

Cmt #	Organization Tennessee Valley Authority	Point of Contact	Comment Type (G- General, E-	Section, Annex, etc., and Page Nbr	Comment (Include rationale for comment)	Proposed change
1	TVA	TVAP*	E	D1, Abstract Title, p. iv	The heading reverses the words "standards" and "processing"	"Federal Information <u>Processing Standards</u> 201"
2		TVAP	G	D1, Abstract, Section 9, p. v	The bifurcation of responsibilities between NIST and OMB for the implementation of HSPD-12 could undermine cost effective implementation of this standard. We understand that NIST will establish the criteria that agencies are to apply, but OMB is tasked with developing guidance for transitioning between PIV-I and PIV-II. If the standard, including the issuance of new smart badges, has to be fully implemented in the first phase, (PIV-I), it is unclear why OMB guidance is needed and what it would apply to. If it is intended to have some substantive effect, and this seems to be the intention, there is a real risk that funds could be expended on materials that later are determined not to conform to the forthcoming OMB guidance. Even if OMB aligned its efforts with the schedule for PIV-I, it still will be virtually impossible to fully implement PIV-I requirements on the mandated schedule. Doing this will require updating internal agency processes, completing the proofing and identification of employees and contractors, including, possibly National	NIST needs to consider two changes. At a minimum, the following should be added to this section: "Agencies shall meet the requirements of PIV-I <u>to the maximum extent practicable.</u> " Second, the first implementation phase with compliance due by October 2005 should not include issuance of the smart badges and the installation of associated equipment . At most, it should include identity proofing and registration and even completing this task by October of this year will be very difficult. This would allow specifications to be finalized and better ensure that the badges and associated equipment acquired by agencies conform to the final specifications and any OMB transition guidance. It would also partially alleviate the serious budget problem. We think both of these changes would be fully consistent with HSPD-12.

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Cont.					<p>Checks (NACs), installing necessary card readers, and issuing the specified credentials (smart badges). Since detailed specifications have yet to be finalized, we question whether suppliers of compliant badges and associated systems will be able to meet the schedule. Even if suppliers purport to be able to do this, agencies will have insufficient time to evaluate the merits of competing proposals from suppliers, assuming there are multiple suppliers. There is also the serious budget problem. FIPS 201 mandates agencies complete significant activities this budget year, but budgets have already been set for this year and these activities have not been included. Even if OMB is able to supplement agency budgets to cover these activities that would not help TVA which receives no federal appropriations or other agencies who may be in the same situation.</p>	
3		TVAP	G	D1, Section 1.3, p 2	<p>Section 1.3. describes Sections 2 and 5 as “normative,” meaning that compliance with both is required. Both contain overlapping requirements and substantively similar information, particularly regarding identity proofing and registration. However, Section 2 sets forth phase 1 requirements and Section 5 is part of phase 2 requirements. We assume that Section 5 is intended to be a more detailed discussion of the phase 1 processes, but this needs to be clarified. This overlap adds further emphasis to TVA's Comment No. 2 and suggests a need for better explanation of the relationship between and schedule for implementing PIV-I and PIV-II.</p>	<p>The relationship between and schedules for Sections 2 and 5 needs to be addressed</p>

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4		TVAP	E/G	D1, Part 1: PIV-I, p. 3	See TVA Comment No. 2. It will be virtually impossible to update processes, complete identity proofing and registration, issue new credentials and install associated equipment by the October 2005 date. Our experience has been that NACs take a long time to complete, and we understand there is a significant backlog on requests now. NIST should limit PIV-I to identify proofing and registration. Even completing this by the October date will be very difficult if NACs are a mandatory requirement for identify proofing and registration.	The following should be substituted for the last sentence on page 3, the cover page for PIV-I: "Implementation Timeframe: In accordance with HSPD-12, agencies shall meet the requirements of this part no later than October 2005, to the maximum extent practicable."
5		TVAP	T	D1, Section 2.2, p 4.	Section 2.2 appears not to allow an individual more than one role in the identity proofing and registration process. There could be situations where this process is too restrictive.	Allow an individual to hold more than one role or allow agencies to define who fills roles.
6		TVAP	G	D1, Section 2.2.1, p 5	Extending FIPS 201 requirements to all contractors is going to be very difficult and may actually undermine the objective of the proposed standard, increasing agency security. Agencies employ a variety of different contractors on short- and long-term bases. TVA, for example, employs large numbers of un-skilled and skilled labor to assist in the maintenance and repair of its power plants during limited outage periods. When generating units suddenly fail (called a forced outage), labor must be hired and deployed very quickly, within hours or a day or two at most. Applying the same identity proofing and registration processes to these individuals is simply not possible. It has been our experience that NACs by the Office of Personnel Management literally take months to complete. (For this reason, TVA has ceased doing NACs on most of its employees and uses other methods for identity proofing.) Moreover, because these individuals are employed on a temporary basis, are not always directly employed by TVA itself (but rather by companies	The standard format needs to provide some flexibility to meet individual agency needs, particularly in identifying and extending its requirements to agency "contractors."

