

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
1	General	The word “trusted” is used so often it’s ineffective (appears over 200 times). Can we just state up front that everything is trusted?		TRB: Agree that the word "trusted" is overused. Consequently, the adjective "trusted" has been dropped except where considered important. Because it is expected that sections of the document will be referenced out of context, the precision and specificity of the language in some sections (though repetitive) must remain. DJR: Unnecessary occurrences of "trusted" removed.
2	General	Credential and Authenticator are defined separately, yet in Sections 5.3.11 and 5.3.15 they are spoken of as <u>though they are the same thing</u> .		DJR: Clarity of text improved in Section 5.3.15.
3	General	We like the definition of federation in <u>the glossary</u> .		TRB: Noted.
4	General	Pan-Canadian Trust Framework and PCTF are found throughout. Should be <u>more consistent</u> .		TRB: Noted.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
5	General	Recommend that the PCTF make a reference early in the document that its scope applies to all “Canadians and residents” alike. Section 6.2 states that “the population universe can be defined as all living persons resident in or visiting Canada, as well as all deceased persons for whom an identity has been established in Canada,” – this comes too late in the document. It will be beneficial for IRCC’s clients (e.g., temporary residents, refugee claimants and protected persons, permanent residents) to be included in the PCTF.		DJR: New Section 2 added.
6	General, 1027	We need more clarity regarding conformance criteria, assessment, certification, and governance. How does that all fit into this framework?		TRB: Agree. However, this document will evolve and improve from lessons learned in field testing.
7	138	Were both documents produced in collaboration?	Revise to be more precise.	DJR: Text removed.
8	146	Is there a copy of the PCTF Trusted Processes Worksheet that we can see?		TRB: Yes there is -- it is a work in progress. DJR: Text removed.
9	150, 529	If this document is to be technology agnostic it should not have a prescriptive solution. Should it have a list of reference architectures and industry technical standards?		DJR: Both sections reworded.
10	170	Maybe add the word "approved" in front of partner.	"Canadians will be able to choose any approved partner".	DJR: Changed.
11	189	Do we think we will achieve the endorsement of DIACC in developing the PCTF as well?		TRB: To be resolved.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
12	211, 512	In the beginning we are talking about standards and later we are not talking about standards again. The discussion on standards seems incomplete as it doesn't mention technology or interoperability (process standards, data, technology standards).	Change line 512 to be more consistent with line 211.	TRB: Agree. These may be detailed in the conformance criteria or implementation guides.
13	215	All instances mentioning privacy should also include security.		TRB: Security issues are covered by the Security Frameworks in place.
14	216	What is the purpose of this section if it is only mentioned here?		DJR: This section has been merged into Section 4.3 (thus, <u>new Section 4.2</u>).
15	224 - 251	Section 4.3 should be removed as it is too technical, transient, and speculative.		TRB: Noted. This section is for informative purposes. Keep for now.
16	231 - 232	A person will not be issued one password per federation.	Replace with "credential"?	DJR: Changed.
17	252	Suggest trying to ground this section with evidence to help support claims being made.		TRB: Noted.
18	275	Extend existing sentence ending with "...fairness for all."	"...fairness for all while ensuring their personal and private information is secured and protected at all times. "	TRB: Agree. DJR: Text reworded.
19	280	The reference to digital ecosystem is too broad. Need to focus and qualify that it is in support of a digital identity ecosystem.	"...respecting Canadian digital identity ecosystem"	TRB: Agree. We should use the term "digital identity ecosystem" throughout the document. DJR: Changed.
20	282 - 283	Suggest re-wording, sounds awkward.		DJR: Text removed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
21	284	Observation: Is the PCTF also encouraging Canadian government institutions to invest in the establishment of public assets? May want to add that as a bullet point		TRB: Agree. DJR: Bullet added.
22	285 - 298	Formatting of bullets and numbers is not consistent throughout the document.		DJR: Noted.
23	285 - 286	Break this bullet into two points:	1) ensuring the digital ecosystem is trustworthy for end users; and 2) ensuring the digital ecosystem is fair, innovative, and competitive environment	DJR: Changed.
24	294	Wording (uniform and user-centric) is not used elsewhere in the document.	Suggest using Pan-Canadian.	DJR: "user-centric" removed.
