



**«Anti-Counterfeiting Tools»**

**ISO/PC 246**

Date:

**2010-10-27**

Doc. Number:

**N 056**

**Assistant:**

Maxine BENACOM

Direct line: + 33 141 62 83 06

[maxine.benacom@afnor.org](mailto:maxine.benacom@afnor.org)

**Your contact:**

Clément CHEVAUCHÉ

Direct line: + 33 141 62 82 79

[clement.chevauche@afnor.org](mailto:clement.chevauche@afnor.org)

## **Final resolution of comments of CD ballot on ISO 12931**

**D**OCUMENT TYPE

Final resolution of comments

**D**OCUMENT SOURCE

ISO/PC 246 Secretariat

**C**OMMENTARIES

-

**F**OLLOW UP

For information

**B**ACKWARD POINTER

N048, N050, N051

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

CH2	Foreword		ge	"The present document is part of a <b>wider framework</b> wherein the proof that a material good is authentic or counterfeit can be obtained by any means whatsoever, and it was not drafted or designed to define a sole means of establishing proof for the relevant authorities."	Clarify the "wider framework"	Solved. "is proposed to become a part of a wider framework in related standards in the anti-counterfeiting field"
CH3	Foreword		ge	"However, any individual or organisation making use of this standard must comply with all national, regional and local laws."	As it is mentioned in the last paragraph of the Scope, no added value => remove	Solved. Sentence to be removed from foreword to scope. "However" is removed.
CH4	Foreword	Last sentence	ge	What are "simple and complex authentication solutions" ?	Replace "simple and complex" by "various"	Solved. Sentence removed.
DE 1	Foreword	Para 7ff	Te	This text should not be placed in the foreword, but should be part of the introduction.	Integrate para 7ff of the foreword into the introduction, omitting duplicated statements and shortening the text as a whole.	Solved. - Paragraph 7 is removed. - Add in paragraph 8, end of 1st sentence: "against counterfeiting".
DE 2	Foreword	Para 11	Te	Requirements (indicated by the use of the word "shall") cannot be part of the foreword, the introduction or the scope.	Change "shall" to "can"	Agreed.
DE 3	Foreword	Para 12	Te	This text was included as the resolution of a former German comment. The comment was intended to refer to privacy and data protection principles that have to be taken into account.	Reply the statement to the normative part of the standard and clearly refer to privacy and data protection guidelines and regulations.	Noted. Sentence moved to scope.
US1	Forward	Para 5	Ed	ISO 12931 was prepared by Technical Committee ISO/TC 246, <i>Anti-counterfeiting tools</i> , Subcommittee SC , .	ISO 12931 was prepared by <i>Project</i> Committee ISO/PC 246, <i>Anti-counterfeiting tools</i> .	Agreed.
CH1	General		ed	The verb "must" is still used in many places.	Verify if allowed by ISO (Refer to Directives).	Agreed.

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

						<p>4.4.2Overt authentication elements must be difficult to copy accurately so → shall</p> <p>5.3.1: shall</p> <p>5.3.2.1: shall</p> <p>5.3.2.2 :shall</p> <p>5.3.2.6 : shall</p> <p>5.3.3.1 : shall and shall</p> <p>5.3.3.2.2 : shall</p> <p>5.4.6 : shall and shall</p> <p>5.5.2 : shall</p> <p>5.5.3.2.1 : shall</p> <p>5.5.3.3.5 : shall</p> <p>6 : shall</p>
JP0 2	General	All	te	<p>As described in the Introduction, this International Standard is intended to be a guideline, and not a requirement standard applicable to certification of product, service, organisation or other entity.</p> <p>On the other hand, in the text of this draft, 'shall', 'should' and 'must' are used in parallel. There seems to be no clear criteria where to use each of these words.</p> <p>'Shall' is used for requirement statements which should not appear in a guideline.</p> <p>Use of the term 'must' as an alternative for 'shall' is prohibited. See Directive Part 2, Annex H.</p>	Eliminate 'shall', and also 'must' as an alternative for 'shall'. Replace each occurrence of 'shall' and 'must' with 'should', after verifying it to be appropriate.	<p>Solved.</p> <p>Must has been replaced by shall when appropriate.</p>
CA2	Intro	Paragraph Five	Ed	The movement of material goods is increasing, is easier and often uses non-traditional channels	The global movement if material goods are increasing and often use non-traditional channels	Solved with US3
CH5	Introduction		ed	"Counterfeiting is" should not be exclusive for this section	Replace by "Counterfeiting leads to, for example :"	<p>Agreed. Replace with:</p> <p>Counterfeiting includes</p> <p>Add commas and full stop.</p>

