OSAC Technical Guidance Document 0007

Introduction to Application Profiles for Facial Searching

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OSAC Facial and Iris Identification Subcommittee

OSAC
Organization of Scientific Area Committees for Forensic Science

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Introduction to Application Profiles for Facial Searching

Prepared for
The Organization of Scientific Area Committees (OSAC) for Forensic Science

Prepared by
The OSAC Facial and Iris Identification Subcommittee

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Abstract

Since 1986, The National Institute of Standards and Technology (NIST) has been creating, managing, and updating a key data file format used for the exchange of biometric information entitled: **ANSI/NIST-ITL: Data Format for the Interchange of Fingerprint, Facial & Other Biometric Information.** This standard started with a basic fingerprint focus but has since evolved to support a wide range of biometric modalities. Any agency that captures, stores, and exchanges biometric information should be fully aware of and in accordance with this standard and how it forms the basic building block of effective interoperability processes.

ANSI/NIST-ITL forms the basis for an agency Electronic Biometric Transmissions Specification (EBTS), which then forms the basis for an agency Application Profile. The content and inter-relationship of these files and agency documentation is critical for the agency to efficiently manage and process biometric information.

Keywords

application profiles, facial searching, facial recognition, EBTS, ANSI/NIST-ITL, subject acquisition profiles, SAP, compression algorithms, traditional encoding, XML encoding, interoperability

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Executive Summary

Law enforcement, entities responsible for the production of identification cards, places of employment that require background checks and identity management organizations are examples of bodies that specify and deploy solutions which have the primary goal of determining the personal identity of a subject or verify the identity of a subject using biometric information: finger, face, iris, etc. To effectively exchange biometric data between various agencies using dissimilar systems made by different manufacturers, a standard is needed to specify a common format for the data exchange.

It is critical that agencies create an Application Profile which uses well established and widely accepted standards so that effective exchanges in the pursuit of agency-specific workflows utilizing biometric data can be facilitated.

1. Introduction

1.1 The intended audience of this guideline is anyone involved in biometric operations that are focused on using industry standard record formats for the management and exchange of biometric related data.

1.2 This document will focus on the facial components of ANSI/NIST-ITL and EBTS standards. Reading the referenced documents will illuminate how NIST and EBTS can be applied to other modalities: finger, iris, palm, voice, etc.

1.3 This guideline provides a beginner's overview of how the ANSI/NIST-ITL: **Data Format for the Interchange of Fingerprint, Facial & Other Biometric Information** as published by the National Institute of Standards and Technology (NIST) is used to form agency-specific implementations of Electronic Biometric Transmission Standards (EBTS).

1.4 An agency-specific EBTS specification is also referred to by ANSI/NIST-ITL as an ***Application Profile*** which allows organizations to specify the complete details of all fields within the ANSI/NIST-ITL standard which are mandatory or optional in their respective biometric operations. In this document the Criminal Justice Information Service (CJIS) EBTS Standard will be used to illustrate a specific instance of an Application Profile.

2. Referenced Documents

2.1 ANSI/NIST-ITL Standard
https://www.nist.gov/programs-projects/ansinist-itl-standard

2.2 ANSI/NIST-ITL Standard Profiles and Implementations
https://www.nist.gov/itl/iad/image-group/ansinist-itl-standard-profiles-and-implementations

2.3 History of ITL
https://www.nist.gov/itl/iad/image-group/ansinist-itl-standard-history

2.4 CJIS EBTS 11
https://fbibiospecs.fbi.gov/ebts-1/approved-ebts

2.5 Overview of 2011 Revisions to the Standard
https://www.aware.com/wp-content/uploads/2015/06/WP_ANSI-NIST.pdf

2.6 ASTM Standards
E2916 Terminology for Digital and Multimedia Evidence Examination.[1]

3. Terminology

3.1 *Definitions:*

3.1.1 ASCII : American Standard Code for Information Interchange
3.1.2 NIEM: National Information Exchange Model

4. Simple Relationship Diagram

4.1 Key takeaways from this document can be illustrated in Figure 1 in how ANSI/NIST-ITL and EBTS Agency Specifications create a layered approach to build a standard which supports a complete approach to an agency-specific exchange and usage of biometric data.

[1] For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@asstm.org. For Annual Book of ASTM Standards volume information, refer to the standard's Document Summary page on the ASTM website.

