This little session has been organized by Ms. Judy, so you are on.

I asked a few people to join me up here. May I know who they are? Dave, Bob. Where is Bob. You know they always leave when they know the hard questions are coming. Experience tells.

Just give us a moment, Bob, I think he is out.

While we were waiting for Bob, let me kind of elucidate little bit on some of the stuff that was said earlier. The handbook is there for people to use. It is supposed to be a resource to help us through all this. As Ralph correctly said, there is pieces that are not finished yet and we do have a time line when we expect those pieces to be finished and as soon as they are, we want to include them in the handbook. There is conformance testing, for instance, we are currently working on completing the reference implementation there will actually be two. There will be, if you are familiar at all with 800-73, was there a session on 800-73 this morning?. Okay, so you all know about part 2 and part 3 and I apologize for not being here this morning, but I will explain in a moment why not?. I feel you will get time to do this because Ralph finished early, so we got plenty of time. I think you will get out of here early today, which will be a good thing, but there is two parts to that, part 2 and part 3, right, so we need a **1.39___** on part 2. Unfortunately, we have one that is almost complete because we are working on _____ 2.1 when all this came along and as you know sort of derailed us a bit, but we actually have that pretty much package and way to go and so it does not require much modification to bring it up to snuff as a ______ for part 2 of 800-73. We do need to prepare a _____ for part 3 and that is in fact on the way at the moment. I happened to know the folks that are driving that and working diligently on that. Once we have a _____, we can get to the Conformance Test Suites and that is actually also being worked on. Once we have those, then we can start accepting products and so we are really hoping that by the end of this summer, we will be able to be in that position. We will actually have some labs identified and at least for part 2 of 800-73, will be ready to start accepting products, okay. Part 3 is a little bit more, you know, complex. Another thing that we are doing and in order to try and ease everybody's path through this is, is that for those products that also need 140-2 certification. We are working negotiating with the CMVP labs to include the FIPS 201 requirements as an addendum to the 140-2 requirement, so you actually will only have to put the thing through the process once, instead of going to the CMVP labs and doing 140 compliance and then having to go somewhere else for 201 compliance. We want to identify those things that need to be done and of course that really only applies to accept the smart cards, but nevertheless, you know, if you are not a smart card vendor, I hope that sounds like good news to you. As opposed to right, do that and then go over and do that and then go over and do the other thing and we will go. Okay so there is one more thing and the reason I was not here this morning and I do apologize for not being here this morning, I really wanted to be, but I had previous to this actually getting set as a workshop for these two days. I had another meeting set that I really could not move and what we are doing this morning all morning, my eyes are watering now, is we were try to pull out of the FIPS, a set of criteria for enrollment because you have to self certify for the October time frame that you are compliant with the enrollment process and I could give each of you the FIPS and I said go certify that you are compliant and I have a feeling that if I gave 10 of you the FIPS we will have 11 different opinions on what compliance was and so what we are trying to do is actually spell out for you a set of minimum criteria and we are working right now to do that, it will go out to the _____ committee for review, comment, etc and then we will put it out in one way or another and at this point I don't know exactly how until I actually have it in hand and the FIPS has had a chance to look at it and we have gotten it all together. We will get it out in one form or another for you to use, so that there will be some consistency in this process. I remember when we went into this, almost two years ago now when we first started this because we actually precede HSPD 12 by quite a bit, I think it is two years, I think it was April of 2003. You know smart cards and PKI sound like a great idea and it was Jim Hawk who raised his hand and said, "I don't care unless you get the enrollment process stabilized or standardized. I am never going to trust you." I think those were his exact words, may be it was not Jim Hawk, may be some guy who just looked like Jim Hawk, I don't know. All right, so what I have got up here today is I have the draft implementation plan, or it an agency template. It is actually the document that you saw and reviewed and commented on last month of March whenever it was, I think it was March. So what I want to do is, I want to work through it because I have had a sneak peak at the document that has gone into the OMB clearance process. Now, the OMB clearance process, some of you know is somewhat convoluted, and so things could happen to it as it goes through that process. You know, somebody could not like that word or could not like that bit and you know that whole section and so things could change, but what went in looked very much like we had out for comment with a few, I thought, excellent changes tweaks if you will, that is just really typed in the document up beautifully. I really liked the look of it, but we can't use that one because it's the one that's in the OMB clearance process unfortunately and so I have to use the last official thing that was out for public comment, but actually because they are so similar, I really think that this is a worthwhile exercise for us to go through.

So what I have done is, I have basically just broken the document up, tried to make it big enough that you can all read it. Can the back of the room read that?. I mean, some of Ralph's things that he put up were actually eye charts from the front row, so you know, the rest of you are probably going okay, but then again I am half line, but I tried to draw this up big enough and we are just going to work through it. What I have got is I have got this august group up here and I am going to ask them to tell us what their interpretation of these requirements are and how they are going to respond and then I invite you to give us feedback on this as well. If you have right now, don't wait till we get to the end to ask questions, if you got something to say about a particular section. Now, telling me that a question is bogus is not going to help us much, I am afraid. I can certainly explain to you why that question is in there if that's your question, but telling me its bogus, that part has already been done in the comment period and may be that question was removed, I don't know. I know a lot of questions were tightened up, but basically general information that is pretty self explanatory I think except for the fact that agency HSPD 12 point of contact. This is the person in your agency that is responsible for implementation for your agency, somebody said I have like 20 bureaus, 9 bureaus, 8, 13, it was something like that lots. It is at your departmental level, it's the top down guy and this is actually going to be the person probably who affixes his name at the end. The offer actually this HSPD 12 point of contact and the person who signs their name at the end, they are responsible for the content, so internal to your agency, you may want to identify who the author is, but as far as OMB is concerned, they just want to know who they are going to return to when they have questions or concerns about what's in this document and that should be the person that you are signing as your responsible party. I don't know where these people are coming from. My question would be where in the agency are we assigning this?.

Our particular agency DOI is going to go through the office of Law Enforcement and Security. The office of Law Enforcement and Security is going to be handled in the Department of _____. You look these soft-spoken man. I believe you could hear me without a mike, but anyway.

Basically, in the state of ours probably going to follow the Bureau of diplomatic security. However, since we have the CIO overseas the PKI. We may have to elevate this upto our under secretary for management.

