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 | Not very consistent approach – "short-tag" gets representation … but ASN.1 does not because you do not know it… | I agree. If you have someone or know someone who can provide a write-up for ASN.1, I would greatly appreciate it. Otherwise, all I can do is to mention it, and request that someone assist me. |
| 2 | I think the burden of the detailed write-up falls on whomever proposes something – at least this way you'd know they are serious about the proposal, not just throwing ideas in the air with no responsibility and no detailed reasoning behind it. [We] are pretty good at ASN.1, but it does not mean we will be spending our time writing up a detailed proposal, especially given that we have no use for this option. | It was suggested to me at a meeting as a comment following my presentation, and never followed up by the person who stated it (or anyone else). I have mentioned at meetings and public forums about the ASN.1 suggestion and asked that if anyone could help me on it, I would gladly incorporate it into the standard's draft. No volunteers. |
| 3 | I recommend for each technical representation that four considerations be addressed before the committee invests in the development of a specific representation (e.g. legacy, XML, ASN.1, etc):<br>1. That an *architectural definition* be developed for a specific technical format (e.g. is this targeted for enterprise apps, for web apps, for mobile apps, for hardware devices, or some combination of, etc.)<br><br>2. That there be a commitment to the development committee by multiple organizations<br><br>3. That there be a commitment to the certification definition and testing effort by multiple organizations | |

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4. That there be a commitment to the implementation of the new technical representation by multiple organizations within a specific timeframe