25	295	The use of the word "standards" may not be accurate. Instead, are they not more like rules/guidelines for participation. The term standard may be confused with "technical standard".		TRB: Change to "standards, guidelines, criteria, and practices that are..." DJR: Text reworded.
26	304	Rather than writing all the principles perhaps just discuss common themes to avoid repetition.		DJR: Text changed.
27	304	Guiding Principles: This section has good content, however, it should be more concise and the principles should not be divided by organization. Choose the top principles and highlight them.		DJR: Text changed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
28	306 - 307	This section contains guiding principles/requirements for both the PCTF and the Canadian digital ecosystem. If 4.7's preface is kept, it should cite both of these concepts, not just the PCTF.		DJR: Text changed.
29	309	Specify what the guiding principles were made for: the PCTF? the Canadian digital ecosystem?		DJR: Text changed.
30	315	Is a duplicate of 311.		DJR: Text removed.
31	317	Is a duplicate of 313.		DJR: Text removed.
32	320 - 321	Language is only person, expand scope to organizations.		DJR: Text removed.
33	320	Out of place.		DJR: Text removed.
34	321	Add more specific wording to clarify the issuance of "what"?	"...for the issuance of foundational evidence of identity must continue..."	TRB: Agree. DJR: Text removed.
35	322	Section on Digital Standards of Government of Canada is not about identity. It is not relevant.	Should be removed.	DJR: Text removed.
36	322	What is the relevance of this section and reference to federal government standards? Makes it appear as if PCTF is a federal government thing only. Besides, provinces like Ontario have their own digital standards that pre-date those of the federal government. These are too generic and do not add any specific value to this document.	Remove from document.	TRB: Agree. DJR: Text removed.
37	323	Specify what the guiding principles were made for.	"...published the following digital standards for services in the digital age:"	DJR: Text removed.
38	357	Why is this included?	Suggest removal as this is focused within IMSC.	DJR: Text removed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
39	357	Similar to previous comment about the digital ecosystem. Qualify it as a digital identity ecosystem instead.	Change Title to: "Requirements of the Digital Identity Ecosystem". Change wording throughout the document to reflect "digital identity ecosystem"	TRB: Agree. DJR: Text removed.
40	396	Extend the last sentence to include realization of savings through cost avoidance or efficiencies.	"....sources of revenue or realization of savings through cost avoidance or efficiencies. "	TRB: Agree. DJR: Text removed.
41	401	Reference to "...personal abilities."...should we explicitly call out accessibility requirements?		TRB: Change "regardless" to something like: "respecting internationally accepted guidelines for accessibility". DJR: Text removed
42	430	Extend the paragraph with additional messaging on broader market participation and innovation.	By adopting clear and open standards, it establishes fair and equitable market conditions for participation and innovation to take place.	TRB: Agree. DJR: Text removed.
43	451	What are the trust marks?	Add definition if term is to be used.	DJR: Text removed.
44	451	Minor edit: Add the word "that"	"...while services that are not..."	DJR: Text removed.
45	456	The title (words used) of this section does not match the description in the following paragraph. Both are important, and each should be discussed		TRB: These are old DIACC principles; perhaps they should be removed. DJR: Text removed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
46	456	The DIACC's Principle #10 is ambiguous. What kind of data transfer is implied in the title - the one without a user's consent? The title is also contradictory - it states that an organization is discouraged to build its own identity database but at the same time the data transfer between organizations should be minimized, where will the data come from in this case?		DJR: Text removed.
47	463	The title of this section is the same as the Major Section Title on line 304.	Reword the subsection title, perhaps starting with DIACC.	TRB: Agree. DJR: Section 4.7.3 removed.
48	463	The points raised as key goals and objectives is the same as those identified and elaborated on in section 4.7.3. There is no new value being added by having these here. They are purely duplicative in nature.		TRB: I think we should remove this whole section. DJR: Section 4.7.3 removed.
49	464	Even if these are the authoritative and most recent principles created by DIACC, it should still be stated where these came from, just as the other principles in the section have a description line just below their title.	"In 2019, the DIACC proposed 10 guiding principles for the PCTF:"	DJR: Text changed.
50	467 - 468	Should explain what "right to be forgotten" means.		TRB: Ask DIACC.