At the movement we are looking at the office of information technology, that we may have to get up on that.

There you go? You choose, it looks like can be in IT or physical security or even possibly higher in the agency. Needs to be higher? CFO or COO. It is easy for you say Lou you come from a small agency.

The policy letters will come from those higher levels, but there will not be policy people who are the senior if you were managers that will be dealing with OMB staff. So again, this is the point of contact for clarification of _____ versus the secretarial staff.

Now here is the point, you might want to take away when this comes out. It is going to come out form OMB under a letter a memo to your heads of agency. So it is actually going to come to your department head or your agency head whoever that may be for us that would be the administrative GSA. So, if you feel that this should be under your purview you may want to push that up the line so that you know the agency knows who to hand it to seriously.

I have had a few questions about the June 27 deadline and what the chances of it, that it might slip. Well, obviously I am not inside the mind of OMB fortunately. The date is his set by the Homeline Security presidential directive. I got a really gut feeling that there is not much anyway it is the date.

The time line, the time line looks a little bit confusing. Compliance with part I, PIV I. If you look at the FIPS or for that matter the guidance, the draft guidance you will see that October of 2005 is what it says, right? But, if you read further into the draft guidance you will see that for full compliance in other words making sure all your current employees have the ____ file and everything has been back filled. Currently, this is September 2007 date. So what we are talking about here under this planned date for compliance under the time line is full compliance. When you will be done? When PIV I will be completely done and the enrolment process will be just, that is the enrollment process. I suppose to got this new enrolment process. Judy should not be changed then, that wording they do not buy. It might be and I am not 100% sure if that wording has been changed because otherwise I do not even know why we are asking the question October 2005, though. Unless your Legacy Agency in which she is going to ask for something different. You may yeah, but again if OMB I should not use names. OMP has given us till 2007 according to the draft guidance.

Does it make sense that actually put in a draft that date? This must be done by within the documents so people don't have to guess. Unfortunately, the document has already been forwarded. We cannot change the actual way the document is written, all we may be able to do is put out some fixed sponsored supplemental guidance. I will have to talk to Janet and ask whether or not we can do that. You have to stand up old man. You are getting your exercise today.

This is my punishment. On that date, they were talking about October 2007, I was of the impression that, that is when we have to have everyone badged. It does not say any place and the guidance that we have to use those cards for access by 2007. No it is not 2000. There is no date. Is there a 2007 date? No, the September 2007 was for the identity proofing of all. It is the enrollment process. It is PIV I only. It says by September of 2007, you must have all your current employees NAC, etc, etc, etc. If you look in the covering draft of the guidance down embedded in the guidance where it was talking about PIV I. She says that by October 2005, you must have the process in place. All right. So, anybody knew that you NAC starting October 2005 has to be NAC'ed under FIPS 201. I just made it verb. Okay, I have created a new verb. Yes, I know. But then again Shakespeare brought 3000 words to the language, so I am in good company. I told you I would get English literature in here sometime during the two days. However, on October 27, 2005 is when you must have the new process in place and you must be starting and the reason I keep saying, according to the current draft because until OMB actually stamps it final anything can happen. But, according to the current draft, you must have all of your current employees retrofitted into the new guidance by September of 2007, so in other words they do not expect us between now and this October to have gone through every OPF and found or adjudicated every NAC that was missing okay.

Further clarification on October 27, 2007, we do not have that swept out all the card readers and everything else to use those cards for _____. You are in PIV II my friend. You are in PIV II. I am not there yet. I am getting there. It is not PIV II I am still on the first line. All right, okay, we are going there right now. They just started implementing part II PIV II. You must start by October 2006, according to the current guidance. You must start issuing FIPS, my God too many letters FIPS Compliance Smart Cards by October of 2006. You may have a program wherein you can start sooner than that because if your are compliant with 800-73 part II you are compliant with the FIPS. I am saying that out loud and this is probably going to hit me over the head tomorrow, but I am saying that I out loud. 800-73 says there is this transitional compliance and then there was the end game right. So if you thought if you are interior and you are issuing smart cards today and you take the steps to make those smart cards those cards ____ compliant with 800-73 part II and you do that let us say by December 31, 2005, you could put that date in on that second line. You agree with that? I agree with that. Thank you for the little _____. Two of us agree anyway. Judy the other side of that is the rest of the question goes to an exchange this morning between Tim and Jim where the question came up by when and that is the rest of the question that is being asked. I think by _____ this stage by when do I have to have implement, issue cards to everyone, for is that the date of full compliance or is the date of full compliance. When you have all your systems and processes in place even though you will have transition cards still in the system, is that closer to the question. It is kind of close. Think him, it is all the calories you are burning going up and down. I don't have to exercise later.

I am reading that as _____. Its Thursday afternoon, not Friday afternoon settle down.

That does say, employee and contractors using a compliant card. Yes. Now, when I hear using a compliant card, that means I am using that card for logical access, yeah and I am using that card for physical access, yeah. Is that October 27, 2007 or is that a date that is undetermined at this time. That this the date, you are going to tell OMB. So, I can say 2020. You can they are going to throw it back in your face, but you can, but they have not given us an end date that we have to be compliant , you tell them, that is part of what this plan is all about. If it was all cut and dry, you won't have do a plan, you just, you know comply or die but it is _____. Is that a new model for next year comply or die , I am not being quoted am I. I knew this session would get off on it, and this is. Yeah, I am sorry. Judy, I like to make a point on that, even if an agency was able to issue all their cards PIV complaint cards to all their employees, it would still take ideally roughly three to five years to have all those cards issued, so that statement ____ compliance. You won't be in full compliance until every individual has a PIV card, well in a state you have already issued approximately 60,000 cards and allowed him to be issued today that means they are good for at least a three year period, so if we had everything else in place we would not be compliant until that last person got issued a PIV card. So that date is the date that you are going to tell OMB based on where you are and what your situation is and probably you know, size will come into it, but that is something you are going to tell OMB and that is an important point. The point I would make about this though is make it a realistic date 2020, it could be if you can justify it, go for it, but I have a date in my head, that I think is probably the date beyond which and well it is probably the date DoD gives us. If DoD can get there we will have, so can the rest of us. I do not know what that date is and you have to decide and that is kind of what the handbook is there to help you do, it is what the OMB guidance is going to be there to help you do, but that is certainly is the date you are going to give us. However, the second line, when you will start, they do give us a date for that. They expect everybody to start it by 2006, so if you are not going to be able to start by 2006 then you probably need to be preparing your justification for that. I expect to see that, but as we work through she will see where you can do some of this elucidation.