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

CH6	Introduction		ge	Considering the parallel distribution channels as a conflicting situation for medicinal products, we consider that this sentence is unacceptable : "Counterfeiting needs to be kept separate from the question of distribution of authentic material goods via alternative business channels."	Counterfeiting risk shall include repackaging operations within the distribution chain.	Solved with US2. Replace with: "Counterfeiting needs to be kept separate from diversion."
DE 4	Introduction			Introduction is not consistent.	Delete "Recognition of authenticity" and subsequent note.	Agreed.
FR1	Introduction	§ on counterfeiting	te	A counterfeiting is an attempt to Intellectual Property Rights and a violation to national, regional or international laws	Please replace "counterfeiting is" with "Counterfeiting is all or any of the following". And remove "possibly".	Solved with CH5. Solved with replacement of "possibly" with "usually" in the 1 <sup>st</sup> case and removal of "possibly" in 2 <sup>nd</sup> .
FR2	Introduction	§ on counterfeiting	te	Definition is limited	Please add "of material goods": A deceit on the purchasers <b>of material goods</b> , new or replacement parts	Agreed.
FR3	Introduction	Last paragraph of first page	ed	Please avoid any misunderstanding with the previous paragraph.	Please replace "the problem" with "The phenomenon of counterfeiting"	Solved. Replace "problem" with "problem of counterfeiting"
KE1	Introduction	Paragraph 3, bullets	Ge	Counterfeiting is a violation of either national, regional or international laws and is an infringement of intellectual property rights	Delete the words <b>possibly</b>	Solved with FR1
KE2	Introduction	Paragraph 8	Ge	While counterfeiting seeks to bypass the legal provisions, in some instances the performance of the product may perform well against an existing standard	R-write the paragraph to read: <i>Counterfeiting seeks to bypass the legal provisions, and may not guarantee conformity and quality designed to enable professionals to release safe material goods.....</i>	Rejected.
KE3	Introduction	Paragraph 8	Ge	Emphasize on the reasons why customers may not be keen on the products. The trust may be in particular supply chain or in particular brands	...particularly because of <i>trust in a brand</i> .....	Rejected. Trust already includes trust in a brand.
KE4	Introduction	last paragraph	Ge	Communicate intention	<i>This standard is <b>not intended to constrain</b> the organization's choice of authentication technologies</i>	Agreed.
US2	Introduction	Para 5	Ed	Counterfeiting needs to be kept separate from the question of distribution of authentic material goods via alternative	Counterfeiting needs to be kept separate from the question of <del>distribution</del> <i>the diversion</i> of authentic	Solved with CH6. Replace with:

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comment<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

				business channels.	material goods via alternative business channels. We want to add the definition of diversion	"Counterfeiting needs to be kept separate from diversion."
US3	Introduction	Para 7	Ed	The movement of material goods is increasing, is easier and often uses non-traditional channels.	The movement of material goods is increasing, <del>is easier and often</del> may uses non-traditional channels.	Agreed. And solved with CA2. "The global movement..."
JP0 1	Introduction	Page iii, line 22	ed	The text reads as 'The ISO 12931 standard ...' Follow the style specified in the Directives, Part 2, 6.6.7.2.	Replace 'The ISO 12931 standard' with 'This International Standard'.	Agreed.
UK1	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	Agreed. Establishing the authenticity of a material good, in other words recognizing whether it is genuine or fake.
DE 5	Recognition of authenticity	Para 6	Te	The introduction of a standard is not normative and cannot contain requirements (shall-statements). Respect all regulations	Move requirement from introduction, combine with para 7 of scope Change text : "all this procedures will need to respect applicable national, regional and international regulations...."	Agreed. Sentence to be moved into the scope.
DE 6	Recognition of authenticity	Para 6-9	Te	The wording sounds like a "Scope"-wording.	Move paragraphs to Scope, remove shall-statements.	Agreed. To be moved at the end of scope.
DE 7	Recognition of authenticity	Para 8 and 9	Te	Neither the foreword, nor the introduction or scope can contain requirements (shall-statements)	Change wording into informative wording.	Agreed. To be moved at the end of scope.
CH7	Scope	Last sentence		"Some specific sectors" is too vague	Change to "Some industries and services"...	Agreed.
UK2	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 determination of the categories of authentication	Solved. Add: It is intended to guide such organisations in the determination of the categories of authentication

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

					elements they need to combat those risks, and the criteria for selection of authentication elements which provide those categories.	elements they need to combat those risks, and the criteria for selection of authentication elements which provide those categories, having undertaken a counterfeiting risk analysis.
UK3	1	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.	Solved with change of 1 <sup>st</sup> sentence. This document focuses on material goods.
UK4			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 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.	Solved. New paragraph added after "downloadable products." Nor does this document apply to technologies or systems designed for the tracking and tracing of material goods. Track and trace on its own is not an authentication solution and is therefore outside the scope of this document.
UK5	Intro			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	Rejected.

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

					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.	
FR4	Whole document		ed	Typo: Introduction, 5.3.1.5	Replace recognizing with recognising	Agreed.
JP1 1	2		Ed	ISO/IEC 15408-1,-2,-3 has already been published in version corresponded to CC version 3.1 in 2008 and 2009.	Replace from ISO/CEI 15408: CC version 3.1 dated September 2005. ISO/IEC 15408(all parts) Information technology — Security techniques — Evaluation criteria for IT security Delete ISO/IEC15408 from Bibliography in this case.	Solved. Move to bibliography. And list all existing parts.
CN1	2		Ed	Spelling mistake	Replace “ISO/CEI” With “ISO/IEC”	Agreed.
DE 8	2		Te	There is no need to force the users of this standard to use and buy this document. Standard is not mentioned in the normative text.	Move document reference to bibliography.	Agreed. All normative references will be moved to bibliography.
US1 5	3	definition		add “likelihood” from iso 31000 <jws-add... vs probability>>	Add the definition of “likelihood” ISO 31000. ISO 31000 2.1	Agreed.
CH8	3		ed	Definition of Counterfeiting is missing	Add definitions referring to official international organizations (WHO GDP 2010 Annex 5, TRS 957, WCO, Interpol, etc..)	Rejected.
CH9	3		ed	To do distinction between counterfeiting (IPR) and counterfeiting-crime (safety and public health)	Add definition of "Counterfeiting-crime"	Rejected. Crime is not noted in the document.
DE 10	3		te		Make 3.4 subpara to 3.3 (3.3.2) Make 3.5 subpara to 3.3 (3.3.3)	Agreed. Include 3.37
DE 9	3		Te	def. of “authentication tool” is missing	Include definition, use text of 3.37, remove 3.37	Replace technical tool with