51	469	Simpler phrasing might be: "Minimize the number of identity information repositories and the complexity of data transfer between these sources." Less is more.	"Minimize the number of identity information repositories and the complexity of data transfer between these sources."	TRB: These are DIACC principles.
52	484	What will the governing controls look like?		TRB: These are DIACC principles.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
53	493	"todays connected world" should be "today's connected world"		DJR: Changed.
54	510		Section 5.1 should be renamed "Key Concepts" not Essential Elements. Elements are describing pieces of something larger. Key concepts are introducing some new terms and explaining what they mean.	DJR: Changed. Section 5.1 becomes "Overview of the PCTF" and (new) Section 5.2 "Key Concepts" added.
55	511	Section 4 seems to be lists of everything. Section 5.1.1 seems to be another list.	Move 5.1.1 into section 4 with the rest of the lists. Characteristics should be in a new section 4.8 or merged with section 4.6.	TRB: This section needs to be reorganized to improve readability.
56	514 - 518, 670	Do not use the language of the atomic and compound processes and go back to common functions which can be grouped in related categories. Do not enforce a strict hierarchy over these processes.		DJR: Text reworded.
57	515 - 516	Is it possible to make this more plain language?		TRB: Maybe.
58	516 - 518	Include what a compound trusted process can result in, just as it was stated that an atomic trusted process "results in a discrete state transition." Can a compound trusted process result in multiple state transitions, because it contains multiple atomic processes?		DJR: Section 5.1 reworded and (new) Section 5.3.4 reworded.
59	518	Does this "All of the trusted processes" mean both atomic and compound processes? Will there be separate certification processes available for all atomic and compound processes identified within the PCTF?		TRB: 1. Yes. TRB: 2. TBD.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
60	522	"Once a trusted process is certified, it can be relied on or 'trusted' and integrated into a larger trusted digital ecosystem platform." If a trusted process is not certified is it still trusted?	Stop saying Trusted Process when just the word process will do. Save the word trust for special occasions.	TRB: Agree. The use of "trusted" has been dropped except where considered important. DJR: Unnecessary occurrences of "trusted" removed.
61	523	The term "trusted" is used to describe other ecosystems. Are we implying that all ecosystems that have a reliance on or support the use of digital identities will be trusted? Will they all be subject to certification?		TRB: Describe as "other digital identity ecosystem platforms". DJR: Changed.
62	540	We need to have a clear definition of what type of events are deemed as foundational, thus leading back to a foundational identity. For example, what do we mean by "legal residency"? In the previous versions of Verified Person, only three (3) types of foundational events have been identified: Birth in Canada, Birth Abroad to Canadian parents, and Grant of Status (immigrants). The events such as legal change of name, death, etc. lead to updates to the foundational identity but do NOT create a new one.	Include a list of events that lead to the establishment of foundational identity. Recommended to adopt the event list that has been developed for the first version of the IMSC's Verified Person conformance criteria.	DJR: Definition of foundational identity changed.
63	541	The definition of contextual identity is too vague.	The concept should be described better with more examples to explain.	DJR: Definition of contextual identity changed.
64	544 - 545	Focus is solely on vital stats and IRCC for foundational identity.	Expand to include business registrars	DJR: Changed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
65	545	Include the acronyms of the Provinces and Territories (PTs) and Immigration, Refugees, and Citizenship Canada (IRCC), as it is the first instance of their use and their acronyms are used directly after in the diagram.		DJR: Changed.
66	554	It is not clear how the concepts of trusted processes, Digital Representations, components and foundational/contextual identity relate to each other.		DJR: (old) Section 5.1.5 moved up to top of (new) Section 5.2.
67	555 - 562	The whole paragraph reads like a legal document that may not make sense to a lot of people. Needs to be simplified in everyday plain language, with examples for the reader to understand the concept.		TRB: Agree, but we need to make sure that we keep the precision. This is an evolving area and I'd like to keep this in for now.
68	567	Instead of "receive valued services...", suggest to say "access valued services..."		DJR: Changed.
69	572	The reference to Figure 2 illustration: This is only applicable to the 2nd representation identified in line 569. Furthermore, the diagram needs an explanatory paragraph written in plain language and that is easy to understand. It should specifically describe the 2 digital representations as noted on lines 565 and 569 respectively.		DJR: Diagram removed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
70	573 - 574		Should be removed as it is speculative and not part of identity.	TRB: The current focus of the PCTF is identities of persons and organizations, and relationships, however we anticipate that the scope and application of the PCTF will evolve. This has been identified as a thematic issue and will be addressed in a new scope and application section.
