**From:** Drummond Reed
**Sent:** Tuesday, August 11, 2020 1:07 AM
**To:** dig-comments-RFC <dig-comments-rfc@nist.gov>
**Subject:** Digital Identity Guidelines comments from the Sovrin Foundation, the Trust over IP Foundation, and the W3C DID Working Group

I am writing to submit these comments on behalf of:

- The Sovrin Foundation, where I am co-chair of the Sovrin Governance Framework Working Group.
- The ToIP Foundation, where I am a Steering Committee member.
- The W3C DID (Decentralized Identifier) Working Group, where I am a co-editor of the DID 1.0 specification.

More on my background is available here. I am also co-author of the upcoming Manning book on Self-Sovereign Identity (early release edition here).

The primary comment is that the current NIST digital identity standards do not yet appear to take into account the emerging category of decentralized digital identity, also known as self-sovereign identity or SSI. The two primary open standards that are the basis for this new digital identity model are:

- W3C Verifiable Credentials Data Model 1.0 <== W3C Recommendation September 2019
- W3C Decentralized Identifiers (DIDs) 1.0 <== Work-in-Progress in W3C DID Working Group, slated to go final in September 2021

These two foundational specifications form the basis for what is becoming widely recognized as a four-layer stack for globally interoperable decentralized digital identity. This stack, named the **Trust over IP stack** by John Jordan, Executive Director of Digital Trust Services at the Province of British Columbia, was first written up as a Hyperledger Aries RFC:

- The Trust over IP Stack—Hyperledger Aries RFC 0289

This led to the launch on 7 May 2020 of the Trust over IP Foundation, an independent non-profit project hosted at the Linux Foundation. With 27 members at launch, the ToIP Foundation has grown to over 110 member organizations in three months.

The ToIP stack is best explained in this white paper from the ToIP Foundation:

- Introducing the ToIP Foundation

ToIP infrastructure is uniquely suited to tackling several hard problems with global digital identity infrastructure. One of them is the issue of data protection regulations like GDPR and immutable blockchains. A second one is digital inclusion and digital guardianship. In

late 2019 the Sovrin Foundation published major white papers on both topics:

- [Data Privacy Regulation and Distributed Ledger Technology](#)
- [Digital Guardianship](#)

Lastly, the ToIP stack considers governance frameworks as at least as important as technology to building global scalable digital identity infrastructure. The leading decentralized digital identity governance framework is published by the Sovrin Governance Framework Working Group, and includes a glossary of over 250 terms used by the Sovrin Governance Framework:

- [Sovrin Governance Framework V2](#)
- [Sovrin Glossary](#)
- [Sovrin white paper](#)

I hope these links and resources are helpful as you consider feedback on your Digital Identity Guidelines. I would be happy to arrange followup sessions with any of these three organizations.

Best regards,

=Drummond