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comm ent<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

					Build subparagraph to 3.3 (3.3.1)	authentication tool.
FR5	3	Definitions	te	Simple tool	Simple tool: Stand alone tool without any intelligence	Rejected. No occurrence in the document
FR6	3.1		ed	typo	Replace attempts with attempts	Agreed.
UK6	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, staff, subcontractor, supplier ...	Agreed for 3.1.1 internal attack: attack perpetrated by persons or entities directly or indirectly linked with the legitimate manufacturer, originator of the good or rights holder (staff, subcontractor, supplier).
UK7				new definition	examiner - see 'inspector'	Solved. No new definition. But the occurrence of examiner is changed into inspector.
UK8	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	Agreed.
UK9	3.2		Te	As above	Substitute material good produced under the control of the legitimate manufacturer or originator	Agreed.
UK10			te	New definition required for clarity	New definition Combined authentication elements - see layering	Withdrawn.
KE5	Definitions	Clause 3.4	Te	The authentication elements may include visual	<i>Tangible object, visual feature or information associated with a material good that ....</i>	Agreed.



Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

UK11	3.7		ed	clarity	Insert: counterfeit (noun)	Solved. Add (verb) and modify the definition as follow: To simulate, reproduce or modify a material good or its packaging without authorisation
UK12	3.7		te	modification is not counterfeiting; replication is.	Replace "modification" with "replication".	Withdrawn.
UK13	3.8		ed	As above	insert: counterfeit goods/fake goods (noun)	Withdrawn.
UK14	3.8		te	Counterfeits are not limited to goods protected by IP..	delete: covered by the protection of one or more intellectual property rights	Agreed.
DE 11	3.8		Te	The synonym fake goods is not used in the text. Can be deleted.	Delete "fake goods"	Agreed.
US1 3	3.8	Definition		<b>3.8</b> counterfeit goods/fake goods material good imitating or copying an authentic material good covered by the protection of one or more <b>intellectual property rights</b> . <<jws-focus on IPR not fraud??>>	Does not take into consideration trade secrets. <b>3.8</b> counterfeit goods/fake goods material good imitating or copying an authentic material good which may be covered by the protection of one or more registered or confidential <b>intellectual property rights</b> .	Agreed.
US4	Definition	3.9	Te	3.9 covert related to authentication elements, visible or invisible, coded or not, which verification has to be performed using a tool	<b>3.9</b> covert related to authentication elements, visible or invisible, coded or not, which verification has to be performed using a tool <i>or special knowledge</i>	Agreed. Add And/or special knowledge
UK15	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.	Solved. Add a new definition.
UK16	3.10		ed	Common usage	Amend to: false acceptance rate (or false accept rate)	Agreed.

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

UK17	3.11		ed	As above	amend to: false rejection rate (or false reject rate)	Agreed.
UK18	3.12		te	clarity and accuracy of meaning	of an authentication element, to mean it is detectable and verifiable only by specialist equipment	Solved. Definition becomes: 3.12 Forensic analysis Scientific methodology for authenticating material goods by confirming an authentication element or an intrinsic attribute through the use of specialized equipment by an skilled expert with special knowledge
UK19	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	
US5	Definition	3.12	Te	3.12 forensic related to authentication elements, visible or invisible, coded or not, which verification has to be performed using laboratory equipments	<b>3.12</b> forensic related to authentication elements, visible or invisible, coded or not, which verification has to be performed using laboratory equipments <i>or special knowledge.</i>	
KE6	Definition	Clause 3.13	Ed		<i>Authenticity as evaluated by the inspector</i>	Agreed.
US14	3.17	Definition		<b>3.17</b> Intellectual property rights exclusive rights given for a certain period of time to a physical person or legal entity over the creation of their minds and customarily divided into two main areas: 1 – copyright and rights related to copyright, 2 – industrial intellectual property <<jws-trademark? Copyright?	Need a more widely acceptable definition. <b>WIPO definition:</b> Intellectual property (IP) refers to creations of the mind: inventions, literary and artistic works, and symbols, names, images, and designs used in commerce.	Agreed.
CH10	3.17	Title	ed	Should be written in small letters.	Replace “Intellectual...” by “intellectual...”	Agreed.
UK20	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	Withdrawn.
UK21	3.19-3.20		te	new definition	layering	Withdrawn.

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

					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	
UK22	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)	Agreed.
UK23	3.25 & 3.26		ed	both definitions are unnecessary in this standard	delete	Agreed.
UK24	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.	Solved. New title: Purpose-built authentication tool authentication tool dedicated to a specific authentication solution
CH1 1	3.27	Title	ed	Should be written in small letters.	Replace “ <b>Purpose...</b> ” by “ <b>purpose...</b> ”	Agreed.
DE 12	3.32		Te	A new definition was agreed in DoC1 DE14	Change to: "Data that shall be protected against disclosure to unauthorized entities"	Solved. Data and/or knowledge that shall be protected against disclosure to unauthorized entities
UK25	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	delete	Agreed.

