

From: Cummings.Evangeline@epamail.epa.gov
[mailto:Cummings.Evangeline@epamail.epa.gov]
Sent: Monday, May 09, 2005 5:41 PM
To: FN-OMB-Eauth
Subject: EPA comments on HSPD 12 - On behalf of Linda A. Travers,
Principal Deputy Assistant Administrator, Office of Environmental
Information, US EPA

May 9, 2005

Ms. Jeanette Thornton
Office of E-Government and Information Technology U.S. Office of
Management and Budget Washington, DC 20503

Dear Ms. Thornton:

Thank you for the opportunity to comment on the Office of Management
and Budget Draft HSPD-12 Implementation Guidance for Federal Agencies.
The U.S. EPA Office of Environmental Information has reviewed the
guidance and offers the following comments:

§ We recommend that references to sections be referred to as
questions, or the questions be re-titled as "Sections," to avoid
confusion.

§ Section (Question) 3, Part 2, Item E "System Access" - The first
two sentences read, "Compliance with the Standard requires the
activation of at least one digital certificate on the identity
credential for access control, the requirement to use this
capability
for access control to specific agency networks and systems should be
based on the department's or agency's authentication risk
assessments, required by OMB Memorandum M-04-04 of December 16,
2003,
'E-Authentication Guidance for Federal Agencies.' Ideally (but not
required) employee and contractor system access should make use of
the identity credential as part of the system access protocol." The
draft guidance appears to create a new requirement for a certificate
on the credential for access control when access control to systems
is not required. It is our understanding that the Standard only
requires a digital certificate to sign certain mandatory items on
the
credential, but nothing is required for system access control.
Further, it is our understanding that two other factor techniques
may
be utilized apart from using the credential, based on cost-effective
security principles, risk management principles, OMB Memorandum
M-04-04 and related guidance. Therefore, it is our recommendation
that digital certificates for access control only be required in
certain high security instances involving validation for physical
access.

If you have any questions on these EPA comments, please contact
myself at 202-564-6665 or Chris Bullock, Chief, IT Policy and Training
Branch, at 202-566-2793.

Sincerely,

Linda A. Travers /s/
Principal Deputy Assistant Administrator
Office of Environmental Information
U.S. Environmental Protection Agency

Evangeline Tsibris Cummings
Special Assistant to the AA/CIO
Office of Environmental Information
U.S. EPA, ARN 5315A
Mailcode 2810A, Phone (202) 564-1728