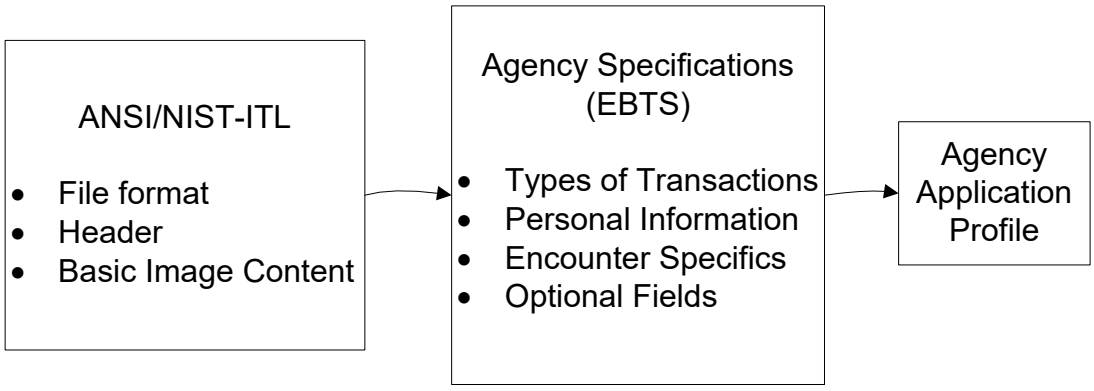


Figure 1: Linkage of Standards

4.2 ANSI/NIST-ITL key definitions:

- Basic record formats and structures
- Metadata describing the imagery
- Subject acquisition profiles (defines basic facial image quality)
- Size of biometric facial imagery
- Acceptable compression algorithms

4.3 Agency EBTS Specifications key definitions:

- Types of transaction (TOT): describes the type of encounter, the available data content in the file, the assumed action the file represents, and the response(s) which can result
- Textual metadata not defined by ANSI/NIST-ITL
- Error messages

4.4 Facial search workflow using CJIS EBTS 10 definitions:

- A facial image is captured at a local agency
- The facial image is packaged into an EBTS file with a type of transaction (TOT) of Facial Recognition Search (FRS). Demographics may be included in the EBTS file as defined by the Agency EBTS specification.
- The FRS EBTS files is sent to the Agency which does the facial search
- The search results are gathered
- The search results are packaged into an EBTS file with a type of transaction (TOT) of Search Result Biometric (SRB). Demographics may be included in the EBTS file as defined by the Agency EBTS specification. Another type of response could be an Error Transaction (ERRT) if there is an error in the facial search.
- The SRB EBTS file is sent to the Originator which captured the facial image
- The search results are reviewed by the Originator.