71	573	Perhaps insert a sentence connecting identity domains, the previous section, to the concepts in this section. Such as: "Foundational and contextual identities are both Trusted Digital Identities. A Trusted Digital Relationship might be a contextual identity's relationship to a foundational identity."		TRB: A "trusted digital identity", as we have defined it in the PCTF consists of three compound processes: identity assurance, credential assurance, and informed consent. Foundational and contextual identities are inputs into these processes. No change for now.
72	575 - 577	Finally, it should be noted that the PCTF, in itself, is not a governance framework...	This section is confusing and requires further explanation. What is or isn't a governance framework and how does this relate to a trust framework? Perhaps this section belongs in another section 4.1	DJR: Text moved to (new) Section 5.1.
73	575 - 577	This does not specifically talk about Trusted Digital Representations.	Suggest this text belongs in the goals or objectives section.	DJR: Text moved to (new) Section 5.1.
74	575 - 577	This paragraph could belong under 5.1.1. "Characteristics," as it specifies the nature of the PCTF.		DJR: Text moved to (new) Section 5.1.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
75	575	Different definitions of what the PCTF is are scattered throughout the document. In some places it is defined as a set of policies and guidelines, even standards, which can be interpreted as being a governance framework; in others it is defined as an accreditation process. More clarity in terms of defining the purpose and the scope of the PCTF would helpful.		DJR: Text moved to (new) Section 5.1.
76	578	Figure 2 – may want to indicate what “0:n” represents.		DJR: Diagram removed.
77	578	Perhaps use plain language to explain this concept.		DJR: Diagram removed.
78	581	See note and recommendation in reference to line 572.		DJR: Diagram removed.
79	588	Minor edit.	"because they are already have established tools and processes"	DJR: Changed.
80	588	The term "component" is used for the first time. This would imply that it is one of many components that are being considered. Recommend we have a list of components identified upfront, as this would help to orient the reader and even provide structure/flow to this document.		DJR: "component" removed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
81	595	In the illustration/figure, why do we subject "All" federation members to all of the items? The responsibility and accountability of any ecosystem participant will be dependant on the role and service offering they bring. For example, why would "authorization" be applicable to all federation members, when conceivably one party may be playing the role of a trusted authority (e.g., a trust anchor for identity)? This has nothing to do with authorization.	If the red boxes are out of scope of the PCTF, they should be explicitly stated as such or even removed from the document.	DJR: Diagram changed.
82	595	Why do we need the red highlighted portion within the diagram for Relying parties. These are classic components that manage access and authorization to services. How that is done should not be in the purview of the PCTF. What is of interest to the PCTF is how a service would interface into the digital identity ecosystem (for purposes of consuming them) and how they would ensure privacy and consent of use of identity information. Although the PCTF does extend itself into the domain of relying parties (e.g., consent, privacy protection), it should not concern itself with authorization, access controls, and resource management.		DJR: Diagram changed.
83	600	Consider moving this illustration and discussion to an earlier part of the document to set up the context for Sections 5.12, 5.13, and 5.14.		DJR: (old) Section 5.1.5 moved up to top of (new) Section 5.2.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
84	601	"the PCTF consists of the three Trusted Digital Representations": This is contradictory to lines 153 and 563, where its stated that there are two trusted digital representations.	Suggest to either change previous mentions of trusted digital representation or to change this one. The illustration might have to be adjusted depending on how this is resolved.	DJR: Text reworded.
85	603	State plainly that this is intended to be the most common configuration of the PCTF trusted model. There are many configurations possible, using Trusted Digital Representations and Trusted Supporting Infrastructure, but this is determined to be the most common. For a new user, this might be confusing if no reference is made to another part of the document explaining what this common configuration is.		TRB: This diagram is intended to convey the highest level of abstraction. The concepts presented in the diagram are elaborated later in the document.
86	622	Change term "sectoral".	Revise to "public and private sector".	DJR: Changed.
87	641 - 657, 843 - 845	Remove these paragraphs as they are too prescriptive of how to use the framework and too technical.		TRB: Noted. This discussion is intended to be informative for the reader. No change for now.
