



BOARD OF GOVERNORS  
OF THE  
**FEDERAL RESERVE SYSTEM**  
WASHINGTON, D. C. 20551

STEPHEN R. MALPHRUS  
STAFF DIRECTOR FOR MANAGEMENT

December 22, 2004

Mr. W. Curtis Barker, Project Manager  
Computer Security Resource Center  
NIST  
100 Bureau Drive  
Gaithersburg, Maryland

Re: Comments on Public Draft FIPS 201 NIST

Dear Mr. Barker:

The Federal Reserve Board has reviewed the latest public draft of Federal Information Processing Standard (FIPS) 201 Personal Identity Verification (PIV) for Federal Employees and Contractors.

As you may know, the Federal Reserve Board is a unique institution due in part to the independence that was granted under provisions of the Federal Reserve Act to control its obligations and expenditures, its buildings including access, and its terms of employment. FIPS 201 imposes specific personnel screening requirements, acquisition policies, access controls for buildings, and other requirements generally applicable to government agencies. The Board is studying how these standards may apply. Apart from this issue, the Board is reviewing FIPS 201 to determine what changes, if any, may be appropriate for the Board to further the common goal of protecting our nation's critical infrastructure.

Some comments are identified by section numbers within the document (Attachment 1). Others are general comments on the compliance complexities the Federal Reserve Board will face if we adopt the standards (Attachment 2). These comments are not ranked by importance.

Sincerely,

*Stephen R. Malphrus (signed)*

Attachments