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

				covert, not in-between.		
UK26	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	Withdrawn. However, all definitions regarding tools are moved into the section "authentication tools"
UK27	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	Agreed. "authentication 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"
CH1 2	3.37	Title	ed	"authentication tool" is also used (See 5.4), but this definition is missing in Clause 3.	Add definition.	Solved with DE9 and DE10.
CH1 3	3.38		ed	Improve the definition	Modify to "A tracking system which enables traceability of lots during the distribution"	Solved. means of identifying every individual material good or lot(s) or batch in order to know where it has been (track) and where it is (trace) in the supply chain
UK28	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	
CH1 4	(3.39)		ed	"Secure track and trace" or "Secure trail" is missing	Add definition	Withdrawn.
CA1	4 General Principles	4.1 Intro Paragraph Eight	Ed	In which locations are we experimenting in counterfeiting and how are the counterfeits being distributed.	In which locations are we experiencing counterfeits and how are they being distributed.	Solved. in which locations are we <i>experiencing</i> counterfeiting and how are the counterfeits being distributed
US7	4 General principles	4 General principles 4.1 Introduction.	Ed	in which locations are we experimenting counterfeiting and how are the counterfeits being distributed?	in which locations are we <del>experimenting</del> <i>experiencing</i> counterfeiting and how are the counterfeits being distributed?	

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

		8 <sup>th</sup> Para third bullet				
US6	General Principles	4.1 Introduction, first sentence	Ed	Authentication solutions can come in a wide range of formats, from simple solutions to complex ones involving IT architectures.	Authentication solutions can come in a wide range of formats, from simple solutions to complex ones involving <i>Information Technology</i> architectures.	Agreed.
CA3	Intro	4.1 Intro Bullet 3		An y required information system	Any required information system	Agreed.
CH1 5	4.1	3rd line	ed	Rights owner is not a usual legal term	Rights holder	Agreed
CH1 6	4.1	1st list, 3rd line	ed	Typo	Correct is “ <b>any</b> ”.	Agreed
CH1 7	4.1	Second par.	ed	Typo	Correct is “ <b>including</b> ”.	Agreed
CH1 8	4.1	Last section	te	No added value and risk of ambiguity	Delete from "The level of performance..." to "(process and authentication)"	Rejected.
CN2	4.1	Paragraph2	Ed	Spelling mistake	Replace “includind” With “including”	Agreed.
DE 13	4.1	3 <sup>rd</sup> indent	Ed	Mistake	Change to: "any"	Agreed
FR7	4.1	3 <sup>rd</sup> bullet	ed	An y	Should be "any"	Agreed
US1 7	4.1	General Principles, introduction		As a strategy analysis, the following main questions to be addressed by the rights owners are : – what are the counterfeiting issues, the consequences and probability of the counterfeiting threat?	Change probability to “likelihood”	Agreed.  Please add capitals at beginning of bullets.
UK29	4.1	3rd bullet of 2nd list	ed	typo correction	replace experimenting with experiencing	Agreed
UK30	4.1	5th bullet of 2nd list	ed	clarity	amend to: How and by whom will the authentication process be performed?	Agreed
UK31	4.2	flow chart, top	ed	comprehensiveness	Ad: and consequences	Solved

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comment<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

		left box				Add a box with "Consequences of counterfeiting"
CH19	4.2	Inspection	ed	Overt – Semi-covert – Covert – Forensic	And/or should be added	Agreed and remove semi-covert in the box inspection
FR10	4.2	diagram	te	External data is not clear		Agreed Replace with supporting data.
JP12	4.2	Figure		This figure needs the title and figure number. This is based on ISO/IEC Directives Part 2, 6.6.5.	Attach the title, for example, "Figure 1 Functional block diagram of a typical authentication solution" under this figure. And change the first sentence as follows. The typical authentication solution is shown in Figure 1.	Agreed.
FR8	4.2	1 <sup>st</sup> §	te	The evaluation of health, safety seems to be ambitious	They together yield a true or false verdict or provide information that will enable to detect the possibility of fraud	Solved. They together yield a true or false verdict or provide information that will enable to detect the authenticity of the material good.
FR9	4.2	diagram	te	It was previously stated to use the term of material good	Product is to be replaced with material good	Agreed.
CH20	4.4	Table 1	ed	"Field available tool" and "Laboratory equipment" : Definitions are missing	Add definitions in Clause 3.	Solved with new table 1.
JP13	4.4	All paragraph	ed	ISO prohibits a hanging paragraph(no clause number) in ISO standard documents based on ISO/IEC Directives Part 2, 5.2.4.  There are same problems in 5.3.2, 5.3.3, 5.4, 5.5, 5.5.1, 5.5.2, etc.	Rewrite as follows From 4.4, 4.4.1 Categorisation of technical tools, 4.4.2 Overt category , ... To 4,4 , 4.4.1 General, 4.4.2 Categorisation of technical tools, 4.4.3 Overt category , ...	Agreed.
JP14	4.4	Table1		The site of table number and title is wrong based on ISO/IEC Directives Part 2, 6.6.6.	Move the table number and title from bottom of table to the top.	Agreed.