This is just a general, wait till we get to the real questions, may be you won't go home today. Alright, now what we did when we created this document and this was actually done by committee ____ this on us. They asked us to help write it, so we the _____ actually helped right this subset of the _____, so what we did is, we separated it into the big buckets and the big buckets were the control objective and we tried to come up with a set of questions, using the _____ standard to do this. So control objective A is identification that is issued based on sound criteria for verifying an individual's identity and the first item under is that it is a proved prudential issue and some maintenance process as defined in FIPS 201. This is that self-certification where you have decided that your enrollment process meets the requirements of chapter #2 of the FIPS. This is what we are writing the criteria for to help you make that determination as a sort of a checklist of things, yes I do this, yes I do that, yes I do that, yes I do that, okay, I am compliant, but that is the first thing and that actually is as I read the FIPS from the guidance that is an actual form of process where the head of agency or his designated approving authority is going to actually sign off on your normal process, as being it is sort of like a self-certification process, like a CNA, but not a CNA.

I am hoping to have a draft of the criteria to you within the month, by the end of May. I am working very hard to do that, so that you can take a look at it and fire shots at it and tell me why I am asking too much or not enough or, too confusing or not confusing enough. I actually had a bit of problem with NAC because I actually think three and I could have made this comment OMB, not sure whether or not they will take it, should say is completed within sixty days was it six months? I could not remember what the FIPS finally said. I have to bring discipline back to this, I am sorry, we are recording this so when you want to shout something out please raise your hands so we can get a microphone to you and record it. So actually while two is correct, you must have a next prior to prudential issue into three is actually incorrect, it is within whether it is 60 days or six months, I cannot remember, of prudential issuance. Hopefully, we got that correction in, but again.

Could you just clarify what your number 2 national agency check or equivalent means. Right okay, some organizations do not use national agency check, they use another background clearance form that has been approved for their use, and OPM has determined that it is equivalent or comparable to a NAC, so let me give you another example, people that work for DoD, often times have security clearances and they get background investigations to get those security clearances. I would submit to you that a background investigation, even if the NAC is missing is probably equivalent in fact equivalent plus a bit. So, in actuality somebody asked about an SAC and I am not too sure what the initials mean, but apparently postal service uses them. I have got a hand up down here. Yes, _____ postal service it is a special agency check that we have. Do you know whether or not, it has been approved by OPM as being equivalent to the NAC. I do not believe that it is. I think we _____ OPM came back today, but I think that that is probably a step that we were going to have to take at some point. Clarification on that I am not sure right now, and I have got a hand up and head shaking at the back. Department of veteran's affairs uses an SAC, it is a special agreement check with OPM for fingerprint check on that is what it stands for with us. Oh, good , we got some question as to what an SAC is or may be there is two SACs.

This is Janice I come with GSAI security, there is a special agreement check and any agency can make arrangements with OPM for whatever check they want and so each agency might have a different special agreement check. Whenever we have a GSA that we have been negotiating for year to use for our contractors does not meet the standard of the NAC.

Any body else feeling a big OO. That was not good, yes , we are going to have to change GSA, however it gives us something to do. The FIPS says the NAC or equivalent, so if you are using something other than the NAC you need to find out whether it is equivalent, and I believe it is OPM that will make that determination for us. Now remember yesterday morning, when Janet said that she was going to take on this issue of NAC and ____ and she was going to work with the FBI and OPM.

Now remember yesterday morning when Jeannette said she was going to take on this issue of NACs and NACIs and she is going to work with FBI and OPM. I will put this on that little work task list for her and suggest that she discuss that with OPM as well. I think that is a very important point and I am glad that was brought out here. I do not know, State does good clearances I am sure, I do not know about interior. See, I start my no! no! no! no! I did not mean it that way (laughter). I did not mean it that way, I did not really. I just said I, you know, sorry that was bad.

___ take back.

The problem for me is, I do not have a point of reference. I started my career in the US Army. In the US Army I got a NAC. Then I got a BI and then I got an SBI. Then I went to GSA and I have always helped this little security clearance, ____ following me around for 30 years. So you know, it is a kind a like   I am not really a good person to know how this goes.

We have been gathering intelligence of your interiors, so we are into that (laughter) and we are finding that the numbers are   we were actually surprised at the high numbers we had for NAC with inquiries accomplished. We thought it was we had a large workload ahead, but we are finding it rather small now, so we are again pleasantly surprised.

Good.

So you do more than just contact us. Right?

I did not really mean it that way, I kind of meant that I was not sure whether you collect it NACIs or some other agreements. God! I am going to go and sit down in a minute. I know I should not have come back downstairs. All right.

#4 is important and this is actually going to be a part of how you write your policy or your enrollment process, oh! I cannot hold my hand up, but all individuals to whom an agency ID is issued are the same intended applicant/recipient that was approved by the

_____ authority. This is your chain of evidence piece. I come in and I get identity proof, did not I come back and get my identity credential and am I actually the guy that showed up on day one. We have to make sure that we actually have that identified in our enrollment process. How we track that and how we make sure it happens. For those of you that remember the old version of the _____ they actually told you how to do that and then they moved to an appendix. So any questions or comments on that?

All agency credentials are issued through systems and providers whose reliability has been accredited and so documented and approved in writing. This is that fourth control objective actually, I think that one is the one that moved and that is what is the FIPS for certification of accreditation of these process is being written to address. I think that one might have moved. But again you have five choices about how you answer this. One through five. So you either, gosh, I do not think of that or yeah we are doing that and or we are in the process of writing that plan and I expected it will be finished by this date. Now, question was asked of Ralph in the previous session as to what you do when your large agency with lots of independent, fiercely independent bureaus. I am GMSA and you know we are very fiercely independent. We do not even have bureaus. So we actually prepared a worksheet that we think you will be able to use that allows you to break this down into regions or into bureaus or into subsets and then figure out where each of those lie and then aggregate your responses on up to where your entire organization sits and then include that if you will as an attachment when you actually submit your template to _____. If that is the value and if you think that is the value, we can make that available and put it out there and you can tell us what you think about it and whether or not, I am seeing _____, so we will do that. I will get a hold of that and will actually send that out and get that posted to the web site and folks see can what they think of it. I will have to get permission of course.

