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Document Title: **AFNOR Comments on the 30-Day Review regarding the Proposals to submit ECMA 385 (JTC 1 N 9451) and ECMA 386 (JTC 1 N 9452) to the JTC 1 Fast Track Procedure**

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Document Status: **This document has been forwarded to Ecma International for a response to the comments contained herein. The Ecma International response is due by February 20, 2009. Further processing of the Fast Track documents will be held in abeyance until the Ecma International response has been received. Once received, the response will be distributed along with an indication of further steps to be taken with regard to the Fast Track documents.**

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AFNOR Comments on the 30-Day Review regarding the Proposals to submit ECMA 385 (JTC 1 N 9451) and ECMA 386 (JTC 1 N 9452) to the JTC 1 Fast Track Procedure

The French mirror committee of JTC1 has circulated the abovementioned ECMA Standards to the relevant national committees for review and identification of any potential contradiction between the two ECMA documents and existing ISO, IEC and/or JTC 1 standards and projects.

Considering:

— the identification of perceived contradictions between both ECMA standards and ISO/IEC 14443 by the national mirror committees of SC 6 and SC 17 (see detailed description in annex)

— the spirit of Resolution 42 adopted at the JTC 1 Plenary Meeting in Japan, 2008-11-16, which states:

> **Resolution 42   Harmonisation of ISO/IEC 14443 standard with standards on Near Field Communications (NFC)**
>
> JTC1 recognises the establishment of a study group in SC 6 to address the harmonisation of the NFC standards and ISO/IEC 14443 with SC 17's collaboration through their ongoing liaison relationship. JTC 1 encourages SC 6 and SC 17 to continue this harmonisation effort between the ISO/IEC 14443 series of standards from SC 17 and the NFC standards from SC 6.
>
> JTC 1 encourages SC 6 and SC 17 to first draw up and agree on a list of technical points to address in order to perform this harmonisation. Ecma International as the originator of the NFC standards is invited to be actively involved in this effort.
>
> SC 6 and SC 17 are requested to report on the aforementioned joint harmonization effort at the next JTC 1 plenary in 2009.
>
> Unanimous;

— the fact that a dedicated Study Group on NFC has been set up under the authority of JTC1/SC6 to deal primarily with convergence between contactless cards and NFC standards

France recommends to further evaluate the perceived contradictions between ISO/IEC 14443 and ECMA 385 & 386 and solve them prior to initiating a voting process on corresponding Fast Track submissions. France suggests to convene a meeting as indicated in **13.4** of the **JTC 1 Directives** and proceed first with a harmonization as intended in the spirit of Resolution 42 mentioned above.

Annex

Description of the perceived contradictions between ISO/IEC 14443 and ECMA 385 & 386

ECMA 385 and ECMA 386 define a security layer above NFCIP1 (i.e. ISO/IEC 18092). ISO/IEC 14443 is a well deployed standard in a large variety of applications (transport, payment, access control, Identity, loyalty and so on). Therefore, It is advisable to define the security layer above these two standards. As it stands now, ECMA 385 and 386 address only Peer To Peer mode which is one of the 3 functioning modes of NFC. In doing so, NFC SEC may benefit to other modes such as card emulation mode (PICC) and reader mode (PCD) to address usual applications related to smart posters (tags) and contactless cards. For tag reading, it shall be noted that only tags compatible with type 4 as defined by the NFC Forum would be targeted.