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex</b> (e.g. 3.1)	<b>Paragraph/ Figure/ Table/ Note</b> (e.g. Table 1)	<b>Type of comment<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

UK32	4.4	Table	ed	As above	As above							
UK33	4.4	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	Withdrawn.						
DE 15	4.4	Table 1	te	Tools for covert mechanisms may be available to the public in certain cases (e.g. testing of a light bulb may include testing of genuineness); thus “restricted” does not necessarily apply in all cases of covert; also, even forensic methods are very complex, in principle they are available to the general public.	<div>Remove 1<sup>st</sup> column and call the table “Inspection methods and categories of authentication solutions”; re-edit table</div> <div><div>Human only</div><div>senses</div><div>Technical tool</div><table><tr><td></td><td>Field equipment</td><td>Labor equipment</td></tr><tr><td>overt</td><td>covert</td><td>forensic</td></tr></table></div>		Field equipment	Labor equipment	overt	covert	forensic	Solved with new table 1.
	Field equipment	Labor equipment										
overt	covert	forensic										
DE 16	4.4	Para 3-5	Te	If last comment is accepted, then “Provision of Knowledge” section no longer relates to the table	Move “Provision of Knowledge” section to 4.4.6	Withdrawn.						
FR11	4.4	Restricted audience	ed	The title of restricted audience may need a plural		Withdrawn.						
FR12	4.4	Table 1	ed	One of the input of the table 1 is "inspection method".	Please place in the correct column.	Solved with new table 1.						
CH2 1	4.4.1	2 <sup>nd</sup> para.	te	Mode of operation is incomplete: Standalone, Online	Add counterparts: Mobile (like hand-held unit) and Offline	Solved. Standalone is kept and "off line" is withdrawn at the end of definition of standalone tool.						
FR13	4.4.1		ed	For question of editing, the sub-clause 4.4.1 should appear at the end of section 4.		Agreed.						
UK34	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	Withdrawn.						
FR14	4.4.2		Te	reader is not appropriate	Please replace with "tool"	Solved with new editing.						
UK35	4.4.3		ed	Consistency	delete	Solved with new editing.						

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

UK36				Accuracy	Replace "Purpose built" with „Proprietary“	Solved with new editing.
FR15	4.4.3		Ge	The present definition of semi-covert is covered by the definition of overt. Therefore it is necessary to clarify.	Please add in the 2nd sentence "with basic additional reader or equipment": These features are often verified using a person's senses possibly <b>with simple additional tool or equipment</b> or by physically moving the object.	Solved with new editing.
CH2 2	4.4.4	Last line	ed	...elements may need some training	Remove word "may"	Solved with new editing.
KE7	General principles	Clause 4.4.4, second paragraph	Ed		<i>Covert technologies exploit all kinds of physical, <b>electrical</b> or chemical effects</i>	Agreed
DE 14	4.4.4		Te	In DoC2 DE29 the following German Comment was agreed or supposed to be covered by the new wording. We don't see the change in the text and reiterate the following comment: Especially in covert applications the principles of data protection have to be fulfilled.	Include following sentence in a new section 4.4.6 (see DE 016, DE 019), cause this statement is applicable for all categories: "Particularly, where a covert application uses data that is or can be linked to a person, privacy principles and regulations shall be obeyed."	Agreed.
FR16	4.4.4		te	Datamatrix may be recognisable and does not give any information	Replace recognizable by interpretable	Solved with new editing.
UK37	4.4.4		ed	redundancy	Delete: though ease of verification and time taken for authentication may vary.	Agreed.
DE 17	4.4.5	Para 1	Ed	Forensic methods rather do depend on the availability of distinguished methods than on the knowledge of "system secrets" on a need to know bases.	Change 2 <sup>nd</sup> sentence to: The authentication elements may not be commonly known and/or easy accessible.	Solved with new editing.
DE 18	4.4.5		te	Change text accordingly to the Lausanne Meetings editing result.	"Inspecting a forensic authentication element generally requires the use of specialized tools in a laboratory setting, as it often involves either analyzing the material good itself or detecting and analyzing trace elements previously added to the material good or its packaging. The inspection process may often require exemplars of the original material good for a comparative analysis. Forensic	Solved with new editing.



Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

					authentication elements are usually analyzed by trained inspectors."	
DE 19	4.4.5	Last sentence	te	"To be acceptable by a legal authority, forensic evidence may need to be proved by accredited/notified third party laboratory" shall be applicable for all categories.	Move sentence to a new section 4.4.6 "Provision of Knowledge"	Withdrawn.
US8	4.4.5 Forensic category	Second paragraph	Ed	To be acceptable by a legal authority, forensic evidence may need to be proved by <del>accredited</del> notified third Party. <del>laboratory</del> .	The term "notified" is not one that is commonly used to recognize an authorized or accredited facility. "To be acceptable by a legal authority, forensic evidence may need to be proved by a third party. "	Solved with "a trusted third party".
FR17	5.1	1 <sup>st</sup> §	ed	Consistency of vocabulary	Please replace class with category	Agreed.
US18	5.1	Performance Criteria/ introduction		<b>Risk is a function of probability and severity factors. Risk analysis is the cycle of hazard identification, risk assessment, risk management and risk communication. This section defines the performance criteria, specification factors that are used by risk analysis systems.</b>	Change probability to "likelihood"	Agreed.
JP03	5.1	3rd paragraph	te	While this paragraph introduces concepts and terms of risk management, other texts of clause 5 do not mention risk management. The text has little value in this context.	Option 1: Delete the paragraph. Option 2: Add descriptions on risk management aspects using introduced terms of risk management to subclauses of clause 5.	Solved. Option 2 is preferred.
JP04	5.1	3rd paragraph,	te	The text reads as follows. Risk is a function of probability and severity factors. Risk analysis is the cycle of hazard identification, risk assessment, risk management and risk communication. Concepts and terms of risk management need to align with ISO 31000: 2009.	In case JP03 is accepted with Option 2, replace the text with the followings. Risk is a function of consequence and likelihood of events. Risk assessment is an overall process of risk identification, risk analysis and risk evaluation.	Agreed and keep the 3 <sup>rd</sup> sentence of paragraph.
CH23	5.2	2nd para., 2nd	te	"semi-covert..." is missing in brackets.	Add " <b>semi-covert</b> ..."	Withdrawn.