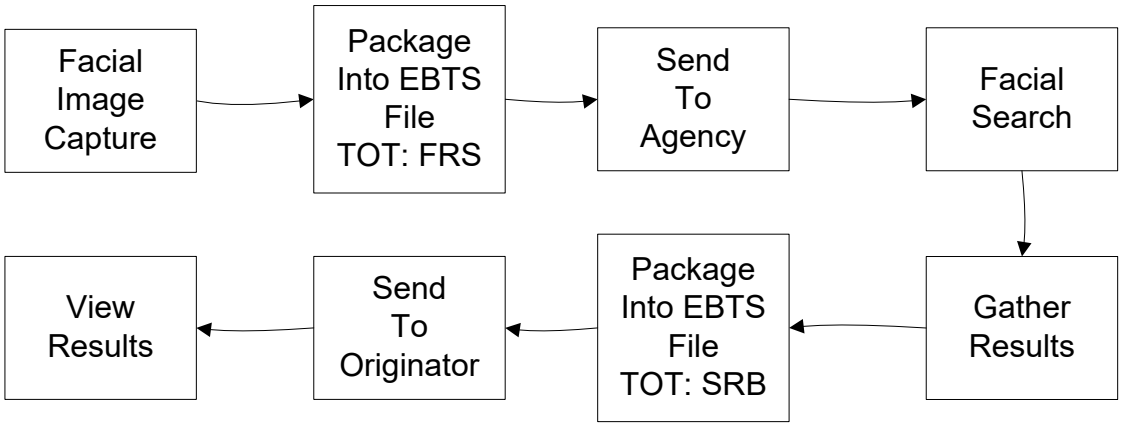


Figure 2: Generic Facial Search Workflow

5. Key Definitions and Terms

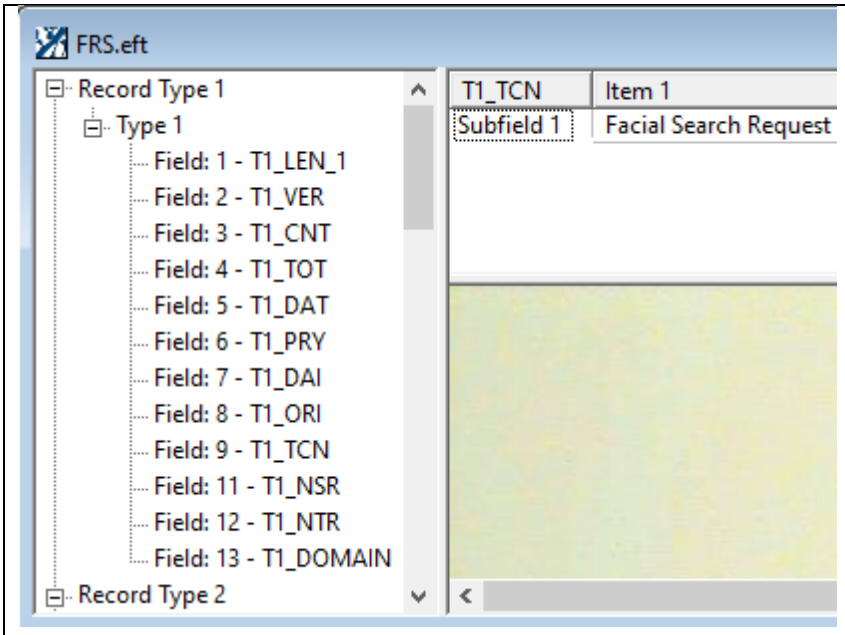
5.1 EBTS files for facial searches are comprised of different record types

- Each record type manages a specific set of textual or facial image-based contents.
- Each record is comprised of specific fields which are individually numbered and contain specific contents.
- Most fields are mandated and controlled by the ANSI/NIST-ITL standard while some fields can be agency defined.
- Fields can either be textual or contain binary image records.
- Acceptable binary image record formats are defined by the ANSI/NIST-ITL standard.

5.2 Type 1 record (Header)

- Transaction Management record
- All EBTS files must have a single Type 1 record followed by other records types (e.g. type 2 through 22) which contain transactional information
- All fields are textual
- Fields are conventionally referred to as “1.001”, “1.002”, “1.003”, etc. (Note that these are two numeric designators separated by a period and not a single value expressed as a decimal. Therefore, 1.1 is synonymous with 1.001. However, 1.1 is not synonymous with 1.10.)
- Key fields include:
  - VER: Version of the ITL file
  - CNT: Order and type of records in the EBTS file
  - DAT: Date of the EBTS file creation
  - ORI: Originating agency
  - TCN: Transaction control number
  - TOT: Type of Transaction. This field defines what the EBTS file is intended to include. For a facial search using CJIS EBTS this would be FRS which stands for “facial recognition search”.
  - DAI: Destination agency

- DOM: Version of the EBTS file (FBI-specific; other agencies have agency-specific fields)



Examples:

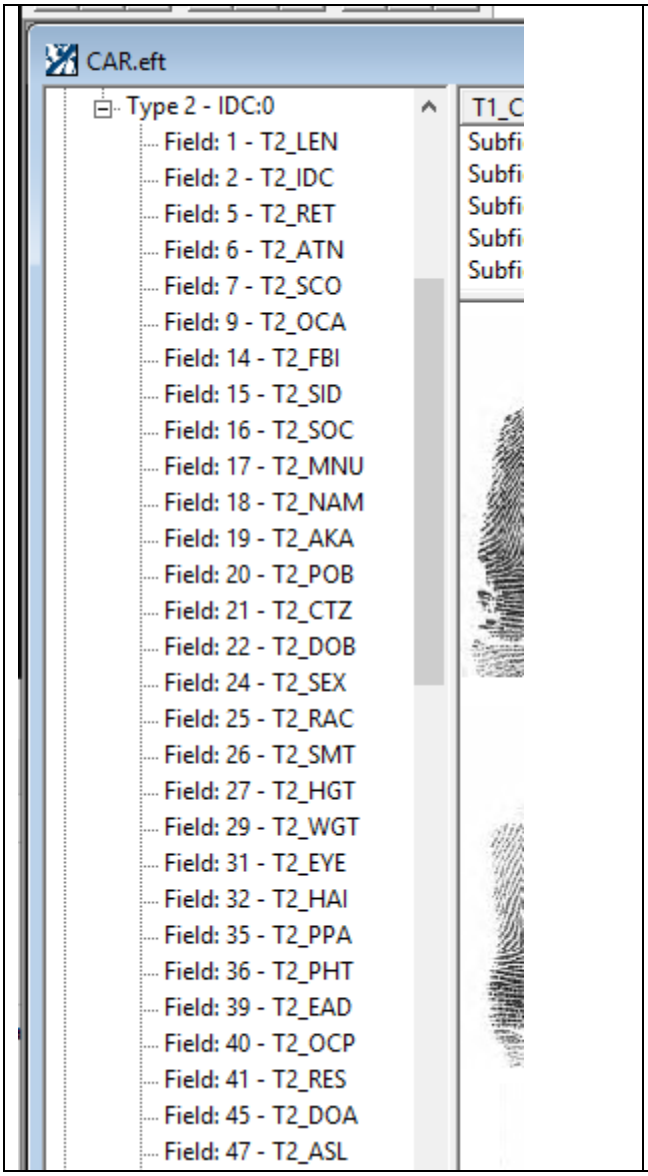
TOT: Type of Transaction
DAT: Date
PRY: Priority
ORI: Originating Agency
TCN: Transaction Control Number