But now if any of these questions are in the negative and you have a real problem with them. Particularly the fact, that you are not going to be compliant by October of this year. You are provided with an opportunity to explain yourself. All of these sections provide you with the opportunity to provide comments to _____ to assist them in evaluating your compliance. So you can please feel free to use that section. All right.

Control objective ____:
Identification that is strongly resistant to ____ tampering, counterfeiting, and terrorist exploitation. Basically you are looking for the visible external security features in this particular section.

Do you have the holograms etc?

I do not think anything got added to that. I think that is the only thing. You know that is a tough one. How do I make my ID? You know resistant to terrorist exploitation.

If you are going to be changing your current ID to the eventual PIV2, it is a little hard to make a change to an ID that you are getting rid of within a year or two. How are you supposed to come into compliance with that, if your current ID does not currently meet those requirements. There is no hologram on ours, it is just a simple prox card, just printed out. There is no way that I can get into compliance without taking every card that our agency has, putting a hologram or some other feature on it and this would also go for the next one as well. The FIPS 201 electronic security features. These seemed to be PIV2 requirements that were being stuffed in the PIV1.

And actually a couple of these did get pushed to PIV2. I do not know if this was one of them.

If they are not Judy, I would submit that one of the answers they can give is "noI am not" answer and then the agency section would provide comments, _____ I would do this as part of the PIV2 implementation and let _____ react.

I actually think this one has been pushed to PIV2. I think it has. He always think so. Oh! I mean yes.
He actually was reminding me of what we

I was just saying that I believe that is now PIV2, that is where it belongs, but also there is no holographic over _____ required in PIV2. This is just the _____ location of the standard _____.

That is right. I think that is true. That is right, they were going to put some _____ requirements on there and then did not.

As _____ suggested earlier today as they talked about and yesterday as they talked about something that is really tamper resistant. It is the digital certificates that is bound, that are more so and so I think one appropriate answer is even if you had a very weak _____ piece of plastic with nothing on it, but it had the right PKI credentials and it was bound by a PN and/or something that you know, some multifactor authentication that is additional truly if you will work in an agency as doing toward this control objective which is stronger than that particular assertion.

I think that is true and I think that has gotten to later on in the questionnaire. I think the concern here is and that during this early years a lot of it is still going to be relying on visual inspection, we are not going to   you know mean, the vision is someday   you know, it is all automated, it will kind of be like a minority report, but I think, which is not necessarily a good thing, but I think there is this period of time when we know that will be transitional and will still be relying on humanbeing to look at cards for some period of time and that it is important that the cards themselves have, somebody told me the other day they have cards that that make on, like a word document or something and then they cut them out and laminate them, it scare me. Okay, Rick, yes sorry.

Thanks Judy. With regards to this last set of questions I want to tie back to something that you said earlier and that Bob agreed with you about taking a PIV1 card and _____ SP800-73 interfaces and having a PIV2 card. I just want a clarification on that because in the _____ requirements for, once you go to PIV2, PIV2 _____ what the card look likes, the card durability, its resistance to chemicals and the sunshine, the tamper resistance. The fact that it supports both contact and contact _____ and just as a clarification, all those requirements are still valid in PIV2 and if you have a PIV1 card that does not meet those things, and you and you add the SP800-73 requirements. If you still got it go do all those other things as well. I that correct?

I think you do could probably get an exception on the topology if all the other bits are in place.

_____. There is a whole bunch of things in PIV2.

Right, but those are things that you could put on a current _____ card.

Right if you, yes, you could put it there, but if it is not there, you still need to get it there.

Yes, and that was part of my point of, if you are deploying _____ now that you can get to part II compliance without having to pull all those cards back and issue all brand new cards, which is the concern. Come on smart cards, not at me. He is just smiling at me. ____ oh boy! you are digging yourself in, is that right.

You said that possibly this question is moving to PIV2.

Yes.

When it moves to PIV2 does that mean with this only two core objectives that we have to meet now for PIV1. We do not have to no longer meet the one about the tamper resistance.

Right, because the PIV1, you do not have to actually issue _____ compliant card, so it becomes a bit of conundrum.

So _____, guess make a correction or do something.
PIV1 says we have meet the core objectives and states that the credential or the card that you issue has to authenticated electronically, and it has to have these other topology features on it.

Right, I need to have a discussion with _____ about that because in actuality when you look through the document, PIV1 is really the enrollment process, and everything to do with the physical card has been moved to PIV2. So, there is a bit of paradox and I apologize for that, but you know, if its not available, you cannot do it.

There is the ____ guidance and then there is presidential directive sign by the president, which I know that only _____ are high level organization in the United States Government. But I think, the presidential directive and the controlled, if you will, objectives in there are still the intent. I imagine of the President, unless he is going to amend it for us to achieve, but there is two things, if you will test ability and then they are certification process _____ these secretaries, as I present this to the secretarial staff. I wanted to be able to look him in the eye when I say that they have complied with the presidential directive, which is different than certifying to PIV1 and PIV2. So those kind of, if you will possibly conflicting objectives are out there, but are very real, so we are actually going to try to achieve this objective as we go forward.

Right, yeah, and is one of the reasons why ____ has given us that extra year for the actual physical compliance, starting to comply physically. Because they realized that between February and October, you know, this is the impossible dream. But Tim, who really understands 800-73.
Go ahead.

Okay, my question is related to.

What is the question.?

You know where we are in our deployment program;

_____

You know keep asking this question, so I asked this question again. I will try to make it the simple straight question, is that if we deploy _____ to one with a current validated outputs with a PIV data model that is a fully part II compliant. Is that going to be considered a fully compliant PIV card for its entire life.

For the card's entire life.?

For that particular card, you issue _____ to that one card to an individual and until you have to reissue that card, you know at the nominal life cycle, they retire, or they transfer, or

3-5 years.

Or you know you gets to the end of that life cycle of that card which we say is 3-5 years. In the case that you got a long-term employer that holds that card and takes real good care of it, can he hold it for 5 years and not have to replace it. More of the expiration date, which, you know we will presume will be

Till the expiration date, and we are assuming that the reason you issue this card is because it is either current stock that you had or parts _____ are not available for you to buy.

