

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

Please submit responses to [dig-comments@nist.gov](mailto:dig-comments@nist.gov) by March 24, 2023

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Comment #	Publication (Base, 63A, 63B, 63C)	Section	Page #	Line #	Comment (Include rationale for comment)	Suggested Change	
	63-Base	5.2.2.1	31	1198-1199	As written, the IAL1 criteria do not seem practically different from IAL2 in actual implementation. If one cannot accept	Remove requirement from IAL1 for external validation of core attributes.	
	63-Base	5.2.3.1	50	1252-1254	The text asserts that if no PII is required, then identity proofing is not required. This appears to be a false statement.	Clarify/correct the statement to not suggest that "no PII = no ID proofing required".	
	63A		2,2	4, 412-415	As written, the IAL1 criteria do not seem practically different from IAL2 in actual implementation. If one cannot accept	Remove requirement from IAL1 for external validation of core attributes.	
	63A	Section 4.3.4.2	13	617-619	Should not be required for IAL1 as long as lines 624-626 are in force. IAL1 should allow the visual and tactile inspection	Remove requirement from IAL1 for external validation of core attributes.	
	63A	Section 4.3.4.3	13	625-626	Should not be required for IAL1	Remove requirement from IAL1 for external validation of core attributes.	
	63A	Section 4.3.4.4	13	629+	Should not be required for IAL1, or add the evidence itself as a validation source of the core attributes for IAL1 only.	Remove requirement from IAL1 for external validation of core attributes.	
	63A	5.4.2.1	26	1056	IAL1 IS LOW assurance. One strong (presenting a gov-issued photo ID for visual inspection) should be sufficient for an	IAL1 accepts a single STRONG piece of evidence; delete "and one piece of FAIR" for IAL1.	
	63A	5.3.3	27	1070-1075	Should not be required for IAL1. IAL1 should allow the visual and tactile inspection by trained personnel, but be able to	Delete lines.	
	63B	9.1 - 9.2	59	1998-2003	Statements about Privacy Controls and NIST 800-53 seem out of scope for this document on authentication strength and	Remove explicit requirement to implement 800-53 privacy controls from this document, or explicitly scope it to federal	
	63C		2	347 & 364	Not all assertions need identify the subscriber. Incoming user attributes exist on a spectrum:	Revise text to not be prescriptive in sending an identifier. Change to "An assertion MAY include..."	
	63C		4	20	459	Seeking clarification... the text states that all FAL levels require at least FISMA Moderate control baselines. Is that	Clarification.
	63C		4,4	10, 550-555	At this location and other associated locations in this document: what's the code for attribute values? Should an attribute	Request clarity on all required xAL tagging in federated assertions. Recommend NOT leaving it up to each individual CSP	
	63C	Overall			Throughout, there seems to be informative information and opinion on methods laced within normative sections.	Rewrite 63C to separate non-normative text from normative text. Suggest following flow of 63A.	