



«Anti-Counterfeiting Tools»

ISO/PC 246

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Assistant:

Maxine BENACOM

Direct line: + 33 (0)1 41 62 83 06

maxine.benacom@afnor.org

Your contact:

Clément CHEVAUCHÉ

Direct line : + 33 (0)1 41 62 82 79

clement.chevauche@afnor.org

British comments on ISO CD 12931

DOCUMENT TYPE

Comments

DOCUMENT SOURCE

British Committee

COMMENTARIES

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FOLLOW UP

For consideration at the next ISO/PC 246 meeting

BACKWARD POINTER

N045

Template for comments and secretariat observations

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1	2	(3)	4	5	(6)	(7)
MB ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of com- ment ²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
ALL GB	Introduction	page VIII para 3	ed	Clarity, avoid repetition, syntax	Change Establishing the authenticity of a material goods, in other words recognizing that the material good is 'genuine or forged' in order to demonstrate whether it is a counterfeit, To Establishing the authenticity of a material goods, in other words recognizing whether it is genuine or fake	
	1 Scope	para 2	te	Clarity	After first sentence, add: It is intended to guide such organisations in the assessment of the counterfeiting risks they face, the determination of the categories of authentication elements they need to combat those risks, and the criteria for selection of authentication elements which provide those categories.	
		Para 5	ed	Clarity, simplicity	Change This document applies to material goods. It is not intended to apply to for example: goods used in the financial sector, official administrative papers, identity documents or to downloadable products. To This document applies to material goods, not documents, software or digitally-published copyright items.	
			te	Inclusiveness of the new statement	Insert new para: Nor does this document apply to technologies or systems designed for the tracking and tracing of material goods. Track and trace methods have a	

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2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

NOTE Columns 1, 2, 4, 5 are compulsory.

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					role in combating counterfeiting of material goods inasmuch as they provide for better monitoring and control of the legitimate supply chain for material goods and therefore help to prevent the introduction of diverted or counterfeit product in to that supply chain. But track and trace does not cover the illicit, or 'black', supply chain, where it is critical to be able to determine whether a material good is genuine or not, in the field and often without telecommunications available. Track and trace on its own does not provide the ability to do this and so it is not an authentication solution and is therefore outside the scope of this document.	
				Comprehensiveness of the introduction	Insert new para Recognising the different environments in which the determination of a material good's authenticity will take place, this document encourages the use of a <i>layered approach</i> in the use of authentication solutions, whereby solutions which deliver different functions are used together. In this regard, authentication solutions and track and trace solutions complement each other as components of a layered solution as the most effective approach to combat counterfeits of material goods.	
	3.1.1		te	PC246 has agreed and the draft states that counterfeits are not limited to the infringement of IP, so it is not appropriate to refer only to 'rights holder'.	Replace attack perpetrated by persons or entities that are not directly or indirectly linked with the rights holder With attack perpetrated by persons or entities directly or indirectly linked with the legitimate manufacturer, originator of the good or rights holder, off, subcontractor, supplier ...	

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				new definition	examiner - see 'inspector'	
	3.1.2		te	As above	Substitute: attack perpetrated by persons or entities that are not directly or indirectly linked with the legitimate manufacturer, originator of the good or rights holder	
	3.2		Te	As above	Substitute material good produced under the control of the legitimate manufacturer or originator	
			te	New definition required for clarity	New definition Combined authentication elements - see layering	
	3.7		ed	clarity	Insert: counterfeit (noun)	
	3.7		te	modification is not counterfeiting; replication is.	Replace "modification" with "replication".	
	3.8		ed	As above	insert: counterfeit goods/fake goods (noun)	
	3.8		te	Counterfeits are not limited to goods protected by IP..	delete: covered by the protection of one or more intellectual property rights	
	3.9		ed	clarity	amend to: covert authentication element authentication element which is hidden from the human senses until the use of a tool by an informed person reveals it to their senses or else allows automated interpretation of the element.	
	3.10		ed	Common usage	Amend to: false acceptance rate (or false accept rate)	
	3.11		ed	As above	amend to: false rejection rate (or false reject	

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					rate)	
	3.12		te	clarity and accuracy of meaning	of an authentication element, to mean it is detectable and verifiable only by specialist equipment	
	3.12		te	new sub-definition for clarity	also, the determination of authenticity of a material good by analysis of its component materials to determine that they are the exactly correct materials	
	3.17		ed	Clarity, accuracy and removal of redundancy	Amend to: exclusive rights given for a certain period of time to a person or legal entity over one or more items that are their creation or the result of their imagination or creativity	
	3.19-3.20		te	new definition	layering the combination of different functions (ie overt, covert, forensic - qv) in the authentication solution; this may be through the use of two or more authentication elements, each with a different function, or through the use of one authentication element that performs two or more functions	
	3.24		ed	Clarity, accuracy and relationship to 3.9	amend to: overt authentication element an authentication element which is detectable and verifiable by one or more of the human senses without resource to a tool (other than everyday tools which correct imperfect human senses, such as spectacles or hearing aids)	

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	3.25 & 3.26		ed	both definitions are unnecessary in this standard	delete	
	3.27		ed	accuracy	amend to: technical tool which is offered exclusively by the supplier of the authentication solution or by another supplier specifically for that authentication solution.	
	3.33		te	After due consideration we consider that introducing the concept of semi-covert confuses readers and users of authentication solutions. A solution is either overt or covert, not in-between.	delete	
	3.35		te	A new definition is needed before and to clarify use of the phrase "inspection tool".	New definition: Inspection tool A tool used for the examination of an authentication element	
	3.35		Ed	clarity and accuracy	Amend to: an inspection tool which either is used to reveal a covert authentication element to the human senses for human verification, or which integrates the functions required to be able to verify the authentication element independently	
	3.38		ed	clarity and accuracy; "centralised" is not necessary to the definition; "traceability" does not explain or define, it is a related word to "track and trace" and "secure the supply chain" is a derivative function, not a definition, and anyway is too categorical for this definition.	amend to: a means of identifying every individual material good in order to know where it is (trace) and where it has been (track) in the supply chain	
	4.1	3rd bullet of 2nd list	ed	typo correction	replace experimenting with experiencing	
	4.1	5th bullet of 2nd list	ed	clarity	amend to: How and by whom will the authentication process be performed?	

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	4.2	flow chart, top left box	ed	comprehensiveness	Ad: and consequences	
	4.4	Table	ed	As above	As above	
		para following table	ed	This statement is out of place here. The proposed new paragraph under Scope (see above) covers the statement more accurately and appropriately	delete	
	4.4.1		ed	We question whether the definitions of Standalone and Online are required here given that they are in the Definitions.	For discussion	
				Accuracy	Replace "Purpose built" with „Proprietary“	
	4.4.3		ed	Consistency	delete	
	4.4.4		ed	redundancy	Delete: though ease of verification and time taken for authentication may vary.	

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