Exactly.

So, you had to buy these.

Until a time when you can buy a validated card, and you issue those cards up until that point and then, you know, you started issuing the new cards when they are available. But you don't have to go back and reissue those cards that were issued under part II compliance.

My answer to that is yes.

It would have to be if you are going to take into account.

That is the reason we _____ was compatible. That is the reason we are requiring _____ and the answer is yes, I mean that is the whole point. If we do not do that then we are4 being silly. And I will fight that tooth and nail if anybody else does not think so, _____ that I am stubborn a bit. Guys you want to go home today right. It is only half an hour, I got plenty of time.

Hi, I am _____, Department of Justice. This time _____ great team to start with and makes people to think what they need to do; but why not to come with a designed template that it shows including the _____ what needs to be done. What ____ of work needs to be done and type of the _____ which are coming with that and that would help that everybody would be on the same page.

This is specifically to satisfy the HSPD-12 requirements that you have to do a report to ____ for June 27. So that is what the purpose of this is. Your thought of a designed template that does the other. We have attempted to do some of that in the handbook and when Ralph was talking about the checklist of things to look at, and the things that you need to include. That is sort of an attempt to do that, but if you think that we could do something better. I think we would be happy to entertain that.

Actually _____ suggested the implementation checklist is a wonderful thing to start, but if you can translate that with the plan implementation _____ that needs to be done with the time life and the milestones that needs to be reached. Because this is all about interoperability between all the government agencies and is very important that everybody to be on the same wave length that everybody knows exactly what they need to do in what timeframe and they would be able to accomplish the end result which is October 2006.

We welcome that suggestion the _____ does and we hope that you will be able to provide staff assistance with us as we work through these issues, so that we can share this joint work. Thank you.

Yeah, I think the _____feels the same way.

Right that down, just as team volunteers.

Lets get real for a second Robert. We have talked long and hard for a number of months about the fact what ____ requirements are going to be is not the same as interiors, is not the same as yours**.** Because of the organization and everything else they are going to have a different project plan, though I _____ your desire. I think the reason we get a generic checklist in here, is essentially recognizing that we have snowflakes, and those snowflakes will accumulate to get to a point and will have a 12-inch storm, but at the end of the day, everyone is going to take a slightly different path to get that storm and all we can probably do and is say here is the checklist, take that which fits to your situation back down what you know your lead times, your procurement lead time. For example may be different than the procurement lead times of another agency just because of your administrative overhead and so that changes your plan from that other plan, _____ Washington, unfortunately.

We do have available project plans that are in our archives, though and we are going to share those.

Oh, that will be nice. We could put them in the handbook."

Judy, since GSA is mandated to push this project. Why is in not it that GSA will not just go ahead, determine the full configuration of the card and agencies buy these cards to do what they have to do. Otherwise, we have got a 100 and some different agencies, the card may be ____ in any kind of way, that way it will be _____ throughout.

I'm in charge, we will do it my way. No, no.

I, I was sleeping _____. Mike was paying attention.

No comments.

Lu was asking why doesn't GSA just tell everybody how to do this and, and preconfigure all the cards and you just do it our way.

Judy tried a couple of times, but

I tend to think of myself as a very friendly, you know, like team player kind of person, I don't come across that way from time. . .

Judy I think that would be useful here to reflect back to a GSA led effort about a year ago, it was called the topology working group and there were so much consensus in that group for a long, long time. That is why you will not have a single implementation in one dictator of everything.

Yeah!, Lu, the point here is, Lu, Lu, the real, the real thing is that what we've tried to do as noninvasively as possible is put the requirements in place that will ensure interoperability, but you and I both know that we're a government of fiercely independent organizations, and you were there with us in the early days of PKI. Remember back in 1995, we were going to create a hierarchical PKI. Do you remember why we went to a meshed bridge environment rather than a hierarchy. Nothing has changed, Lu, nothing has changed. It is the same government we had then and, and frankly they have different uses. If you look at, Jim is absolutely right, if you look at DOD and what they want to do with smart cards and you look at interior and what they want to do and state what they want to do. We cannot satisfy everyone with the same implementation. We have to make sure that whatever they do doesn't violate the minimum requirements for interoperability, but beyond that they need to be allowed to do what they need to do in order to make these cards work for them. We just don't have a one-size-fits-all government. Go ahead, sir.

Judy, I just wanted to say that there is a tool available from the smart card alliance because we have done some work to try to put together the steps that are required for a project plan to implement the smart card system and even though it's not going to get to the detail about what you need to do to be specifically compliant to PIV1 or PIV2. There are some good logical guidelines to follow in terms of, of decision making that has to be made along the way to get to the point of actually doing the acquisition of, of, of making the, the purchases and putting the data together into the card and I will share that information with _____ and see if we can make that available either in the, the handbook or in supplemental information that will be handed out by the government.

That will be great, thank you. We appreciate that Randy. All right. If there is no more questions about B, was that, was that even B, we are over on C now, I'm on a whole new page. Identification, I changed it _____ was looking. Identification that can be rapidly authenticated electronically. Why do I just go from controversy to controversy. All right. I happened to know that this has changed slightly, but for the time being, what we have is all agencies IDs are issued with _____ electronic security features. Basically what it is saying is your issuing credentials, then this is in PIV2 by the way. You are issuing credentials that meet SP800-73, SP800-78 and God willing SP800-76 will be finished by the time we get to October of 2006. If these electronic security features are deployed, but not in use, please explain. I have a feeling we don't need those. I have a feeling that those probably would go away for that question. Yeah, that's basically, for authentication. You're not doing _____ yeah, okay, he has talked with us. I am not allowed to answer the question until you said it loudly.

I suspect that's actually speaking to the electronic use of the credentials, so _____ actively using the _____ involved in transactions. So, it's one thing to deploy and how the features, it's another to implement and take advantage of.

Right.

I think they are quite different. I think they're pretty significant.

Yeah, and I actually think, I think this may have been reverted so, so it says are you using them. Yes or no, If not, why not. I think that's kind of how it has been reverted if I remember rightly, but my faulty memory, but the point here is are you deploying cards to have all these features on them. All right. These requirements as dictated and then if you are, are you actually utilizing them. Because there is one thing to say, yes, my credentials can be, my credential can be rapidly electronically authenticated and whether or not anytime in it's life this credential has been rapidly electronically authenticated. Don't ask. All right.

