

JT/02-0433
IT/02-0858

August 6, 2002

**US National Body to JTC 1 - Comments on JTC 1 N 6797 -
SC 17 Proposal for a New Work Item on Biometric Data
Conventions and Formats for Identification Documents and
Cards**

The work proposed in JTC 1 N 6797, SC 17 Proposal for a New Work Item on Biometric Data Conventions and Formats for Identification Documents and Cards, is clearly work on generic biometric template standards. The US National Body does not support consideration within SC 17 of proposals for generic biometric (e.g., face, fingerprint) template formats.

Work on generic biometric template standards clearly belongs in the newly established JTC 1 SC 37 on Biometrics. The initial, approved, scope of work of JTC 1 SC 37 on Biometrics is contained in JTC 1 N 6738, which states:

Scope of SC 37: Standardization of generic biometric technologies to support interoperability and data interchange between applications and systems. Generic biometric standards include: common file formats; application programming interfaces; biometric templates; template protection techniques; and related application/implementation profiles, as well as methodologies for conformity assessment.

Additionally, in JTC 1 N 6797, reference is made to JTC1/SC17 N 2133 entitled "Finger Minutiae Encoding Format and Parameters for On-Card Matching", submitted on June 18, 2002, for discussion at the June 25-26, 2002 SC 17 WG 11 meeting. The proposed work presented in the JTC1/SC17 N 2133 predominantly relates to the definition of a generic biometric template for fingerprints, along with features such as limiting the number of minutia points and the definition of a retry counter. The US National Body strongly believes that these features are not sufficiently substantive to merit consideration specifically relating to the application

of "biometric technologies to cards and travel documents." They can and should be integrated into the definition of generic biometric templates within JTC 1 SC 37. Not to do so:

- Would result in duplicate work in JTC 1 by SC 17 and SC 37.
- Could lead to a proliferation of even more duplicate work in other ISO TCs (e.g., healthcare, banking and financial services).
- Will lead to multiple standards that are likely to be different.
- Will result in market confusion.
- Will result in less interoperability.

Further, on page two of JTC 1 N 6797, it states:

"STATUS: This document is submitted in accordance with the discussions at the WG11 meeting held on 2002-06-25/27, Berlin, Germany."

As a matter of fact and with respect to process, the US would note the following:

- Document JTC 1 N 6797 was not discussed at the WG 11 meeting.
- JTC1/SC17 N 2133 was submitted the week before the meeting. Therefore, National Bodies, and the experts at the meeting, had not even time to review this contribution and to establish positions prior to the meeting.
- Nevertheless, many experts at the meeting, expressed their position that this work belonged in JTC 1 SC 37.
- There was no attempt to document consensus at the WG 11 meeting (e.g., voting on recommendations).
- It is therefore unclear why this NP ballot was even issued.