

**HSPD-12 Public Meeting
Technology and Privacy**

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Identity Management Task Group**

I'm industry. I'm evil. I'm representing a trade association. There are 400 companies participating in the Identity Management Task Group. We want a more secure environment for federal workers and believe it is key to put policy in place before technology.

The issues of security as it relates to privacy is my focus. Technology questions related to security need to be addressed as it relates to policy, not technology. Not how to do it, but what to do, is the question.

Security is the enabler of privacy. Decision to add more security may increase privacy solutions.

The proposed standards do not include sufficient level of detail to allow industry to make any substantial assessment. Policy on whether contact or contact-less chip should be used has not been established.

Industry has been building solutions with government for many years. Given timelines and level of detail required, a cooperative effort between government and private industry is necessary.

The issue is not whether technology exists but whether technology supports policy. Many elements need to be addressed: information capture retention, biometrics, image vs templates, centralization, contact vs contact-less, etc.

Without policies, I cannot answer questions about technology. It's not a "does technology exist question" but "how do you want to use the technology". The industry around smart cards has evolved exponentially over the last few years. Technology can support just about anything but policy has not been established.

Credentialing is a multi-step process. These processes are just now being put in widespread use.

We have to design a card where data on the card is not being kept in other places. HSPD-12 has aggressive timelines especially since technology is being designed without policies in place.