| Ref# | Section/Line/Unique ref. | Reviewer’s comment/observation | Reviewer’s proposed resolution | Editor’s resolution |
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| DLW 01 | 1.1 (email qn) | I note that the second ¶ of the response to 1.1 is repeated almost verbatim within the response to 1.2 -- is this intentional? |  | Editor’s oversight – text now split between 1.1 and 1.2, occurring once only. |
| RGW 01 | General | Since we address international issues but also make reference to the ‘Government’, ‘Federal Government’ and ‘US Government’ and consistency which makes clear the ‘internal’ reference | Use ‘US Government’ throughout. | Will be accommodated in a final editorial clean-up. |
| ML 01 | 1.1 | Without discussing how NSTIC will be operationalized it seems almost inappropriate to discuss financing and the steering group in any detailed way beyond setting up the steering group.  Once the value of NSTIC  catalyzes in a way that incites organizations and governments to invest time (and money) then the discussion of funding travel is in a context to which it can be appropriately pitched.  In this regard I think illustrating how assessments of standards, certifications, attributes, credentials will form the core operational business of the SG may be best approach for NOI response. Especially in the context of the tangible value this will create.  I think not writing this NOI with the clear tangible benefits at the forefront makes this more difficult and harder to sell. | The Kantara Initiative community provides one such model that encourages innovation.  The development of common standards, assessment criteria is a method of operational integration that Kantara successfully fosters day to day.  The combination of diverse policies and legal requirements into an operational structure of governance that is based on developing standards and assessment is an effective approach for NSTIC governance. As such our recommendation is to leverage the use of the Kantara Initiative structure  to develop the initial structure for the steering committee formation.  A Steering Group support structure should comprise reps from expertise areas (technical, legal, policy, privacy, security, operational) but also stakeholder representation from the ecosystem participants: public sector, private sector, end-user, and international. As NSTIC proposes tangible financial benefits for the operators of the infrastructure the balancing and development of these benefits should drive the development of the effort. We recommend that the Steering Group itself does not make decisions on the above areas. Instead we suggest a role which facilitates the creation of sub-groups of experts and stakeholders to develop the interoperability of assessments and standards into the cyber-strategy that achieves these benefits. The SG can then aim to evolve the NSTIC principals and operational requirements to provide the practical  guidance necessary by co-ordinating appropriate communication between the sub-groups. | Accepted with modification except for the high-lighted portion, which is rejected.                        This para rejected – essentially a re-wording with minimal additional meaning |
| CSC 01 | 1.1, paragraph 2 | typo | Change “Selection of individual able” to “Selection of individuals able” | Superseded |
| CSC 02 | 1.2, paragraph 1 | typo | Change “and the the Leadership Council” to “and the Leadership Council” | Accepted |
| CSC 03 | 1.2, paragraph 3 | It’s not clear what the benefit in Kantara’s response is to having this stand-alone paragraph introducing OECD is. The OECD and ITAC structure is referenced in context in the very next paragraph. | Remove paragraph 3. | Accepted |
| CSC 04 | 1.2, paragraph 3 | It’s not clear what the value is to suggest that OECD would “direct to (?) the Steering Group in rare instances”. | Replace “leveraged to act as a Reference Group (a 'UN of Identity' if you will) to advise and if necessary direct to the Steering Group in rare instances” with “leveraged to provide advisory opinions to the Steering Group” | Superseded |
| CSC 05 | 1.2, paragraph 3 | The two sentences on potential funding re-direct seem a bit inappropriate and/or out-of-scope. | Suggest striking the two sentences “Since most jurisdictions… … Committees (e.g. ITAC).” | Superseded |
| CSC 06 | 1.4, bullet c) | It seems understandable where this comment is coming from, but the notion of open source implementations driving the development of the identity eco-system seems to be out-of-scope, and contradictory to the principles of industry-led and consensus-driven standards. Once standards are defined, vendors and the market can decide how to promulgate products, but this doesn’t seem an appropriate comment on the structure of the Steering Group. | Suggest removing 1.4, bullet c). | Rejected – the qn relates to the functions of the SG, which this answers. |
