

**Approved Disposition of Public Review comments on INCITS 395
Information Technology – Signature/Sign Image Based Interchange Format
(INCITS Project: 1603D)
Public Review Period 06/04/04 – 07/19/04**

Organization	Comment	Proposed Disposition
<p>NIST PR-1</p>	<p>The draft standard in its current form is unacceptable for the following reasons:</p> <p>1. The conformance clause is not specific on identifying normative clauses in the standard that would allow implementers to achieve interoperability and data interchange. This clause only addresses a requirement of capturing and processing sign or signature data from a pen/digitizer combination with “sufficient accuracy and resolution as represented in the manner described in sections 4, 5, and 6 herein” but it does not include a conformance requirement for data interchange.</p> <p>Although the scope of the standard claims that the standard specifies a ”concept and data interchange format”, according to clause 6.3 the data record includes only a mandatory fixed-length record header. The other three data representations (feature, template, and raw data) are included as “optional areas”.</p> <p>Potentially, an implementation could claim conformance to the standard by generating a record that would include only a standard header or a standards header followed by proprietary data.</p> <p>Therefore, one or more of the data features specified in Clause 6 (6.5, 6.6 and 6.7) must be mandatory in the standard.</p>	<p>Noted</p> <p>Accept. The following changes are proposed to address NIST comments. Some of the proposed changes are deemed to be substantive.</p> <p>Clause 6.3 (substantive) Clause 6 will be amended to reflect the normative requirements that:</p> <ol style="list-style-type: none"> 1) Either Signature/Sign Feature Data or the Signature/Sign Raw Biometric Sample be present in any Interchange. Both these data are currently optional. 2) If the Signature/Sign Feature Data are present, then Common Feature Data associated with the Feature Data must be present (currently optional and entitled Common Intermediate Data). In addition any Proprietary Feature Data shall be contained in a separate Proprietary area, which shall also contain any proprietary Template Data required by the application. There shall be no reference to Common Template Data in the standard. 3) The following paragraphs would also be amended to

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	<p>2. Clause 7 contains example biometric data formats. This clause should be made an informative Annex.</p>	<p>reflect the changes. a) Introduction b) Scope c) Conformance</p> <p>Accept – and change the content to reflect the changes above.</p>
<p>Transaction Security PR-2</p>	<p>1) Title Although the original INCITS Project 1603D was entitled “Signature/Sign Image Based Interchange Format” the M1 members changed the title to “Biometric Data Interchange Formats – Signature/Sign Data”. The draft standard contains references to both titles. To be consistent with the M1 process, TSI would recommend the latter title.</p> <p>2) Clause 4.4 Add the following sentence to Clause 4.4 “A resolution value of zero shall be used to indicate that no Force data are generated.”</p> <p>3) Clause 4.6 Remove the spaces between “stationary” and “pen” in the first line</p> <p>4) Clause 6.3 In order to deal with the NIST Comment (Public Review comment 1) TSI recommends that this clause be amended to reflect the normative requirements that:</p> <ol style="list-style-type: none"> 1) Either the Signature/Sign Feature Data or the Signature/Sign Raw Biometric Sample be present in any Interchange. Both these areas are currently optional. 2) If the Signature/Sign Feature Data is present, then the Common Data associated with the Feature Data must be present (currently optional) 	<p>Accept: The title: “Information Technology – Biometric Data Interchange Formats – Signature/Sign Data” will be adopted and a new project with this title will be submitted to INCITS.</p> <p>Accept - for greater clarification</p> <p>Accept – Editorial</p> <p>Accept – See NIST Comments and Proposed Disposition under PR 1</p>

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<p>Transaction Security, Inc. PR-2</p>	<p>5) Clause 6.4.1 Replace the last word of the clause, “table” by “Table 1”</p> <p>6) Clauses 6.4.6 and 6.4.7 The clause text font size is too small</p> <p>7) Clause 6.5.1 And Table 2 Amend 6.5.1 and Table 2 to reflect Comment 4 above 4th row, 3rd column.</p> <p>The reference to 6.5.3 should be 6.5.4</p> <p>8) Clauses 6.5.3 and 6.5.4 Amend to be compatible with Comment 4 above</p> <p>9) Clause 6.6.1 – Table 3 Template Data Row – 3rd column Delete the first and last sentences of this comment to reflect the fact that the Common Template Data field is null initially.</p> <p>10) Clause 6.7 and Table 5 The reference to Table 5 in this clause should be Table 4. Table 5 should be Table 4</p> <p>11) Clauses 6.7.1, 6.7.2 and 6.7.3 The first sentences of each clause should be preceded by “If the Raw Signature/Sign Data is present”</p> <p>12) Clause 7 Consistent with NIST Public review comment 2, remove this clause and include it as an informative Annex. Ensure compatibility with any of the changes above.</p>	<p>Accept – Editorial</p> <p>Accept - Editorial</p> <p>Accept – Results from NIST comment</p> <p>Accept – Editorial</p> <p>Accept – Results from NIST comment</p> <p>Reject – Delete all references to Common Template Data</p> <p>Accept – But amend and renumber to be compatible with comment 4 above</p> <p>Accept – For greater clarification</p> <p>Accept – For better document structure.</p>

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<p>3M-AiT PR-3</p>	<p>Here are some comments from 3M-AiT on INCITS 395 (Signature/Sign Image based interchange format).</p> <p>1. About 6.3 Signature/Sign Record Organization All the data areas in the record are optional. It is not clear how that would work in practice. If no data is presented, then the record is useless. We suggest that at least one data area should be mandatory.</p> <p>2. About 4.5 Pen Angle The figure 1 is a black image area in the document I downloaded. It should be a picture to illustrate pen angle I guess.</p>	<p>Accept – Apply the changes defined to address the NIST and TSI comments.</p> <p>Noted – The Editor’s original Word document contains the correct image. The new Word document resulting from this disposition of comments will contain the correct figure 1.</p>