88	659	Replace the words "is composed of" with "recognizes".	"Currently, the PCTF recognizes 21 atomic...."	DJR: Changed.
89	661	Provide a list/table of the 21 trusted atomic processes. It will help set the context for future parts of the document.		DJR: List added.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
90	669, 683, 685	Compound Trusted Processes: The way they are described and illustrated, one would assume that a Compound Trusted Process has a single input and output state and that the transition from input to output state is performed by a set of contiguous atomic trusted processes that feed into each other. For example, in Identity Confirmation, Identity Maintenance is not involved in transitioning an Unconfirmed Identity to a Confirmed Identity. It is a separate process to maintain identity information.		DJR: Text reworded.
91	671	"Most important" is a strong statement. Some could argue for others.	Suggest rephrasing to simply point to Section 5.4 for Identity Assurance, Credential Assurance, and Informed Consent.	TRB: Add something like: "These three are the original conception of trusted digital identity, and have been used to develop policy requirements". DJR: Reworded.
92	671	Why are the three listed compound trusted process the most important ones? There should be a small paragraph that describes their importance and impact to the PCTF.		TRB: Add something like: "These three are the original conception of trusted digital identity, and have been used to develop policy requirements". DJR: Reworded.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
93	674	Is it the intent to have formally recognized trusted compound processes added to the PCTF over time? Can there be any variability in their configuration (i.e., options on the use of some of the atomic processes), or do all listed atomic processes within them have to be addressed?		TRB: Yes; that might come in an application guide.
94	675 - 682	Wouldn't you create an identity to make it trusted within the ecosystem?		TRB: These are examples.
95	697	Should existing processes be mapped on to atomic or compound trusted processes?		TRB: Existing processes should be mapped to atomic processes first, and then, if necessary, the atomic processes can be grouped into compound processes.
96	701	Column heading states "trusted process". Atomic or Compound?		DJR: "Atomic" added.
97	701	Trusted Process examples focus only on person.	Expand to include organizations.	TRB: Noted. Future versions will address this.
98	721	In reference to Input State on unattributed claims: "being claimed..." --> in what context does this apply? Is it identity information or the "resulting claim" itself that is being checked (that it has been issued to the rightful owner)? For example, identity information printed on a DL is already claimed by virtue of it being represented on a physical card/token.		TRB: The idea here is that it is "used" properly within a specific context (i.e., the user is using their own information).

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
99	721	<p>It is not clear how Physical Possession can reliably prove that the person presenting evidence of identity (i.e., ID documents) is the legitimate owner of those document. I may have found someone else's driver licence on the street so proving that I am in a physical possession of a valid document, does not make me a legitimate owner of it. NIST 800-63A mandates using biometrics for owner verification as the most reliable method today of verifying the identity owner for Medium and High Identity Assurance Levels. They discourage relying on knowledge-based confirmation for owner verification due to high amounts of personal information being now accessible freely, or for a fee in the public domain or in the black market.</p>	<p>Suggest removing Physical Possession from the list of acceptable Identity Verification methods. It more logically belongs under Evidence Validation.</p> <p>Suggest renaming "biological and behavioural confirmation" to biometric to be consistent with the industry terminology and make biometric or trusted referee confirmation a mandatory method for remote Identity Verification. KBC should be listed as optional when additional confidence needed.</p>	DJR: Identity Verification methods removed from text.
100	722	<p>How is evidence validation different from "identity validation"? Needs some clarity.</p> <p>In relation to the statement "...the process of confirming that an object...": Is this intended to be a list of items that can be accepted and subjected to validation? If yes, provide examples of such.</p>	<p>If the evidence validation means checking the authenticity and integrity of the presented physical evidence of identity (i.e., ID documents), and includes verifying the presence and integrity of the security features on the document (holograms, engravings, barcode, etc.) and/or the integrity of the cryptographically protected information on the document (i.e., in a chip), then it should explicitly state this.</p>	DJR: Section reworded.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
101	722	The term "validation" has already been used in the document (Identity Validation section) to refer to matching information against a source. Perhaps a different term to describe the evidence authenticity check should be used.		TRB: Noted. However this term has been qualified as "Evidence Validation". No change for now.
