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1.			ge	<p>This document is entitled "... Format for Data Interchange," but, in addition to the format it also implicitly defines the <u>underlying information model</u>, including both <u>which</u> information will be included in an interchange and the <u>meaning</u> of that information. Such a broad scope could lead to incomplete analysis of the needs of any one layer.</p> <p>a. Consider more explicit separation of the data element dictionary from the data structures. (Is there no standard reference you can cite that defines most or all of the standard statistical terms?)</p> <p>b. Why is the interchange format defined at such a low, platform-sensitive level? That is, <i>why</i>, rather than a human-readable format like tab-separated ASCII or XML, have you selected to specify layout of the data at the binary level? This decision is not motivated in the introduction.</p>	<p>a. Make explicit the separation of the data element dictionary from the data structures.</p> <p>b. State the motivation for a low-level (compact binary) format in the introduction.</p>	

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2.			ge	<p>Some useful information about score distributions is not accommodated. Consider the following:</p> <p>a. Biometric distributions often contain spikes (two-sided discontinuities), most notably at the extremes of the score domain. Including information about each spike would often lead to a much more accurate description of the overall distribution.</p> <p>Distributions may be discrete, continuous, or a mix of the two (e.g., continuous with spikes). Subtypes C, D, E appear to be insufficient to characterize non-continuous distributions.</p> <p>b. Distributions may be bounded or unbounded, but there is no mechanism to convey this. For instance, Subtype C necessarily has a finite domain, but does its use describe a bounded or unbounded distribution?</p> <p>Do not assume that the data in these records is based exclusively on observed sample values. A vendor can know from the algorithm design whether a distribution is bounded or not.</p>	<p>Provide a mechanism to describe <u>discontinuities</u> in the distributions.</p> <p>A. Subtype C currently allows $x_i = x_{i+1}$. This might suffice, though it seems inconsistent with the idea that this is a "lookup table."</p> <p>B. Subtypes D & E might be augmented by additional fields (a list of singularity descriptions); multiple occurrences of subtypes D & E in record types 4 & 5 might provide an alternative approach.</p> <p>Provide a mechanism to indicate whether the extreme x-values represent <u>bounds</u> on the distribution.</p> <p>C. Add two more fields in the Type 3,4,5 records to convey known or observed extrema: $\langle \{K,O\}, \min \rangle$, $\langle \{K,O\}, \max \rangle$.</p> <p>D. Provide an optional sample size field in subtypes C,D,E (useful for interpreting observed extrema, and possibly for smoothing CDFs).</p>	

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3.				The introduction concludes that “One biometric system may be swapped out for another if it is accompanied by its fusion information format record.” Although score-level fusion is a central concern, there is more to systems integration. Not only does this standard not address the interface for exchanging scores, it seems to imply that scores are the only information being exchanged. I am particularly concerned about error handling. Consider a system with a known failure to enroll rate of 2%. When an FTE occurs, can it be flagged as such, or must it be reported as a low similarity score (which implies a loss of information)? Is this 2% included in the computation of the statistics contained in the FIF record?	<p>a. In the introduction, note that interfaces are the domain of, for instance, the effort to emend BioAPI with fusion infrastructure.</p> <p>b. Append to section 1: “, or the interface between the scoring and fusion systems.”</p> <p>c. In section 4, state “Because FIF records describe score distributions, errors such as FTEs are included in those distributions if and only if the biometric system reports those errors as scores.”</p>	
4.			ge	The Dataset ID field and the notion of “swapping out” a biometric system raise questions of how an integrator works with this data. Does one FIF record contain information on distributions computed from one Dataset, or possibly more than one? How does the integrator select among records for multiple datasets from one vendor? What does the integrator do, for instance, when one vendor provides Type 2 information and the other provides Type 3? Who benefits from having a choice between B-spline and Hermite, rather than standardizing on one?	<p>a. In intro, discuss how integrator (or fusion process) copes with the possible variety of records and datasets, or how you envision this standard will be applied without such confusion arising (e.g., application profiles?).</p> <p>b. In 5.1, state explicitly that the collection of FIF records shown in that first unlabelled figure may correspond to different datasets. Or better, move the Dataset ID field to the Fusion Header Block.</p>	

