

M1/03-0460

Accredited Standards Committee, INCITS, Information Technology
INCITS Secretariat, Information Technology Industry Council (ITI)
1250 Eye St. NW, Suite 200, Washington, DC 20005
Telephone 202-737-8888; Fax 202-638-4922; Email: incits@itic.org

Date: October 9, 2003
Project: **1564-D**
Ref. Docs: **M1/03-0385**
Reply to: Creed Jones, M1.1 Chairman
Phone: 253-591-8868
Email: creed.jones@morpho.com

To: Bill Bardwell, Biometric Security Card
cc: M1.1 Members - For Information
Creed Jones, M1.1 Chairman
Sagem Morpho Inc.
From: 1145 Broadway Plaza, #200
Tacoma, WA 98402
creed.jones@morpho.com or creedj@spu.edu
Subject: M1.1 Response to the Public Review Comments received for draft standard
INCITS 378

In accordance with ANSI requirements to circulate attempts to resolve Public Review comments and to ensure that all participants are aware of the ANSI Appeals Process, we are advising you in this letter of the following items:

- 1) your right to appeal if the responses do not satisfactorily address your comment(s) , and
- 2) the current status of this action:
 - A) The M1.1 responses to your comments are attached, see below.

You are requested to respond to this letter, notifying the TG chair whether you are:

- Satisfied with the TG responses to your comments, or
- Not satisfied with the response.

Please send this response to the M1.1 chair
(creed.jones@morpho.com) as soon as possible.

Appeals Processes

1) You may appeal an action of INCITS or its Secretariat, the INCITS Appeals Procedures are in Section 5.9 of the INCITS/SD-2.

2) Notification of Right to Appeal to the ANSI Board of Standards Review (http://web.ansi.org/public/library/std_proc/anspro.html)

Please note, in accordance with BSR Procedures, those objecting to the approvals or withdrawals are hereby notified of their right of appeal. The appeal must be based on due process or lack of consensus and include a statement as to why the BSR action should be modified. The BSR will not render decisions on the relative merits of technical matters, but it shall consider whether due process was afforded technical concerns.

If you have not completed the appeals process at the standards developer, you are normally not eligible to appeal to the BSR.

M1.1 Response to the Public Review Comments received for INCITS 378

Original Comment	M1.1 response
(in document IN031034). 1. Both the finger pattern and minutia interchange format methods employ methods that will result in a loss of image resolution as compared to the resolution that is provided by the sensor. For example, the proposed finger pattern interchange format method defines the first step in the process to be the reduction of the image resolution to no less than 200 ppi. Reduction of the image resolution to this level would result in a major loss of	Noted - no change recommended. Since the minutiae record includes fields for the x and y resolutions of the minutiae space, no resolution reduction from the sensor is implied. The transformation from an image to the minutiae record is not a loss of resolution, but a change to feature-based representation.

<p>performance by Biometric Security Card's (BSC) algorithm and perhaps other similar algorithms. BSC's and perhaps other biometric pattern algorithms require a minimum of 250 ppi to maintain competitive performance levels. In addition, since most interoperability methods will require the reduction of the image resolutions, standards must be defined to insure that every vendor' biometric algorithms reduce the image using the same process.</p>	
<p>4. The proposed finger pattern and minutia interchange templates are too large in size. Vendors such as BSC and TSSI, member of the Scipher Group, have successfully developed biometric algorithms that create templates of 64 bytes or less. These algorithms don't require the re-construction of the enrolled image for verification and are preferred for applications that require the storage of templates on limited capacity media such as magnetic stripes or "2D" bar codes. A standard for an interchange format that requires approximately 350 bytes defeats the purpose of biometric algorithms that create smaller templates.</p>	<p>Noted – no change recommended.</p> <p>Many applications are quite feasible for data records of approximately 350 bytes in size.</p> <p>Future work in the area of a standard fingerprint format supporting a smaller data record is possible, and technical contributions towards it are encouraged.</p>
<p>5. The draft finger pattern and minutia interchange format methods appear to define two standards that are mutually exclusive which precludes the use of both pattern and minutia data and methods in biometric algorithms. I think that there is a</p>	<p>Noted.</p> <p>The CBEFF framework provides a good way to couple together minutiae and pattern data records. This makes hybrid applications as mentioned in the comment possible.</p>

good potential that future biometric algorithms may realized increased performance using hybrid pattern and minutia data.	
---	--

(Rev. 04/02)