102	723	In determining active presence, will this run afoul of privacy laws prohibiting tracking user activity?		TRB: Agree that this is a possibility.
103	723	Process Name: Should this be "Presentation of Evidence" (or "Evidence Presentation"), or does it need to explicitly state "identity"?		TRB: We want to ensure that the identity exists over time.
104	724	In reference to "...exposed risk factor" at the conclusion of the Process Description: Should we separate out the "risk exposure" piece as a stand alone item? A change in a life event is not necessarily exposure to a risk factor. Exposure to risks is worthy of having its own discussion/section.	Also suggest rephrasing "exposed to a risk factor" to a more plain language "identity information has been compromised and/or used in a fraudulent activity".	TRB: I think we may need a section to talk about risk/threat models. All of these trusted processes are exposed to risks/threats. DJR: Section reworded.
105	725	What is "attributed actor". Not mentioned before or after this section. Should this be "identity"		DJR: Changed.
106	725	Term "attributed actor" is introduced.	Suggest definition or removal.	DJR: Changed.
107	725	What do we mean by credential? Can "claims" be a credential in this context?		TRB: We need further Working Group discussion on credentials and claims.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
108	726	<p>1. In the process description there is reference to "...service delivery context". This needs to be explained and elaborated.</p> <p>2. In reference to the entire "Identity Linking" atomic process, should this even be part of the PCTF as written here? The service provider (or relying party) would make the association between an identity and is presented with the service assigned identifier or other association mechanism of their choosing. Why would this be of interest to the PCTF? An argument can also be made that a service assigned identifier can also be a claim, and the claim is associated to an identity.</p>		<p>DJR: 1. Section reworded.</p> <p>TRB: 2. Yes, we need this. It clarifies responsibilities.</p>
109	726	Linking identity records across multiple sources presents a big privacy infringement and should be handled with great caution. Moreover, it is not clear why it would be in scope for the PCTF as it is more of a data quality/data cleansing exercise.	Suggest removing this process.	TRB: Noted. There are privacy implications. This should be addressed in a privacy impact assessment.
110	728	Grammatical error: ...assignment of a unique credential is to a subject...		DJR: Changed.
111	728	<p>1. A very specific definition of credential is needed to ensure common understanding and use of the term.</p> <p>2. Remove the word "is" in the second line of the process description.</p>	2. "...unique credential is to a subject..."	<p>TRB: 1. We have a definition of credential in Appendix B, but the definition is evolving. We need further Working Group discussion on credentials and claims.</p> <p>DJR: 2. Changed.</p>

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
112	728	It is hard to understand the difference between Credential-Identity Binding and Credential Issuance. Will there ever be a case when a credential can be issued without binding to an identity?		TRB: Yes, it is called a bearer credential (e.g., a hardware cryptographic key).
113	729	The term Authenticator needs a definition.		DJR: There is a definition of authenticator in Appendix B.
114	730	Add qualifying language on the Input State section at the end of the sentence to further qualify the pre-condition state requirements. Focus language on the credential being in good standing.	"...been assigned to the subject and is in good standing (e.g. its active) "	TRB: Noted. No change for now as this needs to be discussed further by the Working Group.
115	732	GCKey is not compliant with this requirement?	How does GoC solve this?	TRB: Not sure how this comment relates to the PCTF.
116	733	1. The term "Revocation" in the title: Is this not a status change for a credential? 2. In the input state: In addition to having a unique credential assigned to a subject, there is also an exception, event, or request for revocation needed to trigger the process.	2. "...assigned to the subject and an exception, event or request for revocation is initiated. "	TRB: 1. Yes. TRB: 2. This will be covered in the conformance criteria.
117	734	Input stated indicate Authenticator Bound Credential. Does this mean a credential cannot be authenticated unless there is an authenticator bound to it? That would only apply to authentication methods that require an authenticator.		TRB: Yes, there always needs to be an authenticator.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
118	734	<p>1. Input state: Possible wording change needed to ensure (a) that there is control over the credential, (b) that the credential type is acceptable for the transaction/service type requested, and (c) that the credential is valid (e.g., in good standing).</p> <p>2. Not all digital interactions will have the need for credentials like userid/password. Do we need to include these credential types in the PCTF? These would be part of the conveyance method, no?</p>		<p>TRB: 1. Agree with (a); (b) and (c) are covered in the conformance criteria.</p> <p>TRB: 2. Yes, we need this as part of the PCTF as issuers could include credential service providers. Also, "credential" is sufficiently abstracted that userid/password are just one of many methods that can be specified in the conformance criteria.</p>
119	736, 737, 738, 741, 742	Aren't these addressed in the Notice and Consent component?	Do these atomic process replace the previous Notice and Consent component? Is it applicable to all federation members? Or is it a part of a specific Trusted Digital Representation?	TRB: Yes. Applicability depends on context.