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5.				Implicit in this entire approach is the assumption that the scores to be fused are statistically independent events. This limitation is never mentioned.	Add to intro: "As FIF records describe score distributions from each biometric system independently (i.e., the records contain no information on the joint distributions), this standard is designed to support only those fusion techniques based on an independence assumption. Note, however, that such techniques are often effective when this assumption is not entirely correct. FIF records may not be suitable for multi-algorithm fusion, or other circumstances where the score distributions are highly correlated."	
6.			ge	<p>The CDFs of record types 3-5 seem sufficient as a basis for the better fusion methods, however I have some reservations:</p> <ul style="list-style-type: none"> Clearly one can fuse using the information specified by this standard (one can fuse without any distribution information), but what criteria is being applied to decide whether this information is sufficient to fuse "well"? To what extent has the adequacy of this information been tested prior to standardizing its bit-level representation? I have successfully used similar lookup tables of estimated PDFs for fusion. Where a CDF is differentiable, the PDF can be derived, but much of the practical challenge concerns working with discrete sample data. 	None, assuming that the information whose format is being standardized has been demonstrated in practice to meet the intended needs.	

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7.			ge	Many of the following corrections are merely examples - locating repeated instances is left to the editor.		
8.	Intro	para 2, sentence 2		Contrary to this sentence, score-level fusion is sometimes used for combining the results of two algorithms on one biometric sample	Revise: "This is implemented after two or more systems have separately acquired, processed and matched an individual's biometric information to a previous sample <u>one or more samples</u> and produced a scalar similarity scores as output." [Alternatively, you could stay more with the original if the independence assumption is properly acknowledged to limit the scope of this claim]	
9.	Intro	para 2, latter part		Classification is a step after fusion. Score-level fusion does not create a boundary between the two classes. "In general" (last sentence) seems to refer to more than two systems, in which case the boundary is a hyper-surface, not a set of paths.	Delete last two sentences of paragraph.	

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10.	Intro	para 3		<p>By sentence number:</p> <ol style="list-style-type: none"> 1. "differently" than what? 2. Of course they are "meaningful:" higher scores are "more similar." The transformation generally converts to ratio statistics (vs. ordinal), with common units. 3. "generally" or "often"? Why is this sentence here anyway? 4. Actually, it conveys prior info about the score distributions, not about the scores "being fused." 5. Normalization <i>can</i> precede fusion, but it is not necessarily a separate step. 	<p>Replace entire para: "Distributions of similarity scores are unique to each biometric system. Score ranges, and the shapes of the distributions may differ greatly. Fusion generally involves transforming these scores to a common domain. Simple normalization techniques based on statistical parameters such as the mean and standard deviation are sometimes effective, but more sophisticated techniques utilize detailed knowledge of the entire score distribution. The fusion information format defined in this standard is intended to flexibly support any of the popular transformations. Standardizing the exchange of data describing score distributions supports a modular approach to biometric systems integration."</p>	
11.	Table 1, row 1			<p>Re editor's note, this method sometimes makes sense, but not in the general mix and match context defined by the intro, last sentence.</p>	<p>Use a different example.</p>	
12.	Table 1, row 4			<p>Right tail of impostor PDF is usually well-approximated by exponential decay. B-spline is polynomial. Will it adequately model the tail over the range of mate scores? [probably OK]</p>	<p>None. [See last general comment (about demonstrating adequacy of information)]</p>	
13.	2	editor's note		<p>How does question of multiple vendors arise? One per distribution, no?</p>	<p>Delete sentence</p>	
14.	4.1 & 4.2				<p>Replace "samples" by "two sample biometrics"</p>	

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15.	4.3	NOTE		"The similarity score is used generically in this standard..."	"The <u>term</u> similarity score..."	
16.	4.4	NOTE		Seems contrary to Table 1, Type 2 example. So what is the location parameter, generally?	Replace "generally not" by "not necessarily"	
17.	5.1			First figure is not labelled. The data structure is not named. Neither is introduced.	Label and introduce the data structure and figure.	
18.	5.1	sentence 2		"The fusion head block..."	"The fusion header block..."	
19.	5.1	sentence 2		Why are Dataset ID and Score Sense repeated in each record rather than specified in the Fusion Header Block?	Move Dataset ID and Score Sense to Fusion Header Block	
20.	5.1			Types 1 and 2 are missing references to clauses in the tables. Type 4 points to 9.2.3, but should be 9.2.4 (and it's not really defined there) Type 4 says "6+8K" bytes: K is not defined; clause 6.8 says the size is variable; section 9.2 says "6+16N"	Make consistent	
21.	5.1			Why are Record Types 3-5 so similar, rather than specifying one Type that generalizes all of these and leaves room for future alternatives?	Generalize Record Types 3-5 by adding field after Distributions Present that indicates which Subtype(s) follow. Move NOTES in 9.2, 10.2, 11.2 to 6.8, 6.9, 6.10 (they pertain to the Subtypes)	
22.	5.4	sentence 1 [also 3, editor's note]		If this interchange format is motivated by CBEFF, that topic belongs in intro.	State in intro how CBEFF influenced this standard.	

