

Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1401

D. LeAnne Stribley
Executive Vice President, Administration

December 20, 2004

SENT VIA EMAIL

Dr. Shashi Phoha, Director
Information Technology Laboratory
National Institute of Standards
and Technology
100 Bureau Drive, Stop 8900
Gaithersburg, Maryland 20899-8900

Re: Federal Information Processing Standards (FIPS) Publication No. 201
Comments

Dear Dr. Phoha:

The Tennessee Valley Authority (TVA) appreciates the opportunity to provide comments on the proposed FIPS 201, Personal Identify Verification for Federal Employees and Contractors. Additional comments are being provided on Special Publication 800-73 that is related to the proposed standard. TVA supports the effort to enhance and standardize the processes for authenticating the identities of federal employees. Not only does this hold the promise of improving the security of agencies and the information processes and facilities under their control, but making issued credentials operational throughout the federal government should promote efficiency. As requested, we are enclosing detailed comments on the comment template provided by NIST. We want to emphasize a few general concerns.

To the extent possible when formulating the proposed standard, NIST should take into account important differences among agencies. TVA is a government corporation, and it functions much like a private entity. It receives no appropriations. Even if OMB successfully supplements agency budgets to include FIPS 201 activities during FY 05, this will not help TVA. Because TVA's FY 05 budget has already been set and approved, it will be very difficult to change the budget to cover FIPS 201 activities this year. For this and other reasons discussed below and in our detailed comments, NIST should limit the activities that are to be completed by October 2005 to the fewest possible consistent with HSPD No. 12.

TVA also has a work force that likely is not typical of other agencies. We employ a large number of additional personnel (unskilled and skilled laborers) for limited periods of time for important tasks such as maintenance and repair of our generating units. Often these individuals are employed directly by TVA, but they can be employees of

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contractors retained by TVA. Frequently, these additional personnel have to be hired and put to work in a very short time period (from hours to a few days) in order to repair generating units that have suddenly gone out of service (called a "forced outage" in the utility industry). Maintaining reliable operation of our generating units and returning broken units to service as quickly as possible are critical to fulfilling TVA's responsibility for providing affordable and reliable electric service to more than eight million people. Unless the standard has provisions addressing this kind of situation, it will not be workable at TVA or other agencies that also employ individuals on a short-term or seasonal basis.

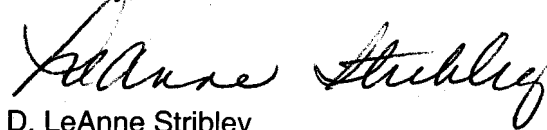
As suggested above, we are very concerned about the schedule for implementing FIPS 201 and uncertain as to when mandated activities are to be completed. If the plan is to fully implement FIPS 201 by October 2005, we do not think that is possible. Even identity proofing and registration of employees and contractors by this date will be very difficult to accomplish. The standard is still in draft. After the standard and detailed specifications are finalized, agencies will need time to re-configure processes, complete identity proofing and registration activities, and more time to procure, issue, and install complying credentials (smart badges) and associated equipment (readers). Because detailed specifications have yet to be established, we seriously question whether vendors will be able to supply sufficient numbers of compliant badges and associate equipment by the October 2005 date.

We also are confused by OMB's role and what it will accomplish if FIPS 201 is to be fully implemented by October. OMB is tasked with issuing guidance to agencies for transitioning from the minimum requirements of PIV-I to the detailed specifications and requirements of PIV-II. We are not sure what this means, but that guidance has yet to be proposed and issued, and full implementation of FIPS 201 would seem to depend on it. NIST should clarify its expectations for the timing and relationship of all of these activities.

Finally, we assume that agencies, like TVA, which manage facilities licensed by the Nuclear Regulatory Commission (NRC), are to continue to conform to applicable NRC requirements for facility and systems security and employee clearances.

If you have any questions, please call Barry Walton at (865) 632- 7839.

Sincerely,



D. LeAnne Stribley

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GRS:CBR
cc: Barry B. Walton, ET 11A-K

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