NIST has not submitted comments or rebuttals. The Editor's response is the only set of statements from NIST

| Comment Number | Comment | Editor's Response |
|---|---|---|
| 1 | The 1-2010 draft proposes to deprecate the "original" format for coding minutiae -- the non-proprietary format published in previsou versions of this standard. Since that "standard" is being deprecated, and multiple other formats exist, additional values must be allowed in field 9.004 Minutiae format. The current values "S(tandard" and "(U)nstandard" won't mean much if the standard is obsolete. In 2-2008. the "standard" format was defined in XML. That language has been omitted from Annex N. | Agree that Field 9.004 loses its meaning. It is also deprecated in the second version of the draft |
| 2 | The proprietary formats of Cogent, Morpho, NEC, etc. will remain unpublished, as will the FBI's EFTS format, but this draft officially recognizes their existence and has reserved field space for them (for numeric field encoding). Version 2-2008 described mechanisms for vendors to create a substitution element for the abstract element <RecordMinutiae>. That language has been omitted from the 1-2010 draft. | That langauage is now included in the rules document for NIEM-conformant encoding |
| 3 | The INCITS M1-378-2004 was published in 1-2007, 2-2008 and is proposed to be republished in this draft 1-2010. The 1-2008 version had complete documentation for implementing m1-378 in XML. That language has been omitted from Annex G | The second draft does not include specific instructions for any encoding. The first draft was not 'clean enough' in removing all encoding descriptions, so some had remained and it seemed an error when others were missing. |
| 4 | As there is no default minutiae definition now, you may want to consider making INCITS 378 the default set. | |

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| 5 | In an effort to remove fields 5-13, there has been too much information sent to the annex. … This is especially true on the origin and angle directions | There is a description of angles and origin associated with the EFS. |