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**Date:** Thu, 4 Apr 2002 21:03:51 -0500  
**Reply-To:** The Biometric Consortium's Discussion List  
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**Sender:** The Biometric Consortium's Discussion List  
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**From:** "Ian S. Williams" <Ian.Williams@DATACARD.COM>  
**Subject:** Re: Information law suit re national id plans  
**Comments:** To: boitel@mindspring.com  
**Content-Type:** multipart/alternative;

Mr. Boitel,

Thanks for the response. Access to information is an important part of any country's democratic principles, even mine. However, I am glad that we seem to agree that certain information might not be made public should it actually serve to put the public at risk.

My position regarding biometric use in identification programs has always been that it's inclusion adds an additional element of security for the end-user and is actually a privacy enhancement since it may help protect their identity from theft or misuse. Privacy advocacy groups might be better supportive of the identification industry if more of us carried that as a primary message.

You asked if I felt a UBID would add benefit to a national ID program. I am not familiar with details of your UBID proposal but might suspect that it requires each individual to provide a biometric sample to substantiate an identity claim? Perhaps a national ID or even a global ID? I am interested to learn more and have asked several questions further below.

In the following list I am not trying to define the consummate biometric system, but to relay from experience where we added biometric technologies to identification programs, aspects that had a significant impact on program success. Our experience indicates that biometric applications are far more effective when the following rules are applied:

1. User enrolment and participation is a cooperative undertaking in an overt environment.

2. There is a subsequent benefit or privilege to the user for providing a positive match.
3. The biometric sample is only used to measure eligibility to the privileges for which it was provided.
4. Conflict resolution of a machine false positive match is conducted by human intervention.
5. Multiple biometric samples are captured during enrolment.
6. A certain percentage of users will be unable to provide adequate samples and exceptions are built-in to the system to accommodate.
7. The system operates in a closed (secure) environment, under a single set of rules, laws, policies and administration.

I mention these as I am not sure if a UBID would be able to accommodate some of these. I think all of us on this listserv would agree that certain biometric technologies are better suited to particular applications. (I.e Voice for telebanking; iris, face or finger perhaps for driver licensing etc). I believe most would also agree that certain technologies may provide for a better degree of accuracy when used in a 1:N environment. I believe a UBID would require the highest level of accuracy since it would be required to perform substantial 1:N comparisons.

Let me ask a few questions of your UBID proposal in relation to our findings in regard to implementing biometric applications:

1. Would the UBID require multiple biometric technologies be used:
2. Would the UBID accommodate persons unable to provide usable samples:
3. Since no vendor claims 100% accuracy of any biometric technology, how would false positive matches be resolved?
4. Since certain biometric (technology specific) live samples alter over time (reducing match accuracy). At what age does an individual first provide a sample? What are the interval levels for re-enrolment/updating? Where the current sample does not match 100% with the previously enrolled sample what is the threshold for acceptance that the individual is still the same entity?
5. What are the documents required during the first enrolment. How will the validity of these documents be ascertained? What documents from which eligible birth nations will be acceptable if the individual applying is a naturalized US citizen. How will the validity of these documents be ascertained if the country of birth is not US friendly or refuses to participate?
6. For US residents who require or request no association with any level of government body. (i.e Homeless people who do not file tax returns; possess a banking account; travel abroad; do not or refuse to possess a driver license). How will these people be enticed to participate in a UBID program? Will legislation be effected to force persons to enrol.
7. Unless every single person in the nation is enrolled. What is to prevent a visitor to the US (or already residing in the US) to assume the identity of an existing individual not currently enrolled in the UBID.
8. Will nation wide birth & death records be controlled by the UBID program administrators to assure that all identities are accounted for.

9. How will the UBID program handle missing persons who disappeared prior to first enrollment and subsequently return after maturity age?
10. For first time enrollment where the applicant possesses no previous government issued id (I.e Homeless, runaways, orphans etc) what process will be used to validate identity claims?
11. Identity theft is one of the fastest growing crimes in the US with documented occurrences in the several hundreds/day. How will UBID enrolment protect a victim of identity theft from having their UBID associated with the wrong individual who provides the correct documentation for initial enrollment?
12. For initial enrollment what is the expected wait time for approval of enrollment when performing a 1:N comparative analysis of 300 million records comprising of a) single biometric sample b) multiple samples?

Thanks ,

Ian

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