Judy, I got a comment.

I got to remember that I'm being recorded here. I'm going to make big blunders. I'm sorry. You erase this part of the tape.

_____ right where you're at. Every page, every section so far we have that provides comments that would assist.

That's right.

Okay. Is it going to be in 25 words or less or it just going to be permissible where, you know, some agencies just love the right, you're going to have it.

You know what, it doesn't say.

Okay.

You can be as prolific as you like, war and peace, right there.

Hi! Judy. Does this _____ early guidance for this comment of the guys, remember the resume ____ you read.

The thing is, again, remember when we built this, _____ said lets make this as simple as possible. We don't want this to be _____ to the agencies, but we wanted to be valuable. We want it to actually tell us something. I think that as you go through this, it actually gets you to think about things that may be you didn't think about, but the other thing, I certainly going through this is making me think about some stuff, but also you do want this to be a value. So if you can actually say five, going right down the line, but there might be somebody out there they can. Then, you know, you probably don't have to make a lot of comments and you do not have any problems, but if you have a got lot of ones and twos and threes, you may actually need to do some explanation, just to help _____ understand what you're doing, but they are going to look at these plans, in fact, they've, they've suggested that they are going to try and turn them around within a month. Oh, you've little faith.

Be careful, we do not know who is doing this evaluation yet.

I do, Oh. The actual evaluation _____ is going to enlist the help of a little working group that was led by _____ and put together during the development of the _____ 201 and that same group of people several of whom have talked over the last two days will be hoping, assuming they can provide this, you know, they can spare the cycles, will be hoping to actually read over these things and that's why we want the them at agency level by the way. We really don't want 500 and giving a recommendation back to ____. So it is a friendly group that is going to be looking at these.

Judy, I got another comment.

Yes.

A while back Jeanette hinted in one way that ____ might stand up a website or at least accept E-mail versions of this. Do you have any more information on that. Oh, she has got something there.

It will be able to be submitted electronically, I think. Until the letter comes out of _____, I will not know for sure, it was in the draft, wasn't it. Yeah, in the draft, they said you should, you can fill this out. We are going to put it up as a web syllable form and the intention is that you fill it out and then you attach it to an E-mail and E-mail it. That was what came out in the draft, that's is what I was reading. I don't think that changed and I think that's still the intention to make this as easy as possible. Let's go to the next page. I was not as controversial as I expected. I guess everybody is tired. I'm. Control objective date. This is the last one issued only by providers whose reliability has been established by an _____ process. This is of the intent of the new special pub that is under development right now in _____.

They hope to have a draft out within in the next 30 to 45 days. It is going to refer back to 800-37, which is as you know is the CNA requirement. This is actually a long-term kind of thing because for the purposes of October 05, you can self certify. Your agency can self certify, but going forward long term, we have to worry about this control objective. So we are going to have to look at the validity of the providers and make sure that we are certifying, there is an accreditation process through which we can certify their capacity for doing this.

Judy, given we have seven weeks from tomorrow to finish filling this out and getting it through some organizations is fairly arduous process, when can we expect to see the final version of this that we can start working on.

_____ clearance process. I said _____ good answer to that how about before June 27. I actually think, it will be very soon. I seriously cannot put any dates on it. First of all, I will have control of it and second of all, it is not I do not have control of it, but the reason I am doing this exercise today with you is it I am strongly suggesting to you that if you have not already done so, you start answering these questions because when they comes out, 80 to 90 maybe even a 100% of it you just how be able to transfer over to the final format. It is I believe is that close seriously. If you have not already started, start answering these questions, start gathering the data for these questions.

This is a good interlude for what we are going to do next in June.

Right, okay, so Jim now wants to be to plug the June 16th workshop, which will be a one-day workshop. By then we should have the final template. If we do not have the final template, we will move the date, but right now, tentatively June 16. We will hold a one day workshop where we will actually go over the final template and you will by then I hope, have done quite a bit of the background research for answering these questions and made lot of your decisions and you can come to that workshop with questions and guidance. Well actually maybe not, if we have good sort of description of _____. I can promise we will have the guidance by the time we have the template.

My question you cannot answer because I was going to ask how we supposed to answer that question if we do not have a date.

What you expect the agencies to put in that block.

Which block?

The question that I want to ask, is that, over the past two days, we have heard confusing and conflicting information. I can tell you that the people at my agency who are responsible for filling out the form were not uninformed about what needs to be filled out here, I mean that is not the issue. The issue is that the draft guidance that is currently on the website that you can download does not reflect things that have been said by you this afternoon and it does not reflect the things that referred from other speakers over the last two days. So in order to complete this form, it is really important I think to understand that a part II compliant card is a long-term solution for those issuing prior to October 2006. I mean, we need to have that written down and it is not interpreted. This is very clear.

I will see what I can do Tim. I agree with you that we actually need to get this straight. When you say that a part II card is a long-term card. I actually think three to five years a short term. I actually think of long term is in 2020 that is the card will be issuing. I hope we will issuing the part II card in 2020 because part III cards will be available, it is my hope. I understand that I will try to get a lot of this stuff clarified. You know, I am thinking about how you get that clarified, right? Maybe I can get an instructional letter out of this.

Comments by May 9. Add that to the comments that have to go _____ and make it loud and often in that response.

Everybody in this room make that one of your comments. Remember they have to be spun up to the head of agency. They cannot come up _____ one set of comments per agency, but get that into your agency comments. That is a good point Jim. The due date on comments on the guidance is next Monday.

But that is the guidance that was signed out.

No, no, not the NG plant template but the guidance, but Jim's point is that understanding the guidance is necessary to truly understanding the template.

I have a question with respect to that, the comments on the draft guidance are due by the 9th of May.

Monday, right?

I think, I do not have to actually do it, but for agencies to actually comment on the draft guidance, when they are probably 300 questions that remain outstanding that were generated at this afternoon and 300 yesterday. Also some conflicting comments that were put out here at the meeting. I think it is impossible for agencies to actually review the guidance. I do not know how you can comment on a guidance until you see the answers to some of these questions.

