERFORM SECURITY OPERATION command...
The application identifiers of these card applications for interoperable use are given in Table 7-1.