No.	Line(s)	Comment	Suggested Change	Disposition/Comments
1	185	Attempt a definition.	"defined as all organizations registered and operating in Canada, as well as inactive organizations, for which an identity has been established in Canada"	DJR: Text changed.
2	211	Focus is on person.	Be inclusive of organizations here.	TRB: This only applies to persons.
3	280	Says "focussing".	Change to "focusing".	DJR: Text changed.
4	320	"choice, control, and convenience" -- and transparency about what is done with their data?		TRB: These are DIACC principles.
5	374	Uncertain what a discrete state transition is.	Provide background information.	DJR: Text changed.
6	376	Uncertain what is meant here.	More plain language.	TRB: Not sure what you mean.
7	382	Add: Continuous evaluations over time to maintain the highest level of security and confidentiality.		TRB: This will be dealt with in the assessment methodology.
8	437	Focus is on person.	Be inclusive of organizations here.	DJR: Text flagged for changes.
9	466	What about re-certifications? Under what conditions should it be done -- time period, people change?		TRB: This will be dealt with in the assessment methodology.
10	582	Table is only focused on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
11	597	Table is only focused on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
12	599	Table is only focused on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
13	602	Table is only focused on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
14	604	Table is only focused on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
15	619	Add new atomic process: Traceability of Attestations (insert after Check Signature): - A security enhancing mechanism and process to help detect from which situation data were extracted from a secure source - In case of leaks, these characteristics help identify the original place where the data was legitimately retrieved, enhancing the ability to find the unauthorized access causes/sources.		TRB: This requires further analysis.
16	620	The notice should also state if revocation of consent deletes (or not) the data that was there during the original consent period. Public sector may need to retain the information because a cost was incurred; private sector may wish to delete the data.		TRB: This requires further analysis.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
17	620	Add new atomic process: Review Data Usage (insert after Formulate Notice): - A process by which a subject can review the usage of his/her data by the different employees to whom the consent was given (and also reasons for using the data; which may be a lot to add, but will be clearly more transparent). - Allowing a subject to view what companies/organizations/public bodies are doing can help quickly mitigate leaks. - The mechanism must have provision regarding law-enforcement situations (not to entail national security or police investigations, yet, in respect of privacy concerns -- likely linked to how a warrant is required to tap a phone line. This mechanism must also ascertain the way that warrants will be revealed to the subject of the warrant).		TRB: This requires further analysis.
18	621	Table is only focused on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
19	629	Add new atomic process: Delegation of Decision (insert after Revoke Consent): - To an employee of a trusted partner or trusted digital organization (i.e. in-person, face to face, service for which the employee accesses data; as a bridge between digital and analog worlds). - To another trusted individual. - To a not-yet-trusted individual for which the trusted process must be applied.		TRB: This requires further analysis.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
20	630	Add new atomic process: Propagate Change (or a better process name) (insert after Delegation of Decision): - A process that helps a citizen specify to whom/how/what changes made to his/her personal information (or program specific personal information) will be propagated to other relying parties - e.g., A citizen moves from one province to another, or one city to another; how does the citizen control/specify how said information travels between relying parties of the PCTF? Do all partners need to wait for the citizen to "tell them" the new information? - Like expiration of consent, this should be made an atomic process in order to clearly document the lifecycle of personal information change		TRB: This is part of the Identity Maintenance atomic process.
21	765	Consuming a claim may be a way to ensure that a digital store is legitimate.		TRB: Agreed. This is implied in the text.
22	773	It is not clear what constitutes an infrastructure provider. Based on the definition provided, could not a claims provider or claims consumer also be an infrastructure provider?		TRB: Yes. DJR: Text added to explain that an entity can be more that one stakeholder type.
23	779	"other contextual identity-related claims" -- instead of non-identity.		DJR: Text changed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
24	823	Sections 5.7 and 5.8 are difficult for the reader, not because of the content, but because of the order of the content. We first read about the Conformance Criteria and their details; then other important details, like LOA; then mapping to other standards -- before going to a more general reading (the assessment process of 5.8).		TRB: Agreed. DJR: Sections 5.7 and 5.8 flipped.
25	825	"and maintain"	Change to "and maintain through time".	DJR: Text removed previously.
26	828 - 829	Focus is on person.	Be inclusive of organizations here.	TRB: This is an example.
27	844	Focus is on person.	Be inclusive of organizations here.	DJR: Text flagged for changes.
28	860	We should not put this as a separate section. We should map eIDAS to LOA: eIDAS low = level 1-2 (e.g., electronic declaration of traveller, for traveler advisory messages); eIDAS substantial = level 3; eIDAS high = level 4.		TRB: Disagree.
29	867 - 881	This section is particularly technical.	Provide background information and note its application within the wider PCTF.	TRB: This is a proposed standard.
30	867	Again, instead of being a separate section, I think this should be in a mapping table.		TRB: Disagree.
31	882	Again, this should be in a mapping table. Ideally, we should map the FAL level to the PCTF LOA and eIDAS.		TRB: Disagree.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
32	890	This section presents more of a "problem" since the PCTF wants to stay technology agnostic, yet some of these regulations describe a technology. Maybe put this text in an annex related to the Create Signature and Check Signature atomic processes?		TRB: While the conformance criteria may be technology-agnostic, the qualifiers might not be.
33	916 - 923	I would indent or place this text in a box to stress that these are examples; otherwise other participants may feel excluded (cities, private organizations).		TRB: A more diverse set of examples will be provided in the next iteration of the document.