I remember yesterday when I was talked about fair and reasonable _____ we go forward and a kind of economic sense. We have done sort of _____ accreditation have been part of those risk assessments before and in those documents, one of the things that there is a punch list of things you lack to completely 100% beyond your shadow, though it can be able to, you know minimize every risk in the world. We do risk assessment for facilities and systems all the time and in that punch list, there is a gap between the current state and you know if you will desire perfect state. Those things exist and that is routine part of certification and accreditation processes and that is why we are doing if you will, the agencies are going to do. Even the third party has reasonableness involved in this evaluation process. So I know one of my engineers I have when I am building buildings and fire trucks, I want those tyres _____ every time. I do not want to do anything fancy to how to put some kind of universal joint between you know as we convert fire trucks and build bigger ones, but sometimes we do have to do weird things to make new equipment work. The same I think is real here. This is part of configuration management and I think this is new, there is a lot of anxiety about launching again something that we think is at risk and I think that maybe or even sometimes over stating these risk issues. I do not know, I am going to offer that Judy. I heard that from Janet _____ yesterday also.

We are in the situation where we are being driven by an external document and I should stop now. Let me to say, you all know that we are being driven by HSPD 12. There is nothing we can do about HSPD 12. It is there. It is in black and white and it has dates in it and we are being driven by that and if it were a perfect world, where we were being driven by HSPD 12, we would have all kinds of time in the world to work all these issues out and get to it next year, but unfortunately we do have this requirement and as a government, we need to be working together to make it happen now in a way we are flying by the seat of our pants and I love working in crisis mode. It seems like you know, I just get such a charge out of that. It is a daily thing for me, but I am sensitive to the fact that there are lot of questions, maybe the guidance does not answer all those questions.

You have given those questions to the organizers here and we are going to try and answer those questions as quickly as possible and get them posted to the web site. If you think there is something seriously lacking in the guidance which Tim suggested the risk, make that comment, you know and ask them to elucidate. There are some things that they just cannot elucidate on and you also have to look at some of the different parties that are playing. OMB is primarily a policy organization. If the question is technical, they do not usually want to put that kind of technical detail into a policy document. So they will be looking for somebody else to address that, may be NIST, may be GSA, may be DOD, may be interior.

What we think we know some of those friendly faces, who are personally, who are going to be evaluating and commenting back and I think that you can participate in a dialog with those friendly faces because they are not OMB. In fact, they have relied heavily on the agency participation and our relationship with the vendors as we are going forward and again this is a risk assessment scenario towards excess. The intent is not for us to do this perfect technical implementation. The intent is to raise the security of the United States Government. We want to raise the bar from flash passes. We want to be able to do the ID proofing, to raise the bar on ID proofing. We want to be able to use these in a business sense, the log-on computers reduce our cost. Part of E-Government is _____ efficiencies. The whole six initiatives present _____ and efficiency initiatives. So again there is whole reasonable framework surrounding this entire and again you know the friendly faces who will turn to evaluate and answer those questions. I think _____ Judy.

You got a new group

Judy, I got a Charles _____ Department of state. I got a specific and hopefully and fairly simple question. You just said that first year agency heads will do the certification. After that, it will be somebody else. Is this unlike PKI, where though a third party auditor is preferred, in turn if separate could do it.

This is not your PKI. This is your normal process.

This is only your normal process.

Must be a third party.

No, no, when I am talking about your agency head can self certify that is your normal process. The requirements for PKI are spelled out in the common policy and are not changing.

Understood. What I am saying is for this enrollment process, you said, year 1, this year, the agency heads could self certify. After that, it was going to be somebody else.

I said that they were riding a special pub and then it would be an official certification and accreditation process. ALA 800-37 and that will all be spelled out in the new special pubs that are being created for this.

It does not exist today and so for October of 2005, you can self certify that you meet the expectations of PIV 1 is the enrollment process. Chapter 2 with the FIPS. All right, I have moved on in the old track this is where PIV2 started. We have already ascertained that PIV2 and lot of other stuff actually will fall into PIV2, but this is where we would actually gets down to the technology and to have an implementation strategy for deploying essentially the FIPS to one card and then they want high-level milestones. When you are going to start, when you are going to be finished, I do not know, what is in the middle. My acquisition should be you know, I start taking delivery, I do not know if that is high level or not. The training place, I think it has been separated out from this. I thought this was the straight place for training and I think it has been separated, but you do need to address training. The people that are sitting in the trusted rolls, people that are in the registration rolls, they are participating in the enrollment process, must be trained so they understand their responsibilities, right Bob.

There was a requirement to train the applicant. I thought the trusted people I understand, but what about the applicant training? So in other words, everybody receives it could ____ get training. So that is the way it is written today.

I do not think it as an HSPD12.

Our intentions are to do that. We actually have a current video album on the web site that we are using that we developed and we are working to do some end-user training that we are to create if you _____ expectation and to talk about those issues that are important to all end users. We don't want this perceived as a big-brother scenario. We want them to be aware of privacy issues. We want them to be aware of where they can go to get further information and how that they are expected to improve their services in security as they used this card. So we are going to do some end-user training regardless of requirement or not. It is a part of the critical path.

In the website where that training is located?

SmartDoc _____.

It is going to be updated.

Bob and I have actually been talking about this and this smart card IB and the FIC are going to work together to actually develop some computer-based training for end-users, familiarity training. I personally think it is really important because a lot of people are scared about this card, they got questions and I think familiarity is the best way to fight some of those demons. So, we will be developing some training and DOD has got some training that they have been developing and they have offered that up you know to make it more general sort of like, I guess take DOD will break off of it and make it more general as government training and you know adapt it, so that it is good for everyone. So training is important, but the training of those trusted roles is really job one, making sure the people doing the registration jobs, know what they are doing.

I had a followup question this gentleman has questioned a couple of minutes ago, again regarding the certification. In FIPS 201, it says the identity proofing and registration process should be accredited by the Inspector General and then signed off.

You are reading a draft.

No, this is the final.

That is _____ now.

No, you are reading a draft that was taken out.

Oh! It is corrected in the errata.

It is also an accreditation certification process, so for the card issuer themselves. So those two separate process appear that there is regardless of who is accredited or approved, there appears to be a proofing and registration process and then also a PIV card issuer process.

So there are two pieces here. There is the fact that your enrollment process is an approved enrollment process and there is a fact that if you contract this out and somebody is providing the service to you that they are an accredited provider, and if you have an entity that is your issuer. Since this is a GSA, we have a vendor that does the issuing for us.

