

M1/07-0064

The Aerospace Corporation Comment on INCITS 420 -
Project 1575-D (M1/06-853 - 17th draft)

in070186

January 27, 2007

Public Comment on Project 1575-D -Application Profile for Point-of-Sale Biometric Verification/Identification

| Document Location | Comment Type | Comment (Justification for Change) | Proposed Change |
|-----------------------|--------------|--|---|
| Clause 7 and Clause 3 | Technical | The use of ANSI/X9 X9.84-2003 IS an approved standard and is appropriate within the financial services industry. The template protection method afforded by CBEFF, may be the preferred biometric container standard within M1, it is not however an approved method for ensuring the integrity and security of the information when used in conjunction with financial information. The removal of the "shall" directive from the language is irresponsible of M1.4 while these standards are under constant review and revision by other TGs such as CS1 or X9. Furthermore, the use of 'should' provides no legal ramifications against biometric POS implementers after their haphazard implementation is hacked by the inevitable crook. This standard can be revised after ISO has accepted and completed ALL the parts of ISO 19092-2006 "Financial services - Biometrics - Part 1: Security framework" and the financial services industry has adopted its protection mechanism. | POS use of biometrics shall follow the biometric data protection techniques provided in ANSI/X9 X9.84-2003 – "Biometric Information Management and Security for the Financial Services Industry" to safeguard the biometric data defined herein for confidentiality, integrity and availability, in accordance with local, regional or national policy considerations. Reinstate the normative reference to ANSI/X9 X9.84-2003 in clause 3. |

-----Original Message-----

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Subject: Comments on Project 1575 - INCITS 420

Please consider this comment from The Aerospace Corporation...