Figure 3: Type 1 Record

5.3 Type 2 record (Person)

- Agency defined record for person and encounter-specific information
- All fields are textual
- Fields are conventionally referred to as "2.001", "2.002", "2.003", etc. (Note that these are two numeric designators separated by a period and not a single value expressed as a decimal. Therefore, 2.1 is synonymous with 2.001. However, 2.1 is not synonymous with 2.10.)

The Application Profile Type 2 record defines agency-specific information about the subject and context of the encounter.



Examples:

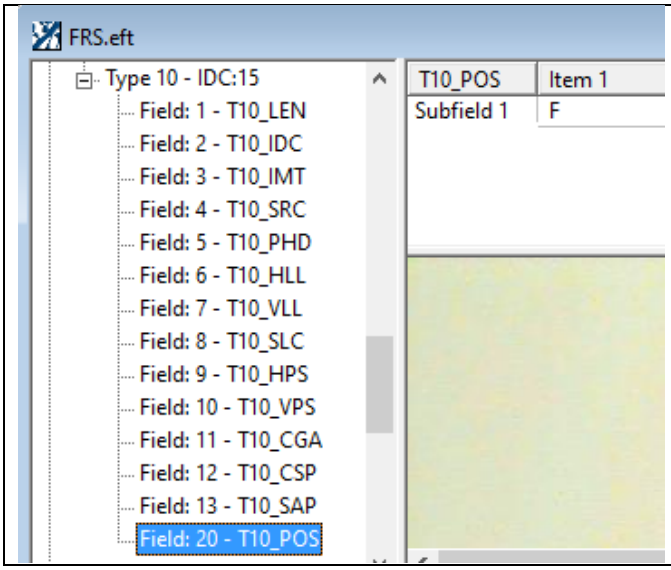
NAM: Full name
POB: Place of birth
SEX: Sex
CTZ: Citizenship
DOB: Date of birth
RAC: Race
HGT: Height
WGT: Weight
EYE: Eye color
HAI: Hair color
ASL: Arrest Segment Literal
DOA: Date of arrest
OCP: Occupation
DOA: Date of Arrest
ASL: Arrest Segment Literal

Figure 4: FBI EBTS Type 2 Record*

* This is an example of a Type 2 record, but it is FBI-specific; other Type 2 records may have a different appearance.

5.4 Type 10 records (Face)

- Contains facial, scars, marks, or tattoo (SMT), or other information related to body parts
- An EBTS file can contain multiple Type 10 records
- All fields are textual except the image portion
- Fields are conventionally referred to as "10.001", "10.002", "10.003", etc. (Note that these are two numeric designators separated by a period and not a single value expressed as a decimal. Therefore, 10.1 is synonymous with 10.001. However, 10.1 is not synonymous with 10.10.)
- The binary image record is field “10.999”



Examples:

IMT: Image Type (FACE)
SRC: Source ORI
PHD: Photo Date
HLL: Horizontal line length
VLL: Vertical line length
SAP: Subject Acquisition profile
POS: Pose (Frontal)

