



Biometric Industry Considerations

*Quality Identity and Privilege Credential Products for the Transportation
Worker Identification Credential (TWIC) and other DHS/TSA Programs
Qualified Product Lists (QPL) Workshop
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International Biometric Industry Association

- Non-profit trade association founded in 1998
- Based in Washington, DC
- Supports growth in the biometrics industry through education and advocacy programs
- Represents biometric manufacturers, developers, solution providers, integrators and consultants
- Impartially represents all biometric technologies

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Background

- IBIA members are manufacturers of fixed and portable biometric/smart card reader devices used for TWIC, PIV and other applications
- IBIA members appreciate the opportunity to provide comments for consideration by NIST and DHS in planning for an on-going program of product certification
- Following is a summary of the comments raised by IBIA members

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Modularize Testing

- Reduce the direct and indirect cost of manufacturer participation by modularizing the testing process
- Create one certification for elements that are common between programs
 - Example: FIPS 140-2, matching algorithms, etc.
- Require program-related testing only on unique elements not previously tested

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Provide Reciprocity

- Once an accredited lab has certified a common element, other labs should accept this certification without re-testing

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Publish a Compliance Matrix

- Publish a “matrix” of tested features that can be checked off
- Many features are optional
 - May choose to implement limited functions
 - Example: Indoor vs. outdoor operation, magnetic stripe read + contactless vs. contact only, etc.
- Helps inform the buyer and reduces procurement cost by not paying for unneeded functions/features

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Consider Alternatives to Human Subject Testing of Biometrics

- Human subject testing is desirable and can demonstrate that a system functions as intended
- However, it can be very expensive
- Also, small human subject sample size may not provide a statistically valid indication of biometric performance
- Technology testing can “imply” comparative performance in the field between different manufacturer s biometric algorithms
Example: NIST MINEX
- Recognize previously completed human subject testing if performed by accredited lab

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Establish Clear Policy for Product Changes

- Use common sense to avoid an entire “do-over” if the changes are minor
- A policy could be established as follows:
 - Manufacturer submits detailed description of product change and expected impact
 - Testing authority subject matter expert reviews submission and makes determination
 - Changes to color or model number would only require administrative action
 - Change to specific module would require “incremental” re-certification
 - Review could also result in complete re-submission

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Support Manufacturer Pre-certification

- Provide a mechanism that allows a manufacturer to effectively “pre-certify” a product prior to submission
- Reduces costly re-testing by getting it right the first time
- Requires clearly defined test scripts
- Requires pre-certification tools
 - Example: “Gold” test cards that demonstrate normal behavior and stress the device by introducing errors

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Provide Process for Manufacturer Redress

- Provide a redress process whereby a manufacturer is given the opportunity to correct compliance issues without requiring a complete “do-over”

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Don't Require Testing of Optional Functions

- Tailor testing to fit the manufacturer's claims of functions that they intend to support
 - Test for all mandatory functions
 - Allow testing of optional functions only if claimed
 - Example: Don't require testing of Wiegand protocol output if not mandatory or claimed by the manufacturer

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Questions?

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