Submitted by: _____

Date: _____

Cmt #	Organization	Point of Contact	Comment Type (G-General, E-Editorial, T-Technical)	Section,Annex,etc and Page Nbr	Comment(Include rationale for comment)
1	Argonne National Laboratory. Also representing SLCCC, the committee of CIOs of the National Laboratories.	Remy Evard, evard@anl.gov	G	Overall	The proposed PIV system describes how employees and contractors of the federal government would attain PIV cards, but has no mechanism for non-employees and non-contractors to acquire cards, and would be a particular challenge to those who do not physically appear at the laboratory. In order to fulfill their research and facility missions, the Department of Energy laboratories operate scientific user facilities for use by non-federal and non-contractor employees and participate in collaborations that include researchers outside of the federal government. Many of the labs have as many non-employee and non-contractor visitors, collaborators and users conducting work on-site and on the computing systems along side employees. In addition, a sizable fraction of the collaborators and users accessing the data and computational resources never physically come on-site to the labs.
2	Argonne National Laboratory. Also representing SLCCC, the committee of CIOs of the National Laboratories.	Remy Evard, evard@anl.gov	G / T	Overall	No method of using the PIV card for access to computers beyond the directly attached machine is described. A researcher may need to delegate the right to authenticate to a service so that some essential step can be completed without direct intervention, such as the ability to run a parallel simulation across a thousand processors without typing a PIN a thousand times

D = Document,1 = FIPS201, 2 = SP800-73
T=Type of Comment, E = editoral, T = technical

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3	Argonne National Laboratory. Also representing SLCCC, the committee of CIOs of the National Laboratories.	Remy Evard, evard@anl.gov	G / T	Overall	In common networking and collaboration interactions, users are only one of the concerns. Devices, hosts, and services also need to be identified securely for mutual authentications. This does not appear to be addressed.
4	Argonne National Laboratory. Also representing SLCCC, the committee of CIOs of the National Laboratories.	Remy Evard, evard@anl.gov	G / T	Overall	Many laboratories have significant deployments of credential and directory systems supporting the day-to-day use of the entire Laboratory workforce and collaborative community. There is no information on how the PIV standard will interoperate with or replace these.
5	Argonne National Laboratory. Also representing SLCCC, the committee of CIOs of the National Laboratories.	Remy Evard, evard@anl.gov	G / T	Overall	The aggressive timeframe for the rollout of the PIV increases the odds that essential design flaws will not be detected in advance of widespread deployment. For example, from the specification, it appears that a PIV card may be vulnerable to a compromised PIV card reader.

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Proposed change
Expand the card acquisition and assignment mechanisms to include ability to issue cards to non-federal employees, non-federal contractors, and to foreign nationals. Modify the card issuing procedures to be more accomodating to people not located at federal facilities.
Clarify the use of the PIV card in its role as a means of authenticating to a set of federated resources.

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Proposed change
If the PIV system is intended to replace other authentication systems at some point in time, it must have their degree of sophistication in order to support modern multi-system interactions.
Clarify the interaction between the PIV and other authentication mechanisms such as Kerberos, Grid PKI solutions, SSH key management schemes, and so on.
Specify mechanisms to fully test the system and mechanisms to quickly and economically recover from potentially major system design flaws.

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