Figure 5: Type 10 Record Textual Contents

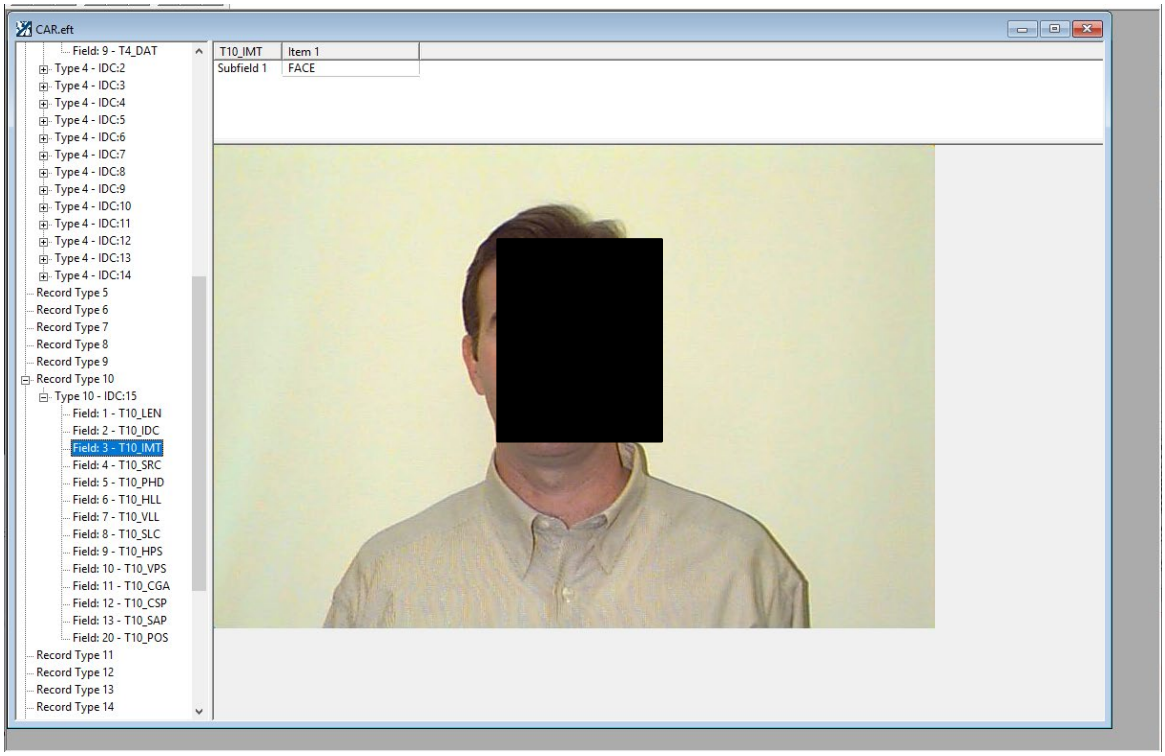


Figure 6: Type 10 Record Image Contents

6. ANSI/NIST-ITL Background

See the referenced URL:

https://www.nist.gov/programs-projects/ansinist-itl-standard

Key extracts from this URL:

Law enforcement and related criminal justice agencies, as well as identity management organizations, procure equipment and systems intended to facilitate the determination of the personal identity of a subject or verify the identity of a subject using biometric information. To effectively exchange identity data across jurisdictional lines or between dissimilar systems made by different manufacturers, a standard is needed to specify a common format for the data exchange.

Biometric data refers to a digital or analog representation of a behavioral or physical characteristic of an individual that can be used by an automated system to distinguish an individual as belonging to a subgroup of the entire population or in many cases, can be used to uniquely establish or verify the identity of a person (compared to a claimed or referenced identity). Biometric modalities specifically included in this standard are: fingerprints, plantars (footprints), palm prints, facial images, DNA and iris images. Identifying characteristics that may be used manually to establish or verify the identity of an individual are included in the standard. These identifying characteristics include scars, (needle) marks, tattoos, and certain characteristics of facial photos, iris images and images of other body parts. Latent friction ridge prints (fingerprint, palm print and plantars) are included in this standard and may be used in either an automated system or forensically (or both).

Some data may be stored and/or transmitted in original and/ or processed versions. The image or other data (such as a video or audio clip) may be ‘raw’ (as captured), compressed, cropped, or otherwise transformed. An example

of processed information is minutiae from friction ridge images. It is important, therefore, that descriptive information associated be transmitted to the receiving organization.

The Information Technology Laboratory (ITL) of the National Institute of Standards and Technology (NIST) led the development of this American National Standards Institute (ANSI) approved American National Standard using the NIST Canvass Method to demonstrate evidence of consensus.

7. ANSI/NIST-ITL Formal History

See the referenced URL:
https://www.nist.gov/itl/iad/image-group/ansinist-itl-standard-history

Key extracts from this URL:

ANSI/NIST-ITL Standard History

The first version of the standard, ANSI/NBS-ICST 1-1986 was published by NIST (formerly the National Bureau of Standards) in 1986. It was a minutiae-based standard. Revisions to the standard were made in 1993, 1997, 2000, and 2007. Updates to the standard are designed to be backward compatible, with new versions including additional biometric modalities and associated data. All of these versions use "Traditional" encoding.
In 2008, XML encoding of the standard was introduced, based upon the 2007 version. The 2007 and 2008 versions of the standard were designed to be the same except for the encoding. The XML encoding was developed using the naming conventions of the National Information Exchange Model (NIEM). Thus, this encoding is referred to as "NIEM-conformant XML."
In 2009, a minor supplement to the 2007 and 2008 versions was approved that extended the codes for friction ridge images to include multiple finger capture.
In November, 2011 a new version of the standard was approved. This version is focused on the content of the transmission, with encoding rules handled as annexes. Thus, there is no need for separate versions of the standard as was the case for 2007 (Traditional format) and 2008 (NIEM-conformant XML). The 2011 version of the standard also includes additional modalities (DNA and plantar) as well as the extended feature set (EFS) for Type-9 record; forensic image markups for face and iris; new metadata fields such as geoposition of sample collection; biometric data hashing; an information assurance record; associated context record; original source record and data handling logs; images of all body parts in the Type-10 record and more. Current plans are to extend the standard to include records types for voice recognition and dental forensics / bitemark analysis as well as an annex for conformity assessment.
In 2013, the standard was updated to *ANSI/NIST-ITL 1-2011: Update 2013*. The Forensic Dental and the Forensic and Investigatory Voice Supplements were approved.
In 2015, the standard was updated to *ANSI/NIST-ITL 1-2011: Update 2015*.

