

M1/03-0562

Disposition of comments from Passports Australia on 7<sup>th</sup> draft of Border Management Application Profile

I don't actually see anything in this document that is not covered (or coverable) in the ICAO Biometrics Deployment Technical Reports (and hence leading thereby to ISO Standards) either in the current version 1 or updateable into the forthcoming version 2 I am writing. If this document is for USA only then fine - but if it is intended to be put to SC37 then there should be some discussion on its context and meaning viz-a-viz the ICAO standards on Biometrics that are well and truly underway.

*(Responses to these comments follow each comment, indented and in a different typeface. Responses from Editor are in black, responses from US DHS are in blue.)*

This AP is intended for US use only.

**BW:** Border Management is broader than the topics dealt with by ICAO. While ICAO deals with travel documents, Border Management also deals with biometric identification to determine if a person has violated the terms of entry. Exit logs, not using biometrics from travel documents but using biometrics tied to a national database are covered in the Profile but not in ICAO.

That said - specific comments follow:

ICAO Normative References need to also include the Biometrics Deployment Technical Report, Contactless IC Technical Report and PKI Technical Report as well as the LDS Technical Report already mentioned.

Contributions detailing the specific references to be included in Annex A will be welcomed by the Editor.

Reference to ICAO standards are very light on. Weighting to the ICAO documentation is now simply alongside BioAPI and CBEFF and X9.84. There needs to be a separate section providing substance, weighting and narrative around ICAO standards and technical reports.

Ditto.

Under section 6.1.1, Pre-Arrival #2 - checking biometrically for holding a passport from another State is an unlikely activity in practice.

Noted, but is still a potential application for biometrics at some point in the distant future.

**BW:** We will be able to check against our databases to see if we know that a person has a passport from another state (under certain circumstances). If a person enters the US with a passport from one nation and a corresponding visa and then applies for a visa using another

passport, we will be able to discern that be running fingerprints against our database.

Under 6.1.2 #5 - should also include matching against the Passport Data Page (by human inspection).

This item describes processes that "can" be performed using the biometric data (potentially) available to the system. It's not clear how this comment fits with this list item.

BW: Comparison of the BIDR against the data page need not be solely by human inspection. The US is considering that the full-page scan of the document page can capture the photo image printed there and compare it to the photo stored on the chip to assist in validating the chip-document link. The inspector, of course, should always personally examine the document page. The MRZ should be compared to the data on the chip, using automated means.

6.3 - note Signature is not an ICAO-compliant Biometric

Does "ICAO-compliant" really mean "ICAO-recommended"? This AP is required to be biometric-technology neutral, thus signature/sign is included as one of the technologies which have interchange format standards under development.

BW: True, ICAO doesn't recognize signature, but it also currently doesn't recognize iris either. The Profile is meant to include all border management programs, including facilitated travel, which may not require travel documents compliant with ICAO for each border crossing. Thus, this Profile must by definition be broader than ICAO.

6.4 - note BDBs should be compliant with the ICAO LDS. The ICAO LDS includes within it Biometric Data Blocks in CBEFF format.

Disagree. The ICAO LDS should be compliant with CBEFF and any relevant BDB format standards. ICAO should specify and publish a CBEFF compliant patron format.

BW: I believe that we should state that for travel documents it should be compliant with ICAO LDS. The LDS does address CBEFF. However, for data interchange, there may be circumstances where ICAO may not cover the data file (i.e. not a passport, visa or other travel document)

The document fails to highlight the importance of technical specifications or practical considerations such as height of reader, cameras, capture devices, lighting, design of gates etc.

If such standards exist the Editor would welcome contributions designed to add them to the AP.

BW: True -- There are so many variations of operating circumstances, I'm not sure that this is practical.

Annexes - There are WAY too many mandatory fields here. Many of which are not captured by countries let alone planned to be in chips or databases. There is no way known that we could meet all of the Mandatory fields and for some fields I do not agree with the optional ratings either (for example data confidentiality).

The specifications of mandatory/optional fields were, in general, contributed by the various editors of the referenced standards. Contributions from experts in the border management realm would no doubt improve the relevance and applicability of the annex tables.

BW: I agree that the mandatory fields need to be re-examined. I will take as a task that DHS will review them carefully and make a submission as to what we feel should be mandatory.

These items and relative ratings really need to be studied and based on a solid case of context of use and context of enrolment applicability in border management applications. Another example is I think item 2 in table A.3.4 for ANSI/X9 with reference to enrollee authorization. Of course we assume that this is the case by virtue of participation - but the assumption I don't believe would necessarily hold for the purposes of attaining "standards".

As indicated above, specific contributions from experts in the border management realm would surely improve the Profile as a whole.

BW: DHS will take on examining this section in detail.

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