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23.	5.4	sentence 3		Here and elsewhere, why mention specific modes (face, iris, etc.)? Is "Format Type" the same as "Format Identifier" in Table 3?		
24.	5.5				Replace "shall be the present" by "shall be present"	
25.	5.5.2	last sentence		The fact that "version" refers to a <i>specification</i> version and not to a version of the information contained in the record should be stated clearly, and earlier. Last sentence says version 1 revision 0.	Replace "The (4-byte) Version Number block shall consist of ..." by "The (4-byte) Version Number specifies the [earliest?] version of this standard [to which the Fusion Data Record conforms]. This field shall consist of..." Update last sentence.	
26.	5.5.3			"shall be ... shall be" [sic] Why mention the biometric mode? "entire length of <i>the record</i> " is ambiguous. Name which record.	Replace entire paragraph by "The (4-byte) Record Length Block shall be the combined length in bytes for the [Fusion Header Block and Type 1 through Type 5 records?]"	
27.	5.5.4			"Type record"?	"Type records"	
28.	5.5.5	NOTE 2		Why?? If only Type 1 & 2 records are provided, and alg B is better than A, then alg ID is useful info. Again this raises questions of how this information is used operationally: does the integrator "just know" which algorithm was used to produce a specific score, or is this communicated by the matcher?	?	

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29.	6			Generally there is mixing of data elements and structures, and the introductory sentences are likewise confused. Consider better separation as mentioned earlier. Title says "elements." Although the intro says "generic elementary data structures," Table 5 does not specify the data structure.	Use terms "element" and "structure" correctly throughout. If "container" and "structure" differ in meaning, then clarify; otherwise omit "container." Use formatting to highlight which tables define elements (meaning associated with identifiers) and which define structures (representation), and/or separate the two types into different sections.	
30.	6.3			Why is this called a Score Sense Subtype ? Neither Kind nor Parameter Origin was called a "subtype." Table 7 is labeled "Score Sense <u>Codes</u> " (and Table 5 is labeled "Identifiers"). If it is a <u>subtype</u> , then what type is it a subtype of?	Use terminology for identifiers, codes, types, and subtypes consistently and logically. Do not introduce unnecessary synonyms.	
31.	6.1	NOTE		Confusing! I don't see how an application (fusion?) could effect the same transformation regardless of which kind of values are available (sentence 1). Where should the kind be present (sentence 2)? Discuss the expected use of application profiles if they are assumed as context for this standard.	Clarify	
32.	6.2			Is it "origin," "nature," or "status"??	Change "nature" and "status" to "origin"	
33.	6.2			Why are some of these clauses phrased as "shalls," others not?	Make use of "shalls" consistent	

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34.	6.4, 8.2.4			This "common element" (Distributions Present Subtype) is described again in 8.2.4, but not in sections 9 or 10. Corresponding Score Sense Subtype (aka Sense) and Dataset Subtype (aka Dataset ID, or Dataset) are repeatedly defined in each section.	Describe these common elements once only (section 6). Name them consistently here and where they occur in tables.	
35.	6.4	sentence 1		"the impostor and genuine are included"	Replace "impostor and genuine are" by impostor and genuine fields are"	
36.	6.4	EX		"both impostor will be followed by"	Replace "both impostor will be followed by genuine information" by "descriptions of both the impostor and genuine distributions follow this field (as subtype C, D, or E records)"	
37.	6.5				Reserve some IDs for public datasets.	
38.	6.6.1				Rephrase as "Subtype A contains a kind-value pair."	
39.	6.6.2			What is Status "M"? Confusing: It's not the Status that was just defined in Table 6.	Define Status codes "M" and "O" cf. 6.2 proposal	
40.	6.6.2			"uint" and "double" implicitly reference a standard?	Specify where these terms are defined.	
41.	6.7.2	Table 11		Why are 6-13 not allowed in Field 1? Why is 3 not allowed in Field 2? Why are "fields" not mentioned in the supporting text?	Make consistent, or explain limitations. Early in section 6, state why some tables contain "field" column.	
42.	6.8			What is "K" (numbered item 2)?	?	
43.	6.9	Table 13, field 5			Replace "(see NOTE)" by "(see NOTE 2)"	