8. Subject Acquisition Profiles (SAP)

A subject acquisition profile is used to describe a set of characteristics concerning the capture of the biometric sample. Higher SAP levels relate to higher quality imagery.

Table 12 Subject acquisition profiles for face

Subject Acquisition Profile	SAP Level
Unknown acquisition profile [2015n>] or other source not mentioned in this table [<2015n]	0
Surveillance facial image	1
Driver's license image (AAMVA)	10
ANSI Full Frontal facial image (*ANSI 385*)	11
ANSI Token facial image (*ANSI 385*)	12
ISO Full Frontal facial image (*ISO/IEC 19794-5*)	13
ISO Token facial image (*ISO/IEC 19794-5*)	14
PIV facial image (*NIST SP 800-76*)	15
Legacy Mugshot	20
Best Practice Application – Level 30	30
Mobile ID Best Practice - Level 32	32
Best Practice Application – Level 40	40
Mobile ID Best Practice - Level 42	42
Best Practice Application – Level 50	50
Best Practice Application – Level 51	51
Mobile ID Best Practice - Level 52	52

Figure 7: ANSI/NIST-ITL Facial Subject Acquisition Profiles

9. Compression Algorithms

These are the compression algorithms acceptable to the standard. Note that compression algorithms are not applicable to every modality.

Table 19 Compression codes

Code	Label	Algorithm Name	Fidelity	Standard Used
0	NONE	Uncompressed	Lossless	NA
1	WSQ20	WSQ[59] (Wavelet Scalar Quantization)	Lossy	Version 3.1:2010
2	JPEGB	JPEG (Joint Photographic Experts Group)	Lossy	*ISO/IEC 10918, JFIF 1.02:1992*
3	JPEGL	JPEG	Lossless	*ISO/IEC 10918, JFIF 1.02:1992*
4	JP2	JPEG 2000	Lossy	*ISO 15444-1:2004*
5	JP2L	JPEG 2000	Lossless	*ISO 15444-1:2004*
6	PNG	PNG (Portable Network Graphics)	Lossless	*ISO/IEC 15948:2004*

Figure 8: ANSI/NIST-ITL Image Compression Codes

10. The Application Profile

Agencies create profile implementations based on ANSI/NIST-ITL specifications which define elements of an EBTS file for agency-specific purposes.

See the referenced URL for the latest CJIS Application Profile:
https://fbibiospecs.fbi.gov/ebts-1/approved-ebts

Key extracts include:

The FBI Criminal Justice Information Services Division is moving toward a system that will contain a complete biometric and biographic profile of the subject records in its databases. Although fingerprints will continue to be the FBI's primary mode of identification for the near future, the scope of the EBTS has been expanded over previous versions to include additional biometric modalities (e.g., palm print, facial, and iris) in recognition of the rapidly developing biometric identification industry. The American National Standards Institute /National Institute of Standards and Technology-Information Technology Laboratory 1-2011 standard (ANSI/NIST-ITL 1-2011) includes new record types to facilitate data sharing of new biometric modalities. Implementers should be aware that NIST has published an Errata for ITL 1-2011, correcting some errors in the Type-9 record. Integrating biometric data in accordance with the ANSI/NIST standard and subsequent Errata, the FBI EBTS provides a description of all requests and responses associated with electronic fingerprint and other biometric identification services.
The process of updating an FBI implementation of the ANSI/NIST-ITL 1-2011 standard involves many considerations as well as iterations of reviews and approvals. The EBTS is governed by the Advisory Policy Board (APB) process. Specifically, the Identification Services Subcommittee, Identification Services Coordination Group (ISCG), reviews drafts of the EBTS. This group provides comments, ranging from very specific to broad, to enhance the standard and provide opportunities for user feedback. The approval process takes into account the impact on legacy users, system contributors, and interoperability stakeholders, particularly when adding new information and changing functionalities. Changes to the EBTS require close coordination with users to articulate effects on programming, costs, business objectives, and other factors that need to be projected and reconciled accordingly.
EBTS v11.0 introduces the NGI Iris Service in Appendix S: Descriptors and Field Edit Specifications for Type-17 Logical Records. Future updates to EBTS 11.0 will be completed through Technical and Operational Updates (TOUs) and will be fully incorporated directly into the EBTS, with previous versions moved into the

archive. In addition, a redline excerpt of the changes associated with the most recent TOU are provided for quick reference. Changes to the document are either deletions or insertions. Both are identified in red text and/or strikethrough font. All comments to this standard may be submitted via this website.