| SDA-01 | 1.4, bullet e) | Freedom to evolve into the type of private legal entity that best meets the need and charter of the NSTIC organization as it develops. | Insert this as e) | Accepted as: “e) Freedom to evolve into the type of private legal entity that best meets the needs, charter and goals of the NSTIC Program Office, Steering Group and the Identity Ecosystem at large. |
| CSC 07 | 1.6, paragraph 2 | It’s not clear what it means to state that the Government needs to be prepared to support legislative changes, or if this is beyond the mandate of the current NOI. | Suggest rewording “Additionally… … changes in legislation” to “KI *NDG* believes that the Steering Group will need to be cognizant of potential requirements to support legislative change to facilitate implementation of the identity ecosystem.” | Accepted, with modification to stress involvement of Fed Govt. |
| CSC 08 | 1.7, paragraph 1 | As above, it needs to be clarified what is being offered here. In addition, we need to be cognizant of the dichotomy behind suggesting that legislative changes may be required, while offering an international forum for debate. By definition, legislation will likely be on a national level, not international. | Suggest replacing the proposed response with that suggested on the 5th July conference call: The Notice of Inquiry refers to the Strategy's four guiding principles, that identity solutions must be: privacy-enhancing and voluntary; secure and resilient; interoperable; and cost-effective and easy to use.  The two principles of: secure and resilient; and interoperable; fall within the general technical interoperability and conformance domain and Kantara has excellent experience in international conformance testing and validation of identity system components.  The other principles of privacy-enhancing and voluntary would seem to fall more into the policy and legal frameworks that will need to be reconciled between the various jurisdictional bodies, such as industries or nations. Kantara can offer a broad range of application and national body experts on these topics.  The last principle of: cost-effective and easy to use; is more of a commercial consideration that will be self-resolving once systems have been approved according to the developed standards - although the work by the UMA and Information Sharing Working Groups would be very helpful in regards to "easy to use". | Rejected – this is a more comprehensive solution but the changes, if accepted, would directly suggest that KI is the vehicle for implementing the SG. |
| CSC 09 | 1.8, paragraph 4 | The statement regarding “more than a simple majority” seems to be at odds with the statements regarding voluntary and consensus standards in other sections of the response. | Suggest removing 1.8, paragraph 4 – the important factor of multi-sector support is stated elsewhere. If “more than a simple majority” refers to a super-majority, perhaps a rational for this can be provided? | In the absence of any supporting rational, rejected – this does not express a ‘rational’, as requested by the qn. |
| CSC 10 | 1.9, paragraph 2 | In light of the general positioning throughout the response for broad representation, and one-organization, one-vote, this paragraph seems unnecessary. If it is included, we should include a reference to the “practice which at present imposes unreasonable burdens” | Suggest removing this paragraph, or, at least, clarifying the statement: “practice which at present imposes unreasonable burdens” | Clarified |
| CSC 11 | 1.9 [Editor has revised from 1.10, which doesn’t exist!], paragraph 4 | The statement around “any consequential legal ramifications upon the Steering Group” should probably be clarified, by example. | Either remove the first two sentences of this paragraph, or provide a discussion of such “legal ramifications”. | Superseded |
| CSC 12 | 2.1, paragraph 5 | If Kantara is offering to be a host for the Steering Group, it would seem that this decision would also be subject to an all-member ballot for ratification. | Modify “… Board of Trustees” to “Board of Trustees and the KI Membership” | Accepted |
| CSC 13 | 2.2, paragraph 1 | “Steering Group and subordinate Working Groups” seems unnecessarily pejorative. | Suggest changing “Steering Group and subordinate Working Groups” to “Steering Group and operational Working Groups” | Accepted with slight modification |
| CSC 14 | 2.2, paragraph 3 | It is not clear what this paragraph is suggesting, nor is it clear that it is congruent with the overall theme of the response that the Steering Group should be consensus-driven and voluntary. | Suggest removing this paragraph. | Clarified |
