Comment Template for: NIST SP 800-63-4 Suite (Initial Public Draft)

Please submit responses to dig-comments@nist.gov by March 24 April 14, 2023

Organization:	*Prove Identity*
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Comment #	Publication (Base, 63A, 63B, 63C)	Section	Page #	Line #	Comment (Include rationale for comment)	Suggested Change
1	63A	4.3.2	10	536	General comment about digital evidence. This seems to suggest that the only digital evidence that has been generated	Establish a section that considers alternative to traditional doc-centric approaches. Even mobile driver's licenses are
2	63A	4.3.3.2	11	574	Requiring a biometric characteristic defeats the charge of inlcusivity. We should allow for alternative methodologies that	Consider striking or amending to allow for other approaches that meet spefic accuracy targets.
3	63A	4.3.3.2	11	578	Assuming a SIM card meets the criteria for 3, 4, and 5; they don't have expiration dates but can be validated to be	Consider allowing security features that can be "expired" by external means and validated as such (example: disconnect
4	63A	4.3.4.1	12	606	I've never understood why there aren't accuracy guidelines associated with evidence validation. Document capture from	Broader consideration - look at providing best practices when evaluating evidence types and set thresholds that should be
5	63A	4.4.1	14	663	Would silent mobile authentication that results in returning a phone number be considered an "enrollment" code?	
6	63A	4.4.1	15	684	I'd like to see the definition of Control of a Digital Account expanded to be inclusive of onboarding flows that take	Consider expanding definition to include alternative onboarding flows (see https://assets-global.website-
7	63A	5.1.6	21	869	With a mobile first onboarding flow, users have traditionally received OTPs sent to their devices. Lower friction	Include a section on silent mobile authentication as an acceptable measure for binding enrollment and re-establishment
8	63A	5.4.4.1	29	1127	I feel like a 3rd alternative should be added to the Remote Identity Proofing for binding. Biometrics lead to inclusivity	
9	63A	6.1	34	1258	Is the purpose to record images of the collected evidence (in the case of document capture) as well as the attribute	
10	63B	Table 1	13		For re-authentication, consider allowances for authenticators that provide continuous monitoring of validity (via	
11	63A	4.2	22	494	Pii is generally used to find/locate the right person, but more and more tokens and pointers to person records may be	
12	63A	4.3	22	496	The goal is to verify a consumer and the friction should match the risk level of the transaction. Experience is the utmost	
13	63A	4.3	10	536	a bank onboarding a customer would never be able to let a person type in their name and then use a credit bureau with	
14	63A	4.3.3.2	11	574	This requirement forces document-based forms to identity proof to strong. however, this is why banks and commerical	
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