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Cont.					that contract with TVA to perform services), and they are often transitory, moving from one plant and one location/area to another, recovering credentials that may be issued to them (smart badges) will be difficult. Some number of issued credentials will not be recovered and security could actually be undermined as the number of un-recovered badges grows. The standard carefully and appropriately preserves to each agency decisions about who should be granted access to facilities and systems. The standard should likewise note that agencies also retain discretion as to who to treat as a "contractor" for purposes of issuing credentials and FIPS 201.	
7		TVAP	G	D1, Table 2-2, p 6	Minimum uniform criteria for identity proofing are an appropriate and necessary part of the proposed standard. However, the emphasis should be on the minimum number of criteria necessary and agencies should have as much flexibility as possible to conform their activities to the identified criteria. One criterion that TVA finds especially problematic is the use of National Agency Checks for positions designated moderate, high, and critical. NACs take an inordinate amount of time and are not compatible with the more business-like activities of agencies such as TVA. We largely have dispensed with NACs because of this. TVA urges NIST to make this an optional requirement or limit it to positions designated high or, preferably, only critical. At a minimum, NIST should ascertain how long NACs take on the average and what OPM plans to do to address the influx of additional requests that could result from FIPS 201 in a very short time period.	TVA urges NIST to make NACs an optional requirement or limit it to positions designated high or critical. At a minimum, NIST should ascertain how long NACs take on the average and what OPM plans to do to address the influx of additional requests that could result from FIPS 201 in a very short time period. The standard should be written to accord agencies as much flexibility as possible to conform existing identity proofing processes to minimum requirements established by the standard.

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8		TVAP	T	D1, Section 2.2.1, p. 6	An applicant basically is required to appear in person with identification documents three times in the course of identification proofing, registration, and the issuance of credentials. This will be time consuming and potentially costly and needs to be reconsidered. TVA has a centralized background investigation staff at one location that covers employees and contractors in an 80,000 square mile area spanning parts of seven states. The number of face to face meetings needs to be reduced to the minimum possible number.	The standard should tailor the credential issuance process to the type of sensitivity level with fewer checks required for low and moderate positions. It should be sufficient for the Requesting Official to visually confirm that an applicant is the individual that appears on the required forms of identification. If those forms do not contain pictures, the Requesting Official should be tasked with photographing an applicant and the photo should accompany the documentation through the rest of the process. Ideally, the Issuing Authority should issue identity credentials to applicants by sending them directly to the Requesting Official (the person most likely to be at or near the location at which the an applicant will be employed) who would in turn issue the credentials to the applicant after verifying that the applicant matches the photograph or form of identification that has a photograph. If this is unacceptable to NIST, the requirement for a face to fact meeting with the Registration Authority at least should be eliminated.

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9		TVAP	T	D1, Section 2.2.2, p. 7	This section appropriately suggests that current employees need not be fully reprocessed and basically will be "grandfathered" on the basis of previous agency background checks. TVA strongly supports this. It is commonsense recognition that agencies have already checked the backgrounds and proved the identities of their employees. Ignoring this and requiring all employees and contractors to be fully reprocessed under the new standard would be very burdensome and not possible to do by the October 2005 compliance date for phase 1. TVA, and presumably other agencies, also do background checks on some or all parts of their contractor workforces. The standard should also accept these background checks.	To clarify that previously checked employees need not be re-proved, the following underlined phrase should be added to this section: ..." <u>most recent previous check satisfying previous agency requirements are on file.</u> " We also recommend that similar recognition be extended to existing background checks for contractors.
10		TVAP	T	D1, Section 2.2.3, p. 7	Federal Investigations Notice 01-10 acknowledges the delay that occurs with NAC checks and gives agencies the authority to grant interim clearances pending completion of certain elements of an SBI. SBIs are a very high level of background investigation and is used for granting Top Secret clearances. FIPS 201 should provide similar flexibility.	TVA recommends that the proposed standard allow agencies the option of issuing interim clearances pending completion of NACs or other minor elements that may inordinately delay the process. See TVA Comment No. 7.
11		TVAP	T	D1, Section 2.3, p. 7	The specification that the Authorizing official photograph the applicant is unnecessarily restrictive. A photograph could be taken at any time in the process, but it would be more efficient overall if any required photograph is taken by Requesting Official so that it can accompany documentation through the rest of the process. Additionally, if the forms of identification provided by an applicant contain a photograph that is sufficiently recent and a copy of this identification is included with the documentation another photograph should not be required.	Delete "shall photograph the applicant at the time of issuance" and replace with "shall obtain an appropriate photograph of the Applicant if one does not already exist among applicant documentation." See TVA Comment No. 8.
12		TVAP	E	D1, 2.3, p 7.	This section duplicates information in section 5.2.2, pp. 42 and 43, but is not as complete.	See TVA Comment No. 3.