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

		sent.				
CH2 4	5.2	3rd para., 2nd sent.	ed	“two” is wrong. (There are three sections)	Replace “two...” by “ <b>three...</b> ”.	Agreed.
FR18	5.2		te	Last paragraph is an introduction to the next section and should be rewritten since the last editing has been released.	While the categories of criteria may be the same for different solutions, the use of different methodologies to authenticate is required. In recognition of this difference the criteria is separated into three sections. Section 5.3 will describe the criteria for the authentication element; section 5.4 will describe the criteria for the authentication tool. Section 5.5 will describe the criteria for authentication solution.	Agreed.
CH2 5	5.3	Title	ed	Should be written in small letters.	Replace “Authentication Elements” by “ <b>authentication elements</b> ”	Agreed.
DE 20	5.3		te	Characteristic criteria should be added.	<b>5.x not uncontrolled reuseable</b>	Agreed. New section 5.3.2.7 with following definition: Reuse authentication element without authorization.
FR19	5.3.1		ed		Please replace ; with ,.	Solved. Should be a comma. And last sentence becomes: Among the physical characteristics, the following should be considered.
FR20	5.3.1		ed		Please add that between "usage" and "must" And Replace must with shall.	Agreed.
US10	5.3.1.3 Durability characteristics	Second para	Ed	The specifier of the authentication solution shall define the conditions of usage must be considered based upon the required risk analysis. In addition, the life cycle of the material good may have a significant impact in determining the durability of the authentication capability.	The specifier of the authentication solution shall define the conditions of usage <del>must be considered</del> based upon the required risk analysis. In addition, the life cycle of the material good may have a significant impact in determining the durability of the authentication capability.	Agreed.
US9	5.3.1.3	Fourth bullet	Ed	- Aging	- Aging that <del>might</del> may result in a malfunction of	Solved.

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

	Durability characteristics			that might result in a malfunction of the authentication element over life cycle.	the authentication element over life cycle.	Aging that may result in a malfunction of the authentication element over the life cycle of the material good.
CH2 6	5.3.1.5	2 <sup>nd</sup> line	ed	- Machine readable	Replace “readable” by readability”	Withdrawn.
US11	5.3.1.5 Feature-linked physical characteristics	Last para	Te	A feature may be recognized as unique in two manners, one-to-one or one-to-many. A unique feature that authenticates a single item and is unique only to that item is recognised as one-to-one.	A feature may be recognized as unique in two manners, one-to-one or one-to-many. A unique feature that authenticates a single item and is unique only to that item is recognised as one-to-one. <i>A unique feature applied to many items is recognized as one to many.</i>	Agreed. A feature may be recognized as unique in two manners, one-to-one or one-to-many. A unique feature that authenticates a single item and is unique only to that item is recognized as one-to-one. <i>A unique feature applied to several items is recognized as one-to-many.</i>
DE 21	5.3.2.1	title	te	extend title	"Copy resistance and reverse engineering"	Agreed. Reverse engineering and copy resistance
DE 22	5.3.2.1	Para 1	te	"must not" is not allowed, wording as specified in ISO/IEC Directives Part 2 Annex H should be applied.	Replace: "it shall require investigations of an unacceptable level of effort to get enough information..." Add: "and to use this element to circumvent the product protection"	Solved. Sentence becomes: "It shall be extremely unlikely to acquire enough information to be able to successfully create / generate / manufacture an authentication element and to use this element to circumvent the material good protection."
DE 23	5.3.2.1	Para 2	Te	“may not” is not allowed in standards”, wording as specified in ISO/IEC Directives Part 2 Annex H should be applied.	Replace “may” with “shall” Add text: "it shall require an unacceptable level of effort to copy authentication elements without authorization."	Agreed. Replace the 1 <sup>st</sup> sentence with: "It shall require an extraordinary level of effort to accurately copy authentication elements."
JP0 5	5.3.2.2	1st sentence	ed	The term ‘tampering resistance’ should be ‘tamper resistance’, as used in the title of 5.3.2.2.	Replace ‘tampering resistance’ with ‘tamper resistance’.	Agreed.
CH2	5.3.2.3	Title	ed	In the previous version, the term “Hacking resistance”	Verify which term fits better: “Hacking” or	Noted. Replace compromise with

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comm ent<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

7				was used.	"Compromise".	"Alteration".
DE 24	5.3.2.5		Te	Requirement is too strong	Replace Para with: It should be possible to gain attack-sensitive information by intercepting the communication between the authentication element and any tool required to read or verify the element. Thus, the authentication element either should not communicate any attack-sensitive information with the tool or the information exchange shall be secured.	Solved. It shall not be possible to gain attack-sensitive information by intercepting the communication between the authentication element and any tool required to read or verify the element. Thus, the authentication element either shall not communicate any attack-sensitive information with the tool or the information exchange shall be secured.
CN3	5.3.3.1	Paragraph1		Spelling mistake	Replace "implemeted" With "implemented"	Agreed.
FR21	5.3.3.1		Ed	Typo	Replace implemented with implemented	Agreed.
FR22	5.3.3.2.2		te	Last sentence is not understandable	Please clarify	Solved. Clarify the 2 last paragraphs as follows: The authentication element shall be compatible with the material good or packaging of the material good. The impact of the authentication element on the manufacturing and distribution processes shall be evaluated. In the selection of authentication technologies the possibilities of bulk reading requirements and their potential conflicts have to be taken into consideration.
FR23	5.3.3.4		ed	Word is missing	Please add solution between authentication and specifier	Agreed.
JP0 6	5.3.3.4		te	It is unclear who is subject to the training. Is the training of manufacturer or authentication solution provider?	Clarify who is subject to the training.	Solved. Training for all involved parties shall be considered in all phases...
JP0 7	5.3.3.4		te	The text reads as 'Training will be required ...' This is an explanatory text. It should be stated as a	Modify the text as follows. Training should be in place ...	