| CSC 15 | 2.3, paragraph 2 | The timescale for funding should probably be driven by a more significant event than “after the first identities are issued”… c.f. PIV cards being issued back in 2004. | Suggest changing “after the first identities are issued” to “after the initial reference architecture has been deployed” | Accepted |
| CSC 16 | 2.4, paragraph 2 | Are we saying here that the US government should only have one seat on the Steering Group? Also, isn’t the notion of open, voluntary, consensus-based standards development premised on opinions being expressed, vociferously or otherwise? | Suggest striking this paragraph. | Superseded |
| CSC 17 | 2.4, paragraph 3 | “those same rules” – which rules? | Clarify which rules are being referenced. | Superseded |
| CSC 18 | 2.5, bullet d) | It’s not clear how the Steering Group could have a mandate to “manage proposed changes to legislation or international agreements”. Perhaps this means advocate? | Suggest changing “Managing proposed changes…” to “Proposing and following proposed changes…” | Accepted |
| CSC 19 | 3.4, paragraph 1 | This is the first time that citizens are introduced as “the most vulnerable stakeholder group”. Has the position in the rest of the response not been that Kantara has the breadth and scope to represent a wide range of interests, including citizens, by virtue of KI Working Groups, such as Information Sharing and User Managed Access? | Suggest rewording “of the most vulnerable stakeholder group: citizens” to “by the broadest range of participants” | Rejected - Whilst KI is being promoted as being capable of representing citizens, the fact remains that they have a significantly lower level of representation, and potentially knowledge and interest, hence their vulnerability. |
| CSC 20 | 3.5, bullet b) | If a discussion of non membership-fee mechanisms are included, it seems that a discussion of membership fees should also be included. | Suggest removing bullet b) or adding a third bullet c) that discusses membership fees. | Rejected – agree with the principal re. discussing membership but in the absence of actual text … |
| CSC 21 | 3.6, paragraph 1 | Standards Development Organizations have well established intellectual property protocols that are invoked at the appropriate ballot stages. The suggestion that selective “self-pruning” of the membership should be done to mitigate IP considerations does not align with open, consensus-driven, voluntary standards. | Strongly suggest removing this sentence to remove any perception that Kantara does not have an adequate and viable IP policy. | Revised text applied |
| CSC 22 | 3.7, paragraph 1 | It is not clear what “redouble” really means… | Suggest changing “redouble” to “increase”. | Accepted |
| CSC 23 | 3.7, paragraph 2 | The notion that the Steering Committee would re-balance itself if an annual review (by whom, and under what auspices) indicates an imbalance, seems incongruous with open, voluntary, consensus standards. | Suggest removing this paragraph 2. | Rejected – these comments seem somewhat fixated on SDOs. What harm in ensuring that participation continues to be representative (going back to ref to citizens, e,g,) |
| CSC 24 | 4.1, paragraph 2 | Similarly to comment CSC-21, SDO’s have IP protocols. To suggest that deliverables should be “open and royalty free” is presuming many things. Typically, Reasonable and Non-Discriminatory Terms are required to be offered. | Suggest removing this paragraph. | Rejected – deliverables from the SG should not limit their utility – systems etc. developed based on them may be proprietary. |
| CSC 25 | 4.3, paragraph 2 | The use of the term “far more mature outside of the US” is unnecessarily pejorative. | Suggest changing “is far more mature outside of the US” to “would be well served by drawing upon international experience and regulations”. | Rejected – as stated, this seems to be accurate, rather than pejorative – the suggested text shies from the point. |
| CSC 26 | 4.4, bullet d) | Again, it is not clear that the Steering Group would be in a position to mandate the commercial terms of the identity ecosystem, particularly when it is asking for it to be industry driven. | Suggest removing bullet d). | Accepted |
| RGW 02 | 4.5 | 2nd and 3rd paras place too much stress on funding the participation of non-US participants / contributors and may not be well received. | Replace with:  “We foresee times when the fulfillment of the NSTIC goals may furthered by the funding of experts with specific knowledge and perspectives pertinent to NSTIC, to enable them to participate in the deliberations of the NISTIC PO, the Steering Group or the activities of WGs and also in other for a, such as those organized by international SDOs. The Liberty Alliance, one of the co-founders of Kantara, successfully applied this approach during the development of the Identity Assurance Framework.  Management of such a budget could be assigned to the Steering Group, if not managed directly by the NSTIC PO.” | Accepted |