INCITS comments on Biometric Identity Assurance Services (BIAS) SOAP Profile, Version 1.0 Working Draft 07 27 November 2008		Date: 02/27//2009	Submitter: **C. Tilton**

1	2	(3)	4	5	(6)	(7)
Cmt No.	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com-ment[1]	Comment (justification for change) by the MB	Proposed change by the MB	Proposed Editors Disposition
INCIT S-1	3.2.10	Page 16, Line 209	Tm	It may not be prudent to specify versions directly in the standard. They are continuously updated. For example, EFTS is superseded by FBI EBTS and the DoD EBTS is moving to version 2.0 In addition, consider adding INT-I. As a general concern, how does the fact that ANSI/NIST-ITL 2-2008 exists affect things? It is the XML version of the ANSI/NIST standard. EBTS and others application profiles will be modified to handled this standard in the future. Does this mean a substantive update to BIAS?		
INCIT S-2	3.2.10		Tm	There are very few specifics on biographic data in the document. If this is proposed as an international standard, certain data should be required to limit the need to customize messages for each country. A true international standard would save time and money as we work with other countries.		
INCIT S-3	3.2.21	Page 20, Line 223	TM	Change fields unspecified and XML_BIR to Format and BIR_Info	Rather than having an unspecified format or XML_BIR, it would make sense to have the format of the data as a field and then the representation as a subsequent field.	
INCIT S-4	3.2.21	Page 20, Line 223	TM	1) Increase flexibility of biometric data elements as follows: a. Allow either a full BIR or just a BDB. - This may require an element (or tag) to indicate which it is. - If a BDB only is provided, the BIAS CBEFF XML header may be used to provide metadata. b. Allow non-binary BIRs/BDBs. - Currently, data is carried just as binary BIRs. There are a number of XML data formats now available (e.g., VoiceXML, ANSI/NIST part 2, NIEM). These should be allowed to be carried in their native XML format rather than requiring the entire record to be base 64 encoded. c. Allow a URI to be provided as a BIR/BDB (rather than just embedded/attached data). 2) It is recognized that these changes, if accepted, may		

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				require changes to the INCITS-442 base standard. As this standard is currently in revision, this should also be considered a contribution towards that project and forwarded to M1.2 accordingly for discussion at the April meeting.		

INCITS-5	3.2.22	Page 20, Line 224	Tm	The reference in 3.2.22 CBEFF_XML_BIR_Type states: This schema represents CBEFF data elements from both the US (INCITS 398-2005 Revision 1) and International (ISO/IEC 19785-1:2006) versions of the CBEFF standard. We do not believe that the INCITS version should be referenced.	Change here and in the XML listing on Pg 124, below:
					
					`<xsd:complexType"name="CBEFF_XML_BIR_Type">"`
					`"""""""""<xsd:annotation>"`
					1460
					`"""""""""""<xsd:documentation>"`
					1461
					`"""""""""""""An"XML"representation"for"biometric"information."This"schema"`
					1462
					`"""""""""""""represents"CBEFF"data"elements"from"both"the"US"`
					1463
					`"""""""""""""(INCITS"398!2005"Revision"1)"and"International"`
					1464
					`"""""""""""""(ISO/IEC"19785!1:2006)"versions"of"the"CBEFF"standard."The"data"`
					1465
					`"""""""""""""elements"in"the"two"standards"are"fairly"similar."However,"a"data"`
					1466
					`"""""""""""""element"may"have"a"different"meaning"and/or"a"different"set"of"`
					1467
					`"""""""""""""valid"values"based"on"which"standard"is"used."The"cbeff!version"`
					1468
					`"""""""""""""data"element"specifies"whether"the"US"or"International"version"is"`
					1469
					`"""""""""""""being"used."An"additional"data"element,"other,"has"been"added"to"`
					1470
					`"""""""""""""this"schema"to"capture"non!standard"information"and"to"allow"for"`
					1471
					`"""""""""""""flexibility"to"any"future"changes"in"the"existing"CBEFF"standards."`
					1472	

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					"""""""""""""For"a"description"or"definition"of"each"data"element,"see"the" 1473 """""""""""""referenced"CBEFF"standards." 1474	
INCITS-6	3.2.29	Page 22, Line 231	Tm	Remove BIASOperationName from GenericRequestParameters	The first element in all the SOAP body messages contains the operation name, i.e. "CreateSubjectRequest". Having a field specifically for also storing "CreateSubject" is unnecessary overhead.	
INCITS-7	3.3.1.4	Page 30, Line 290	TM	Remove optional parameter subject ID.	Should not allow sources other than the system to specify Subject ID. Causes unnecessary complexity in assuring multiple clients don't attempt to use the same Subject ID.	
INCITS-8	3.3.1.17/18, 3.3.1.20/21	Pg 52,54,57,58, Line 468	TM	Remove ability for SetBiographicData/SetBiometricData to update data.	UpdateBiographicData / UpdateBiometricData already designed to update, allowing SetXX to update as well adds complexity.	
INCITS-9	4.2	Page 73, Line 595	Tm	Is it possible to identify another type of Async call that uses callback model?		
INCITS-10			Tm	Does BIAS enable capturing document data? If so, how much customization [of a system] would be required to enable updating of document status?		
INCITS-11			ed	Running spell check would help also.	Correct spelling errors.	

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