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13	Tennessee Valley Authority	TVAP	G	D1, Part 2: PIV II, p. 9	See TVA Comment No. 3. Without an opportunity to review OMB's guidance for PIV-II in concert with this proposed standard, the ability to fully comment on the merits and ramifications of the standard is limited.	NIST should ensure that full implementation of FIPS 201 is aligned with OMB's guidance issuance schedule. At a minimum, limiting implementation of PIV-I to just identify proving and registration will reduce the risk of inconsistencies with OMB guidance.
14		TVAP	T	D1, Section 4.1.3.g, p.18	In order to enable cardholders to display the card when in an agency facility, they only need to be able to use a cord, chain or clip to attach the card to clothing. To require the use of badge sleeves is an unnecessary expense. The size of the punched hole can be limited to be unobtrusive to the function of the card.	Delete existing 4.1.3.g, and replace with: The PIV card may be punched with a hole no larger than 5/8" by 1/8" [or similar measurement]. The PIV card shall not be otherwise physically altered in any way."
15		TVAP	T	D1, Section 4.1.4, p. 19	The specification of font size, etc., is unnecessarily restrictive. The standard should focus on the kind of information that must be included on badges and not limit agency discretion to format the information in ways that best serve their individual needs.	The standard format needs to provide some flexibility to meet individual agency needs.
16		TVAP	T	D1, Section 4.1.6.1, p. 24	It is too restrictive to say that every PIV card shall implement PIN-based cardholder activation. PIN-based cardholder activation may not be required for positions and facilities of lower sensitivity.	Replace first sentence in 4.1.6.1 with: For access to designated facilities of sensitivity levels 3 and above, PIV cards shall implement PIN-based cardholder activation.
17		TVAP	E	D1, Section 5.2.1, pp 40-41	Information in the section is duplicative of information in 2.2.1, 2.2.2, 2.2.4, pp. 5-7, including Tables 5-1, and 5-2.	See TVA Comment No. 5.
18		TVAP	T	D1, Section 5.2.4, p. 46	The draft proposes to require new biometric and identity verification when a card expires or attributes change or, possibly, when it is renewed. To avoid unnecessary costs, this needs to be appropriately limited. Name changes, for example, should require a new card, but not re-verification of fingerprints and facial image. Title changes should also not require re-verification. There may be other similar circumstances that the standard should recognize.	Do not require new biometric and identity verification when a card expires, a replacement is needed, or attributes change unless the particular situation calls into question the continuing validity of these data .
19	TVA	IS**	E	4.1.4.4.f., p22	The word "front" should be "font" in the two instances; (1) "...shall be Arial Regular front...", (2) The front used..."	(1) "...shall be Arial Regular font...", (2) The font used..."

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20	TVA	IS	E	5.2.1.2, p42	The word "expect" should be "except" in the text "...for current employees expect that..."	"...for current employees except that..."
21	TVA	IS	G	5.2.5, p47	The section on how to ensure the card is deactivated/retrieved when it is no longer valid should be strengthened to ensure that all agencies use the same process for this important function.	Strengthen and/or better define the process. See TVA Comment No. 6.
Additional Comments on Special Publication 800-73						
22	TVA	IS	E	E.2, p77-78	This section (E.2 Acronyms) does not list all acronyms used in the document.	Define BSMB, CMS, CBEFF, DN, and all other undefined acronyms used in the document.
23	TVA	IS	E	Page 13, 4th paragraph, 2nd sentence	Clarification	Delete the word "is"
24	TVA	IS	E	Page 20, last paragraph	Clarification	Need to put the chapter number in instead of "xxx"
25	TVA	IS	E	Page 39, Purpose		Need to put a space between the words "selected" and "card"
26	TVA	IS	E	Page 56, 1st sentence	"Comprining" is not a word	Change the word "comprining"
27	TVA	IS	E	Page 67, 1st sentence	Clarification	Change "is used search"
28	TVA	IS	E	Page 92, 1st sentence		Spell "response" correctly
					* TVA Police - TVAP	
					** TVA Information Systems - IS	