

**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 April 14, 2023

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Comment #	Publication (Base, 63A, 63B, 63C)	Section	Page #	Line #	Comment (Include rationale for comment)	Suggested Change
1	63B	5.1.1.2	15	714-715	<p>Delete the original sentence and replace it with a more scientific one: A website SHALL only reject a password because it is weak (i.e., easily to be guessed), not because of the substrings it contains (e.g., the name of the service). See this suggestion on the upper-right of page 1550 of the following [SEC19] work:</p> <p>[SEC19] Ding Wang, Ping Wang, Debiao He, Yuan Tian. Birthday, Name and Bifacial-security: Understanding Passwords of Chinese Web Users. Proceedings of the 28th USENIX Security Symposium (USENIX Security 2019), pp.1537-1554.  <a href="https://www.usenix.org/system/files/sec19-wang-ding.pdf">https://www.usenix.org/system/files/sec19-wang-ding.pdf</a></p>	<p>Delete the sentence "Context-specific words, such as the name of the service, the username, and derivatives thereof " , and replace it with a more scientific, actionable guideline:</p> <p>A website SHALL reject a password only because it is easily to be guessed (i.e., rated "weak" by state-of-the-art password strength meters) [SEC19], not because of any substring(s) it contains (e.g., the name of the service, the username, and derivatives thereof).</p> <p>[SEC19] Ding Wang, Ping Wang, Debiao He, Yuan Tian. Birthday, Name and Bifacial-security: Understanding Passwords of Chinese Web Users. Proc. of the 28th USENIX Security Symposium (USENIX Security 2019), pp.1537-1554.  <a href="https://www.usenix.org/system/files/sec19-wang-ding.pdf">https://www.usenix.org/system/files/sec19-wang-ding.pdf</a></p>
2	63B	5.1.1.2	15	726-728	<p>A non-full-string matching algorithm is necessary for a website that wants to capture trivially modified variants of listed (and potentially very weak) memory secrets.</p> <p>While non-full-string blacklist matching algorithms can provide strong security against guessing attacks, they may seriously impair password-creation usability if used alongside a large blacklist [CCS20]. Therefore, we recommend using both a moderate password blacklist (e.g., 10<sup>6</sup> [CCS20]) and an accurate password-strength meter (e.g., Zxcvbn, fuzzyPSM, and [SEC23]) to detect and prevent weak passwords.</p> <p>[CCS20] Tan, J., Bauer, L., Christin, N., &amp; Cranor, L. F.. Practical recommendations for stronger, more usable passwords combining minimum-strength, minimum-length, and blacklist requirements. In Proceedings of ACM CCS 2020, pp. 1407-1426.  <a href="https://dl.acm.org/doi/10.1145/3372297.3417882">https://dl.acm.org/doi/10.1145/3372297.3417882</a></p> <p>[SEC23] Ding Wang, Xuan Shan, Qiyong Dong, Yaosheng Shen, Chunfu Jia. No Single Silver Bullet: Measuring the Accuracy of Password Strength Meters. Proceedings of 32nd USENIX Security Symposium (USENIX Security 2023). pp. 1-28.  <a href="http://wangdingg.weebly.com/uploads/2/0/3/6/20366987/usenix23-n3-fullversion.pdf">http://wangdingg.weebly.com/uploads/2/0/3/6/20366987/usenix23-n3-fullversion.pdf</a></p>	<p>Modify: "This is particularly important following the rejection of a memorized secret on the above list as it discourages trivial modification of listed (and likely very weak) memorized secrets."</p> <p>To: "This is particularly important after rejecting memory secrets from the above list, as it discourages selecting passwords rated as weak (including, but not limited to, the listed memory secrets and their trivial modified variants) by an accurate password-strength meter [SEC23]."</p> <p>[SEC23] Ding Wang, Xuan Shan, Qiyong Dong, Yaosheng Shen, Chunfu Jia. No Single Silver Bullet: Measuring the Accuracy of Password Strength Meters. Proceedings of 32nd USENIX Security Symposium (USENIX Security 2023). pp. 1-28.  <a href="http://wangdingg.weebly.com/uploads/2/0/3/6/20366987/usenix23-n3-fullversion.pdf">http://wangdingg.weebly.com/uploads/2/0/3/6/20366987/usenix23-n3-fullversion.pdf</a></p>