## Comment Template for: NIST SP 800-157r1 (Initial Public Draft)

Please submit responses to piv\_comments@nist.gov by March 24 April 21, 2023

	Organization:	Axiad
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Comment #	# Section	Page #	Line#	Comment (Include rationale for comment)	Suggested Change
		477-479	In the case of FIDO, the activation factor may already be set on the FIDO authenticator, and therefore would not prompt the user to set one.	SHALL prompt the applicant to establish a memorized secret or biometric activation factor (or both) if one has not been set for the authenticator and successfully authenticate using that authenticator	
	2. 1.:	1 1		The allowance of cross security domain authentication using derived personal identity verification credentials is not explicitly stated to be supported. There are mentions of it in section 1.1, but there is no normative section that addresses that capability. It may be said that SP 800-217 addresses it, but it also only has mentions of this capability and references this document. There appears to be an informative circle of documentation that does not explicitly address the how and allowance of.	Add language to a <i>normative</i> section that states that derived PIV credentials, both PKI-based and non-PKI-based, may be used for cross security domain authentication.
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