120	736	Formulating a Notice and Requesting Consent should be combined in the same atomic process.		TRB: Although they may be combined in practice, we are keeping them separate for now. Further discussion is needed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
121	736	1. Who would provide/issue the notice (i.e., Which party?) 2. Is this mandatory for all transaction types? How would this work in peer to peer scenarios? What about quick proof of age checks for purchasing alcohol?... (these are meant to be quick and simple transactions and we don't want to make these transactions so onerous that people don't find the use and convenience of using Digital IDs in these scenarios).		TRB: 1. and 2. Not sure. I believe the key requirement is that notice will be provided. Informed Consent is the least tested compound process.
122	737	Input state: Wording to include multi-variable option support (selected by the users).		TRB: Agree. We need to write a good input statement. DJR: Text reworded.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
123	738	<p>1. Regarding the issuance of the consent decision: Need to consider how this can work in a peer to peer scenario and who would be responsible for the issuance? Is there a better way to log this decision? (e.g., at relying party and at id owner end points during the transaction in some form of a log?).</p> <p>2. The wording used also implies a specific type of business model/solution approach by defining the order or sequence of events. For example, the process description states that "<u>Once</u> the consent information is <u>stored</u>, a notification..." this implies there are certain responsibilities assumed amongst the participants, that leads to a bias toward a particular implementation approach. We need to avoid this type of assumption.</p>		TRB: The Working Group needs to discuss this.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
124	741	In reference to managing a lifecycle of consent decisions: Would this be applicable in all interaction types? For example, is it relevant or practical to assume that this is necessary for interactions involving proof of age for buying alcohol? Would we expect LCBO in Ontario to manage consent decisions for all its customers? Can consent management be put in the hands of the identity owner instead? More discussion and elaboration on this topic may be needed.		TRB: The Working Group needs to discuss this.
125	742	How is this signature established?		TRB: This will be covered in the conformance criteria.
126	742	1. Is this process more about authorizing an event or action? Or is it more about having an electronic record or log in place that demonstrates consent to an action? 2. An argument can be made that an assertion of a trusted digital identity by the rightful owner is the equivalent of		TRB: 1. I think it's more about signifying explicit intent. TRB: 2. Agree that a TDI alone might suffice as an electronic signature, but it may still require a 'signature' on a document. We need to test this out.
127	750	Identity Assurance needs a definition and context setting for the reader.		DJR: New text added.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
128	758	Not clear what this means: "The conformance criteria and qualifiers are selected in accordance with what is required for a PCTF assessment and certification process." The qualifier and its corresponding conformance criteria should be selected by the relying party itself based on the results of the risk and privacy impact assessments of their business application, it should not be dictated by the PCTF.		DJR: Sentence removed.
129	771	The Identity Verification process includes confirming that the person presenting evidence of identity is the legitimate owner of it, and the identity Verification process relies primarily on biometrics (e.g., a photo comparison). It is not clear how a credit bureau can be a source of identity verification.		DJR: Text reworded.
130	782	Credential Assurance needs a definition and context setting for the reader.		DJR: New text added.
131	806	In DIACC's Notice and Consent Conformance criteria released for public review, the request and record consent are separate trusted processes.		DJR: Changed to line up with DIACC.
132	831 - 852	Repetition.		TRB: Noted. This section is intended to reinforce concepts for the reader. No change for now.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
133	832	States that Trusted Digital Identity Creation is a compound trusted process that consists of 3 compound trusted processes. This conflicts with numerous statements that indicate compound trusted processes are a grouping of atomic trusted processes (lines 670, 751, etc.). Confusing and inconsistent.		DJR: Section 5.3.4 reworded for consistency.