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44.	6.9	NOTE 1		"specifies is"? Do not use "[SPLINE]" as a noun.	Delete NOTE	
45.	6.9	NOTE 3		What is "the degree D"?	"degree K"?	
46.	7.2			"specified in Table 1" ??	"Table 15"?	
47.	7.2	Table 15		Field numbers (formatting)	Fix formatting	
48.	7.2.1			Table 5 contains "integer values," but now we have "decimal 1." Table 5 refers to meaning; this refers to format. Why? Also, "1 byte" does not adequately specify the format (uint does). For all that, the text adds no value over the table.	Do not confuse values and representations. Decide in general whether the text that supports a table entry will discuss meanings and values, representations, whether fields are mandatory, etc.	
49.	7.2.2			Doesn't this field contain the "Dataset ID," an element whose meaning is given in 6.5? That is, 6.5 does not define a "record" that holds a "dataset" as stated here. If my understanding is correct, then terminology is misused and confusing in many places.	Replace Dataset by Dataset ID	
50.	8.2	Table 16		"vendor specified" is not an "allowed value"	Correct Allowed values & Example of row 2	
51.	8.2	Table 16		The allowed values for rows 5 and 6 are presumably those specified in Table 11, but that interpretation does not properly distinguish location and scale.	Consider grouping Kind identifiers by location vs. scale so that allowed values can be specified	
52.	8.2.5			If it contains the "kind, origin and value" then "3" is not a valid example (Table 16).	In Table 16, row 5, provide a correct example, e.g., <1,1,1>	
53.	8.3			"iris" or "face"?	Replace iris by face (or v.v.)	
54.	9.2	Table 17, field 4		Insert "b" for binary	Insert "b" for binary	
55.	9.2	NOTE 1		Necessarily "empirical"? Contradicted by NOTE 3.	Delete "empirical"	

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56.	10.1			"it will be computed from it"?	?	
57.	10.1			"when the number of (x, F(x)) pairs is too large" Both are similarly limited to $N < 2^{32}$, so I don't see the point.	?	
58.	10.1			"degree of the B-spline shall be 3" seems contradicted by 6.9, NOTE 2 where 3 is presented as an example.	Make these two consistent	
59.	10.1			Last two sentences seem unnecessary. Similar information is not provided elsewhere.	Delete last two sentences. Move any discussion of spline to 6.9	
60.	10.2	NOTE 2		"resuling"	"resulting"	
61.	10.2	NOTE 3		Obvious from 6.9	Delete NOTE 3	
62.	10.2	NOTE 5		What are you trying to say?		
63.	11.1	para 2		"standard ... mandates the spline" No it doesn't: field 4 can be 0. cf. comment on 5.1 regarding generalizing these records.	In 6.10, state that this record is to be used for for Hermite splines only. In NOTE 1 of 6.10, delete the word "appropriate" which implies that the container (subtype?) can be used for other purposes as well.	
64.	11.1	para 2, last sentence		"because" Not logical. Same claim was made for B-spline. Other methods share this property.	?	
65.	11.2	NOTES 1,3		"Subtype D" -- E?	"Subtype E"	
66.	11.2	NOTE 5		"interpolant for function for"?	Replace "for function" by "function"	
67.	11.2	NOTE 7		"is required ... because it is more compact" Not logical. Why include Type 3 records? Other representations are more compact than Type 3 as well, so why is <i>this</i> one required? Why is compactness required (see preliminary comments)? cf. first comment regarding choice of a low-level format	see first comment, part b	

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68.	12	sentence 1		In theory one can differentiate the CDF to get the PDF and get all sorts of information as required by some techniques, however implementing this in practice on discrete data can be difficult and may lead to information loss.	Provide records to specify transformations such as the following that can be computed best by the matcher developer: <ul style="list-style-type: none"> • FAR(score) • Likelihood_Ratio(score) 	
69.	12	sentence 2		Isn't decision-level fusion already supported by scores = {0,1}?	Delete sentence	

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