Note the defined types of transactions supported:

There are several types of electronic fingerprint identification submissions that will be accepted by the FBI/CJIS. The particular type of submission is identified in the Type of Transaction (TOT) field in the Type-1 record for each transaction. The following are the TOTs for identification submissions:

TOT TRANSACTION

CAR Criminal Tenprint Submission (Answer Required)
CNA Criminal Tenprint Submission (No Answer Necessary)
CPDR Criminal Fingerprint Direct Route
CPNU Criminal Fingerprint Processing Non-Urgent
DOCE Departmental Order Channeling Electronic
EMUF Electronic In/Manual Out User Fee Submission
FANC Federal Applicant (No Charge)
FAUF Federal Applicant User Fee
FIDR Foreign Information Direct Route
FNDR Federal No Charge Direct Route
NNDR Non-Federal No Charge Direct Route
NFUE Non-Federal User Fee Expedite
NFUF Non-Federal Applicant User Fee
MAP Miscellaneous Applicant Civil
DEK Known Deceased
DEU Unknown Deceased
MPR Missing Person
AMN Amnesia Victim

FBI/CJIS's responses to electronic submissions will provide search results or indicate an error via the following TOTs:

TOT RESPONSE TRANSACTION

SRE Submission Results - Electronic
ERRT Tenprint Transaction Error

11. Worldwide Application Profiles

There are many countries which have adopted their own Application Profiles based on NIST specifications which define their specific elements in an EBTS file for agency-specific purposes.

See the referenced URL for a list of these countries:
https://www.nist.gov/itl/iad/image-group/ansinist-itl-standard-profiles-and-implementations

12. Traditional Encoding Examples

In the 2008 Revision of ANSI/NIST-ITL an XML encoding was introduced which could be used instead of the traditional binary encoding. Part 1 of this standard, previously published in 2007, updated the based standard, while Part 2 of this standard, published in 2008, introduced the XML encoding.

NIST Special Publication 500-271 Information Technology: American National Standard for Information Systems— Data Format for the Interchange of Fingerprint Facial, & Other Biometric Information – Part 1 ANSI/NIST-ITL 1-2007 Revision of ANSI/NIST-ITL 1-2000 https://tsapps.nist.gov/publication/get_pdf.cfm?pub_id=51174
NIST Special Publication 500-275 ANSI/NIST-ITL 2-2008 XML Version of ANSI/NIST-ITL 1-2007 Information Technology: American National Standard for Information Systems— Data Format for the Interchange of Fingerprint Facial, & Other Biometric Information – Part 2: XML Version https://tsapps.nist.gov/publication/get_pdf.cfm?pub_id=890062

Key extracts from Part 1 include:

The document that follows is the conventional ANSI/NIST standard, now known as Part 1. Part 2 will be the Extensible Markup Language (XML) version of Part 1 and is currently being developed.
Over the past several years, many data interchange and processing applications have converted to or are in the process of migrating toward an XML format approach for processing data. In order to provide the ability to directly interface with such applications, an XML alternative representation of the textual, image, and other biometric information is being developed. Part 2 of this standard will contain the XML alternative for the conventional ANSI/NIST standard. The goal of Part 2 will be to describe a “one-to-one” correspondence of XML elements to the numerically tagged conventional elements described in Part 1. The sub-elements (separated by the US and RS characters in the conventional representation) are given XML counterparts in Part 2.

Key extracts from Part 2 include:

This document contains the Extensible Markup Language (XML) version, or Part 2. Over the past several years, many data interchange and processing applications have converted to or are in the process of migrating toward an XML format approach for processing data. In order to provide the ability to directly interface with such applications, this XML alternative representation of the textual, image, and other biometric information has been developed. A goal of Part 2 of this standard is to describe a “one-to-one” correspondence of XML elements to the numerically tagged conventional fields described in Part 1. Another goal is to define an XML representation that conforms to the National Information Exchange Model (NIEM), which enables interoperability for information sharing among multiple government agencies
National Information Exchange Model, NIEM Version 2.0, July 2007, http://www.niem.gov .

12.1 Traditional Encoding Example

Key items:

- All textual items are referenced as tag – value pairs
- All textual items are separated by non-printable characters
- Images are stored in native binary formats
- File size is compact
- An example of a Type 1 record is shown in yellow and a Type 2 record is shown in green. You can make out the contents but the non-printable field delimiters obscure the contents.