134	842	Digital identity can be conceptualized as a set of trusted process outputs...atomic or compound?		TRB: The structure of the proofs needs to be discussed by the Working Group.
135	862 - 868	Put up front.		DJR: Sentence removed.
136	863	No change needed, just want to highlight the use of the term "interoperate" and that it can be confused with technical interoperability. Need to ensure that we are not specifying the conveyance method and that the reader understands this.		DJR: Sentence removed.
137	869	The terms "credential" and "claims" are used interchangeably in the document which can be confusing to a reader. Suggest providing definitions for those terms		TRB: We need further Working Group discussion on credentials and claims.
138	877	Spelling mistake: claimers should be "claims"		DJR: Changed.
139	877	Replace the word "claimers with "claims".	"issue claims to others..."	DJR: Changed.
140	889	Replace the word "is" with "in".	"...can assist in developing..."	DJR: Changed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
141	892 - 895	Should the PCTF be broadened in scope to include education or professional claims at this point in time? What is the risk of leaving this unspecified now. This seems common and should be dealt with sooner rather than later.		TRB: Agree. This needs to be addressed in the next iteration.
142	896	This entire section seems to muddy the waters. The previous section defines 4 high level roles and this section proceeds to call them something else.		DJR: Section 5.6.1 changed to refer to "stakeholders".
143	901 - 910	More clarity needed in this entire section with clear separation/distinction between Identity Assurance vs. Credential Assurance vs. TDI providers. Need to include real world examples with plain language definitions to ensure understanding of the differences.		TRB: Agree. We will do this in the next iteration.
144	901, 924	Identity assurance provider is undefined.		DJR: Definition added.
145	908 - 909	What does "full package" mean?		TRB: Change to "end-product". DJR: Changed.
146	908 - 909	What is meant by "full package"?		TRB: Change to "end-product". DJR: Changed.
147	924	Table may need to be updated based on understanding and common definition of role types as noted in the previous comments about clarifying them.		TRB: As a result of previous changes, the table does not need to be changed.
148	948 - 949	Thought there was only one trust framework.		TRB: This is referring to the international context.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
149	959 - 962	Language is only person, expand scope to organizations.		DJR: Text changed.
150	968, 975, 982, 997, 1005	Interesting information, but each section seems to be presented in isolation. How does it relate to PCTF? (e.g., if an entity is using Pan Canadian LOA and another is using NIST, how do they agree on requirements in the absence of mapping table?)		TRB: This is being addressed in the Detailed Worksheet (a work in progress).
151	968	Who will decide what qualifiers from the 4 options listed in the document will be included in the conformance criteria?		TRB: This is determined by the parties involved during the assessment process.
152	971 - 981	How does one define some vs. high or substantial vs. high?		TRB: The determinations are specific to the trust frameworks.
153	1016	Delete the word "be".	"...algorithms are be used."	DJR: Changed.
154	1017 - 1020	What is the difference between the section on Recognition and Capacity? They appear to be very similar and redundant. For example, if TBS recognizes the CA, that implies that the CA has the capacity, no?		TRB: This is straight from our guidelines. This is kind of like a "horse and carriage" relationship: "recognition" follows demonstration of "capacity".
155	1027	Suggest moving the Assessment Process to the top as it provides a clear description of what the purpose of the PCTF is and how it is supposed to be applied in practice		TRB: Noted. May reconsider overall document flow in a later version. No change for now.
156	1032 - 1033, 1037	Suggest saying province/territory instead of just province.		DJR: Changed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
157	1040	Not clear why an individual would be reimbursed for health benefits they received. What kind of health benefits are implied - from a private insurance provider or from a provincial health authority?		DJR: Sentence removed.
158	1117	The reference to examples of Levels of Assurance: The attained level of assurance should be part of the assessment of qualifications and should be an output of the process.		DJR: Bullet changed.
159	1380	There is no such thing as an anonymous credential. We think that they are trying to say is that it is a credential bound to a low assurance identity. That term is not used anywhere in this document so why is it in the glossary?		TRB: No change for now.
160	1380	Authenticator definition is inconsistent with credential assurance trusted processes line 729, 734. Should be used to authenticate the claimants credential not identity.		TRB: This is part of a larger issue which the Working Group needs to discuss.
161	1380	Would like to have seen a definition of digital ecosystem and PCTF.		TRB: Not necessary.