

From: Rahul Parthe
Sent: Thursday, July 30, 2020 4:22 PM
To: dig-comments-RFC <dig-comments-rfc@nist.gov>
Subject: Comments on Digital Identity Guidelines RFC

Dear NIST Team,

We at TECH5 have reviewed the relevant documentation and would like to provide feedback/opinion on two items.

63b – Use of biometric paragraph (I feel no confidence to judge about the rest)

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Quote: The biometric system SHALL operate with an FMR [ISO/IEC 2382-37] of 1 in 1000 or better.

[TECH5 Comment: Operating at such a low FAR is not safe from our perspective, we recommend operating at least 1 or 2 order magnitudes lower]

There is also one more moment there: Biometric comparison can be performed locally on claimant's device or at a central verifier. Since the potential for attacks on a larger scale is greater at central verifiers, local comparison is preferred.

[TECH5 Comment: The statement depends on whether the concern is about risk of having all data central stored vs decentralized OR the risk of being able to tamper with matchers to override the results. Central systems do become honey pots but at same time offer greater control over tamper risk and technology refresh. Decentralized approach (if nothing is stored in central database) reduces the risk of central attack to steal identity data but at the same times increase vulnerability to local overrides and reduced audit capabilities]

We would review and comment further as time permits.

Kind Regards,

RAHUL PARTHE