1.01:2531.02:04001.03:120-200-401-402-403-404-405-406-407-408-409-410-411-412-413-414-1015-1516-1517-1718-17191.04:CAR1.05:201006211.06:41.07:DCFBIWA6Z1.08:NY03030001.09:12345678901.11:20.001.12:20.001.13:NORAMEBTS 10.0

2.001:8072.002:002.005:Y2.006:SA J Q DOE,RM 118672.007:NY030025P2.009:Q8803124652.014:62760NY122.015:NY123456782.016:2205658552.017:PP-1234567890P2.018:JONES,ANTHONY P2.019:JONES,TONY-JONES,A P2.020:VA2.021:US2.022:197908152.024:M2.025:W2.026:MISS L TOE2.027:6012.029:1822.031:BLU2.032:BRO2.035:Y2.036:Y2.039:ACE CONSTRUCTION COMPANY,327 MAPLE AVE, BUFFALO,NY2.040:PLUMBER2.041:5021 OAK LEAF DRIVE, BUFFALO NY, USA.,199709252.045:199503242.047:19940919DUI-19940920POSSESSION OF FIREARMS2.051:19940930DUIUS>5 DAYS JAIL, PAY COURT COSTSCONVICTED-19940930POSSESSION OF FIREARMS10 DAYS JAIL, PAY COURT COSTS, $50CONVICTED2.054:199609302.055:RELEASED BY COURT ORDER,199409302.056:ARMED AND DANGEROUS2.067:DBI1134123452.070:Y2.073:NY03030002.084:03XX-09UP2.087:Y

12.2 XML Encoding Example

Key items:

- All textual items are referenced as named elements
- The XML Mapping table provided in the XML Information Exchange Package Documentation (IEPD) lists the ITL Field Numbers and mnemonics with their corresponding XML representation. (Note that minimum and maximum occurrences may be different but equivalent.)
- All contents are presented as printable characters
- Images are stored in uuencoded formats
- File size is large
- An example of a Type 1 record is shown in yellow and a Type 2 record is shown in green. This encoding directly exposes the fields and their contents


```
<itl:NISTBiometricInformationExchangePackage xmlns:ansi-nist="http://niem.gov/niem/biometrics/1.0"
xmlns:biom="http://niem.gov/niem/biometrics/1.0" xmlns:ebts="http://cjis.fbi.gov/fbi_ebts/10.0"
xmlns:itl="http://biometrics.nist.gov/standard/2011" xmlns:j="http://niem.gov/niem/domains/jxdm/4.1"
xmlns:nc="http://niem.gov/niem/niem-core/2.0" xmlns:s="http://niem.gov/niem/structures/2.0"
xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
 <itl:PackageInformationRecord>
  <biom:RecordCategoryCode>01</biom:RecordCategoryCode>
```

```
 <biom:Transaction>
  <biom:TransactionDate>
   <nc:Date>2010-06-21</nc:Date>
  </biom:TransactionDate>
  <biom:TransactionDestinationOrganization>
   <nc:OrganizationIdentification>
    <nc:IdentificationID>DCFBIWA6Z</nc:IdentificationID>
   </nc:OrganizationIdentification>
  </biom:TransactionDestinationOrganization>
  <biom:TransactionOriginatingOrganization>
   <nc:OrganizationIdentification>
    <nc:IdentificationID>NY0303000</nc:IdentificationID>
```

```
<itl:PackageDescriptiveTextRecord>
 <biom:RecordCategoryCode>02</biom:RecordCategoryCode>
 <biom:ImageReferenceIdentification>
  <nc:IdentificationID>00</nc:IdentificationID>
 </biom:ImageReferenceIdentification>
 <itl:UserDefinedDescriptiveDetail>
  <ebts:DomainDefinedDescriptiveFields>
   <biom:RecordRetentionIndicator>true</biom:RecordRetentionIndicator>
   <biom:RecordForwardOrganizations>
    <nc:OrganizationIdentification>
     <nc:IdentificationID>NY030025P</nc:IdentificationID>
    </nc:OrganizationIdentification>
   </biom:RecordForwardOrganizations>
   <biom:RecordRapSheetRequestIndicator>true</biom:RecordRapSheetRequestIndicator>
   <nc:CaveatText>SA J Q DOE,RM 11867</nc:CaveatText>
   <ebts:RecordImageCaptureDetail>
    <biom:CaptureDeviceMakeText>DBI</biom:CaptureDeviceMakeText>
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   <ebts:RecordTransactionActivity>
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    <ebts:CriminalCycle>
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      </ebts:OffenseDate>

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    </nc:EmploymentLocation>
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  </ebts:DomainDefinedDescriptiveFields>
 </itl:UserDefinedDescriptiveDetail>
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