34	919	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
35	947 - 954	Interesting white box approach (i.e., known content). My first thought would have been a black box (look at it independently) to keep things separated and give more room to find differences between the solution team and the assessor team.		TRB: Noted. As the assessment process matures a more formal team structure will develop.
36	955	What about renaming section 5.8.3 to "Assessment Guide Excerpt"?		DJR: Section renamed to "Overview of the Assessment Process".
37	986	This figure doesn't seem to add much value here. Should it be placed elsewhere?		DJR: Figure renamed.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
38	991	"the relying party may wish to issue..." -- I think we missed a concept here. A relying party was defined as someone trusting someone else. A Letter of Acceptance cannot practically be created by every relying party... No? I toyed around with this idea: - federal government assesses a certain company to give level 3 certifications to others. - Only public bodies can give level 4 certifications. Accreditation vs. Certification on the next page is a good concept; I feel "the relying party" here was a leftover from a previous edit?		TRB: This requires further analysis.
39	992	"This letter is similar..." -- Should "authoritative" parties be the same OR be different than accreditation bodies? We should standardize the document around one of these words to determine "who is the highest level authority" (multiple authorities, like multiple VSOs)		TRB: This requires further analysis.
40	1004	Excellent section, but the whole of section 5.8 could be made better with a reorganization of the order (see comment above). 5.8.4 would also need to be eventually expanded to specify who can be an accreditor or who can be a certification body.		TRB: Agreed. DJR: Sections 5.7 and 5.8 flipped.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
41	1039 - 1062	Interesting, but not sure of its application here.	Potentially include in the beginning or remove.	TRB: This is only informative text.
42	1068 - 1072	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
43	1076 - 1089	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
44	1110 - 1116	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
45	1122	"program-specific personal information" -- Have we thought of a mechanism to allow an individual to monitor such information? For example, a person might have several medical records split between multiple doctors, clinics, hospitals, etc. In a digital world, having a way to recognize that they are all tied to the same identity could help a subject maintain an up to date health record.		TRB: This is program implementation detail.
46	1126 - 1128	"Organizations are advised to reduce the overlap..." -- Why, if both goals are stated?		TRB: This is program implementation detail.
47	1130	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
48	1141	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
49	1150	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
50	1155 - 1158	This factor could pose a risk in the long run. If all identifiers are more constant, identity theft will become "easier". Most programs should eventually provide a non-predictive constant identifier that cannot be easily guessed. All ministries (both federal and provincial) should accept a "unique use-once social insurance number" (UUOSIN) in place of the current social-insurance number. For example, a person applying to a new program would ask their main identity provider for a new UUOSIN that the identity provider will confirm to be true, unique within that population, constant for a particular program, and non-predictive. The idea of non-predictive-use-once identifiers came from Pay Pass and the like, which ask the Credit Card issuer for a randomly generated temporary card number that is recognized by the seller, yet, cannot be used again elsewhere.		TRB: Agreed. There have been recent developments in ephemeral pair-wise identification techniques and decentralized identifiers.
51	1175	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
52	1179	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
53	1181	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
54	1186 - 1194	See comments above (re: Section 6.4.1, lines 1155 - 1158) about the problem of the widespread sharing of assigned identifiers.		TRB: Agreed.
55	1189	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
56	1197	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
57	1202	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
58	1207	"authoritative parties and relying parties" -- See comment above about "what word to use for the top authority".		TRB: This requires further analysis.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
59	1212 - 1214	This text is clearly referring to "foundational identity information" which has different considerations than contextual identity information. Perhaps put a section title and add a second section about contextual identity. Foundational identity is more "constant", so a date of when the information was found to be true is "not" that important. For contextual identity information, the date at which point the information was true is important. Each program needs to determine how recent contextual identity information must be before		TRB: This requires further analysis.
60	1214	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
61	1220	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
62	1223	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
63	1233	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
64	1237	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
65	1239 - 1241	This is a good name for the process that was missing from Section 5.4 (i.e., the Propagation of Change atomic process).		TRB: This is part of the Identity Maintenance atomic process.
66	1247 - 1251	Focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
67	1260	Definition of Assigned Identifier: focus is on person.	Be inclusive of organizations here.	DJR: Text changed.
68	1260	No definition of Discrete State Transition.	Include definition or remove term.	TRB: Definition not needed.
69	1260	Definition of Foundation Name: Focus is on person.	Be inclusive of organizations here.	DJR: Text changed.
70	1260	Definition of Foundational Evidence of Identity: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
71	1260	Definition of Foundational Identity: focus is on person.	Be inclusive of organizations here.	DJR: Text flagged for changes.
72	1260	Definition of Identity Claim: focus is on person.	Be inclusive of organizations here.	DJR: Text changed.
73	1260	Definition of Identity Information: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
74	1260	Definition of Identity Information Notification: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
75	1260	Definition of Identity Information Validation: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
76	1260	Definition of Identity Presentation: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.

No.	Line(s)	Comment	Suggested Change	Disposition/Comments
77	1260	Definition of Identity Resolution: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
78	1260	Definition of Identity Verification: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
79	1260	Definition of Knowledge-Based Confirmation: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
80	1260	Definition of Physical Possession Confirmation: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
81	1260	Definition of Supporting Evidence of Identity: focus is on person.	Be inclusive of organizations here.	TRB: We will be incorporating organizations into the next iteration of the document.
82	1260	Definition of Trust: focus is on person.	Be inclusive of organizations here.	DJR: Text changed.
83	1270	Will Verified Organizations and ISED be included here after it is integrated?		TRB: Yes.