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comment<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

				recommendation.		
FR24	5.4.1		ed	consistency	Please put bold "reverse engineering" and "simulation and emulation"	Agreed. And replace the title with: Reverse engineering and simulation and emulation
CH29	5.4.2	Title	ed	Wording	Harmonize the title with subclause 5.3.2.2.	Agreed.
CH30	5.4.3	Title	ed	Wording	Harmonize the title with subclause 5.3.2.3.	Agreed. Replace with alteration.
CH28	5.4 5.4.1 (2x) 5.4.4 & 5.4.5	Title, 1st sent. & Note.	ed	“authentication tool” is not defined in Clause 3. (Or is it “technical tools”?)	Add definition.	Solved with the definition of authentication tool.
FR25	5.4.6		Ed	typo	Replace databases with database	Agreed.
JP08	5.4.7		te	The title is as follows. Database communication security This would not be normal terminology.	Change the title as follows. Database access security or Database security	Solved. New title: Security of database access
CH31	5.5	1st sent.	ed	Wording	It should be written “ ...related <b>to</b> the...”.	Agreed.
CN4	5.5	Paragrahp1		Spelling mistake	Replace “related o” With “related to”	
FR26	5.5		ed		o → to	
FR27	5.5.1		te	Resources required to run the authentication solution shall be described	Please create a new sub-clause at the beginning of 5.5.1 : "Resources"	Agreed. 5.5.1. Required resources The authentication solution may require various resources for its operation. Among those to be considered are provisions of: - power, - communications, - facilities.

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comment<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

CH3 2	5.5.1.1	Bullets	te	The environmental conditions need a better classification. Currently there is no logic structure and they seem to be incomplete.	Add more specific partition: 5.5.1.1.1 Temperature: Hot, Moderate, Cold 5.5.1.1.2 Humidity: Dry, Moisture, Wet 5.5.1.1.3 Dirt: Clean, Dusty, Muddy 5.5.1.1.4 Irradiation: Short-wave (e.g. UV), Medium-wave (e.g. visible light), Long-wave (e.g. IR) 5.5.1.1.5 Magnetic fields	Solved. Add as introductive sentence: The environmental conditions have to be considered for example:  And add air pressure.
CH3 3	5.5.1.4	1st sent.	ed	Wording	Delete one point at the end of the first sentence.	Agreed.
CH3 4	5.5.1.4.1	1 <sup>st</sup> sent.	te	Ergonomics shall describe the conditions of handling the device and not ensure its function. This is already described in 5.5.1.	Delete “Under what lighting... performance.”	Solved. A determination of the lighting conditions under which the authentication element and tool are expected to function shall be made. Lighting conditions should not inhibit the reading of the authentication elements or the reading of the result if the control is done with the usage of a tool.
CH3 5	5.5.1.4.2	1 <sup>st</sup> sent.	te	Ergonomics shall describe the conditions of handling the device and not ensure its function. Functionality is already guaranteed by the conditions in 5.5.1.	Delete “Under what lighting... performance.”	Solved in the same way.
CH3 6	5.5.1.4.3	1 <sup>st</sup> sent.	te	Ergonomics shall describe the conditions of handling the device and not ensure its function. Functionality is already guaranteed by the conditions in 5.5.1.	Delete “Under what lighting... performance.”	Solved in the same way.
CH3 7	5.5.1.4.4	1 <sup>st</sup> sent.	te	Ergonomics shall describe the conditions of handling the device and not ensure its function. Functionality is already guaranteed by the conditions in 5.5.1.	Delete “Under what lighting... performance.” Add: “Wind, irrespective of its strength, shall not prevent the application of the authentication solution, the usage of a respective tool and/or the analysis of the investigation results.”	Solved. Wind should not inhibit the application of the authentication solution, the usage of a respective tool and/or the analysis of the investigation results.

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comment <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

DE 25	5.5.3.1.2		ge	<p>The topic supply chain security is too short and too general for one of the most important topics related to anti counterfeit activities as any security leak can compromise the complete solution.</p>	<p>The security of the supply processes of the components and data critical to the performance of the authentication solution shall be stated. This may concern in detail:</p> <p>manufacturing of authentication elements or tools, in particular</p> <ul style="list-style-type: none"> <li>control and balancing of the produced volumes</li> <li>access control to manufacturing site, restricted raw materials, and storage areas</li> <li>control of manufacturing secrets and secret recipes</li> <li>waste and defective production disposal</li> </ul> <p>confectioning of security elements in accountable units or volumes</p> <p>confectioning of security elements in serialized units or volumes</p> <p>restrictions on the possibility to procure authentication elements and tools or their critical raw materials and components</p> <p>traceability of deliveries of individualized elements or tools, in particular</p> <ul style="list-style-type: none"> <li>way of delivery, evtl. after notification</li> <li>handover to personally known recipients</li> <li>4-eyes-principle or written acknowledgment of receipt</li> </ul> <p>repairing, replacement or destruction of tools, in particular</p> <ul style="list-style-type: none"> <li>logging / tracing of individual serialized tools</li> <li>4-eyes-principle or written</li> </ul>	<p>Solved.</p> <p>Delete the sub clauses.</p> <p>5.5.3.1 Security policy</p> <p>The overall security policy for the authentication solution shall be clearly established. This concerns all the components of the solution involved, the links between them and the processes.</p> <p>It also includes the security of the supply chain and involved information technologies.</p> <p>The security policy shall be in accordance with relevant international or national standards and resolutions, or recognised industry practices.</p> <p>5.5.3.2.2 2nd sentence becomes:</p> <p>The audits should be performed according to relevant international or national standards, or recognised industry practices, by approved auditors or other authorities.</p>
-------	-----------	--	----	--	---	--

Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

					acknowledgment of receipt or destruction measures to maintain the privacy, integrity and authenticity of critical data delivered with security elements and tools	
FR28	5.5.3.3		te	The authentication solution should be able to accept upgradable capability without major changes.	Please create a new sub-clause "Upgrade capability" just after "Process adaptability" and re- title 5.5.3.3.4 as "Multiuse capability"  The authentication solution should be upgradable without major changes.	Agreed. Upgrade capability:  The authentication solution should be upgradable without compromising the effectiveness of authentication solution.
DE 26	5.5.3.3.3		ge	The chapter about traceability should logically be part of the supply chain chapter.	see DE 025	Solved. New title: Accountability and quality control Procedures shall be implemented to verify the production of authentication elements in terms of quality and quantity of authentication elements and tools according to the solution specifications.
FR29	6	Whole section	ed	Typo	Please replace "assesment" with "assessment"	Agreed
FR30	6	1 <sup>st</sup> §, line 4	ed	Typo	Based <b>on</b>	Agreed
FR31	6	§ on "by the evaluation of the implementation process"	ed	Typo	Based upon <del>the</del> all of the characteristics	Agreed
CH3 8	6.	Title	ed	Typo "assesment"	Correct is "assessment"	Agreed
CH3 9	6.	1st para., 3rd sent.	ed	A preposition is missing in this sentence	It should be written " ....based <b>on</b> the...".	Agreed
CH4 0	6.	point 1	ed	Very complicated to understand	Improve and simplify.	Solved. In this condition a material good is being



Template for comments and secretariat observations	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
--	-----------------	---

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

						counterfeited and the amount of counterfeiting may be known or unknown to the material good supplier. If the level of counterfeiting is known, then an effectiveness assessment can be established based upon a reduction in the amount of known counterfeits, provided the reduction in the amount of counterfeit can be effectively traced to the authentication solution. If the level of counterfeiting is unknown, then an estimate of this amount needs to be established by research and/or statistical analysis. Based upon that analysis, estimation can be made of the effectiveness of the solution.
CH4 1	6.1	1st para., 1st sent.	ed	Is the term "... authentication solution ..." or "... authentication element ..." as in title ?	To be checked.	Noted. Authentication element is correct.
US1 6	6.3	Effectiveness assessment		<b>3. The material good is not yet on the market</b> Prior to the introduction of a material good to the market a risk analysis should be performed to determine <b>the probability</b> of counterfeiting, and if there are financial, legal, social, health, safety or regulatory issues that require the implementation of an authentication solution.	Change probability to "likelihood" in all sections of the document.	Agreed.
CH4 2	6.4	2nd para.,2nd sent..	ed	A preposition is missing in the end of this sentence.	Replace "... as complex any..." by "...as complex as any ...".	Agreed.
DE 27	6.4	Title	Ed	Mistake	Change to: "assessments"	Agreed.
JP0 9	7		ed	ISO 31000 is now an International Standard. 'FDIS' should be deleted. 'Risk Management' should be 'Risk management'.	ISO 31000, Risk management — Principles and guidelines	Agreed.
JP1	7		ed	Bibliography should list correct titles.	ISO/IEC 15408-1, Information technology —	Agreed.

<b>Template for comments and secretariat observations</b>	Date:2010-10-27	Document: ISO CD 12931, JISC and BSI comments
---	-----------------	---

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comm ent<sup>2</sup></b>	Comment (justification for change) by the MB	Proposed change by the MB	<b>Secretariat observations</b> on each comment submitted

0				ISO 15408 Common Criteria ( IT Systems) ISO /IEC 27002 on Information Technology Security ( IT Systems)	Security techniques — Evaluation criteria for IT security — Part 1: Introduction and general model ISO/IEC 27002, Information technology — Security techniques — Code of practice for information security management Other titles need be corrected.	
CN5	7	[2]	Ed	Spelling mistake	Replace “TRIP’S” With “TRIPS”	Agreed.
US12	7 Bibliography	Add	Te	Add: NASPO/DSA Whitepaper: How to select a security feature.		Agreed.  And add for WHO document:  - WHO Technical report series, No. 957, 2010  - IMPACT document: Anti-counterfeit Technologies for the Protection of Medicines  And cancel reference to EC documents.
CH4 3	Annex A	Grids	ge	Verify the wording. Some terms are not in accordance with clauses and sub clauses. Ex: Harsh environmental <b>aggression</b> (≠ to 5.3.1.3)	To be checked.	Agreed.
FR32	Annex A		Ed	Typo	Inegrity → integrity	Agreed.
FR33	Annex B		Ed		Please replace right owners with right holder	Agreed.