

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

Please submit responses to 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	
1	63A	10.1	10.1	51	1738	Another possible mitigation is allow the person the option to come in person.	
2	63A	10.1	10.1	51	1738	There needs to also be an alternative path to submit electronically all identity evidence that is associated with the change in name. Similar to what is done for a passport or a REAL ID. Speak with the CA DMV for an example of how they do the upload of identity evidence prior to an applicant's appointment.	
3	63A	10.1	10.1	52	1758	Comment also for lines 1741-1742. I don't understand what an Applicant Reference will vouch for if documentation is missing or not matching what is in official records. A paper trail must be provided to show the change in name.	
4	63A	5.1.8	23	930-932	930-932	While we applaud the inclusion of requirement of testing biometric algorithm, this requirement only incentivize algorithm	NIST should consider adding other dimensions to this Testing requirements such as: specification on the dataset type to be
5	63A	4.3.3	10	542	542	Provide a strength of evidence table (perhaps as an appendix or in 4.3.3) for typical well-known IDs. Most likely a subset of	"Digital Identity Guidelines: Implementation Resources" Table A-3-2. Notional Strength of Evidence.
6	63A	4.3.3.1	11	548	548	Fair evidence is more of a barrier than a security feature.	Remove the need for Fair evidence at IAL2 & IAL3
7	63A	5.1.9	24	960	960	enhancement to phrasing	"promote equality of access"
8	63A	5.1.9.1	25	1002	1002	Trusted Referees are needed to achieve equity, however there is always a chance that the ability to bypass evidentiary req	Add a further requirement that the CSP maintain a link between the Trusted Referee and the applicant in their records.