That looks separate from the actual enrollment process itself from the identity-proofing process. There appears to be two kind of sign-offs, correct?

Identity proofing is a part of enrollment. If I use an external issuer to actually create the cards and issue the cards that issuer has to be certified by an official accreditation process. Also I have to certify my internal enrollment process, so there are two pieces and I am sorry, I jumped on the IDPs because that was wrong, but you are right, it is corrected by IG, I apologize. The IG is our auditor, they cannot be the approver. It is like conflicting vendors there. I am going to finish off real quicky, unless there is any serious questions about these last questions. Using the PIV credential for physical and logical access, this is actually using the electronic capabilities of the card. It's, you know, I am using them to authenticate the credentials locally and my card is interoperable with other agencies, in other words, this is a kind of another way of saying I have a FRPS compliant card and also that my systems will authenticate the PIV credentials that are presented from other agencies. So this is the notion that if I was to go to the department of interior with my GSA card and I presented it to a reader at the Department of Interior. The Department of the Interior could read the card, know that it was from GSA, actually authenticate the card's validity and then make a decision on whether or not to provide me access to the building.

Big section on security and privacy, you know we have been talking about the security and privacy basically. It goes over some of the requirements that you already know about under the privacy act and the paperwork reduction act etc., and it is just again is a sanity check in any ways. But it is just to say, you know, you put a privacy plan together here and have you made sure all these things are in your privacy plan and that does have to be done by this October. That is actually separate from PIV2, that actually has to be done by this October. Somebody has to sign it. You are allowed to submit it via e-mail.

That makes a lots of sense.

I am hoping, I am hoping that the guidance explains to you how you submit it electronically and have a wet signature on it. Of course the DOD will be a _____ sign it. I think, unless there are anymore questions. I apologize for the uncertainty and I apologize for some of the inconsistencies and it is good that you point them out to us actually because if we are not agreeing with each other, then we need to go back and start agreeing with each other.

Judy, just one last question. As I am going to speak for NASA, _____ of the same boat, I guess so many other agencies have started issuing cards, so they have _____ 2.1 cards, I think NASA has 22,000 ready to be issued. They have about 100,000 people to issue too. They 22,000 that are ready to issue. What we are saying that, they should issue that 22,000 and then await the issue of the other 80,000?

I do not understand the question.

It is a commonsense question.

Seriously Mr. Toni, I do not understand what you just asked me. You said he has got 22,000 ready to be issued. He has got 22,000 that he has, that is required. They have not issued them yet, they have a 100,0000 as _____ too, so if they issue that 22,000 cards for their internal organization, they are going to have to go out and acquire another 80,000 cards. So the question really becomes should they await for the PIV _____ to acquire, am I making any sense to you?

Okay! so let me tell you what I think the answer is, but I do not know the answer to that, all right. So here is my question to you, how long it will take you to issue 22,000 cards? What is your time line for issuing those 22,000 cards, “could we say two years.”

He said two months for those, you did not hear that.

We have been waiting for a decision on the PIV data model, which we have, the next thing to do is to have a card management system in place that can substantiate that card either at issuance or post issuance with the data model and we are waiting on that and so we have black and white clear guidances to whether or not _____ card is going to be compliant. If it is not, we are going to wait.

I am going to take this question back and I am going to get agreement from all the important people that supposedly have to make this decision for you. I think, I know the answer, okay, I cannot always get everybody to agree with me, but I try real hard. So I am going to take that back and I am going to try and get even answer to that question that is clear and concise, etc, okay. I think what you are saying to me, I have got 22,000 cards, I want to deploy. I have got another 80,000, I want to deploy. I have not actually bought this other 80,000 yet, but I would like to buy them soon, so that I can keep going. _____.

_____ also will include some _____ into.

I am not trying to bring misery to this.

Oh! I am feeling great right now.

Judy, I let you off the hook in the sense that you have answered their question, you are going to go and get an answer to that, that is enough for today. How is that?

Yeah, I am going to go ahead and get an answer and I think I am going to help with the answer you are looking for, because the commonsense tells me that I know the answer and now, I have just got to get convinced everybody else that I know the answer. So let me explain.

Get it in writing from somebody that you guys actually trust. How about that?

With that, _____ and then we are going to close it down and go to closing so that you can get out of here.

Okay, can I leave now.

No.

Judy, I am over here. Mrs. Geno Hickman again from the _____ Commerce. I also had a question about this implementation plan template and the fact that we are supposed to send this through e-mail, given the aggregation of the type of information as on this document, is it the best idea to send it through e-mail or should we be looking at, may be password protecting the _____ we sent it. Because there is no, given the 100% ambiguity, but people could be sending you anything and if they are sending you documentation,_____ Department of Commerce has only partially implemented doing background checks _____ I could take that information and use it to _____. So I am just wondering how should we send this, I mean just send it through e-mail, I am a security person, does it necessarily seem like the way to do it may be encrypting it or something I don’t know.

I do not certainly think encrypting is such a good idea because I am not sure that OMB can decrypt it. What I meant by that was, unless it is coordinated ahead of time you may have a problem. That is a very good concern. Let me go back and mention that to Janet that there may be some of the answers to some of these questions might be somewhat sensitive. You do have, I mean I know that she would like to receive these via e-mail as an attachment, we might be able to provide you with a secure space, protected space to send them to, rather send them just over Uncle Joe's e-mail because that is a legitimate concern. So let me see what I can do about that. You all know that if you are using a PKI, I am using a different PKI. Your PKI and my PKI won't work together _____. Oh! Sorry.

Was that to me.

_____ then answer to question, we are looking to make the same type of investment decisions right now for FIO6 and for FIO7 for both are PKI rule out and are HSPD12 rule out. So we probably should just give you some specific tactical questions, that we would like some direction on our work wit you _____.

Yeah, please submit those questions to the organizer, I will make sure that we got those pulled together. One of the thing, I wanted to mention to this groups since we have, those of you that are left, is a very important one though, "how many of you are in the process of putting together O7 budgets?"

Good answer.

If you have not added a line item for HSPD12 compliance, do, they will be looking for it. It is a kind of one of the reasons why card compliance got pushed out to October of 2006 that happens to be the beginning of 2007.