



ISO/PC 246 N **048**

2010-07-22

ISO/PC Secretariat

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ISO/PC 246

Anti-counterfeiting tools

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Title	Results of the CD ballot on ISO 12931 "Performance criteria for authentication solutions for anti-counterfeiting in the field of material goods"
Source	ISO/PC 246 Secretariat
Status	For consideration at the next ISO/PC 246 meeting

Association reconnue

d'utilité publique

Comité membre français

du CEN et de l'ISO

Siret 775 724 818 00015

Code NAF 751 E

Result of voting

Ballot Information

Ballot reference	ISO/CD 12931
Ballot type	CD
Ballot title	Performance criteria for authentication tools for anti-counterfeiting in the field of material goods
Opening date	2010-04-16
Closing date	2010-07-16
Note	

Member responses:

Votes cast (14)	Austria (ASI) Canada (SCC) China (SAC) Finland (SFS) France (AFNOR) Germany (DIN) Italy (UNI) Kenya (KEBS) Korea, Republic of (KATS) Netherlands (NEN) Spain (AENOR) Switzerland (SNV) United Kingdom (BSI) USA (ANSI)
Comments submitted (0)	
Votes not cast (3)	Egypt (EOS) Nigeria (SON) Romania (ASRO)

Questions:

Q.1	"Do you agree to the circulation of the draft as a DIS?"
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Votes by members	Q.1
Austria (ASI)	We abstain
Canada (SCC)	Yes with comments
China (SAC)	Yes with comments
Finland (SFS)	We abstain
France (AFNOR)	Yes with comments

Germany (DIN)	Yes with comments
Italy (UNI)	Yes
Kenya (KEBS)	Yes with comments
Korea, Republic of (KATS)	Yes
Netherlands (NEN)	We abstain
Spain (AENOR)	We abstain
Switzerland (SNV)	Yes with comments
United Kingdom (BSI)	Yes
USA (ANSI)	Yes with comments

Answers to Q.1: "Do you agree to the circulation of the draft as a DIS?"		
3 x	Yes	Italy (UNI) Korea, Republic of (KATS) United Kingdom (BSI)
7 x	Yes with comments	Canada (SCC) China (SAC) France (AFNOR) Germany (DIN) Kenya (KEBS) Switzerland (SNV) USA (ANSI)
0 x	No	
4 x	We abstain	Austria (ASI) Finland (SFS) Netherlands (NEN) Spain (AENOR)

Comments from Voters		
Member:	Comment:	Date:
Canada (SCC)	Comment File	2010-07-16 15:29:56
CommentFiles/ISO_CD_12931_SCC.doc		
China (SAC)	Comment File	2010-07-16 03:19:03
CommentFiles/ISO_CD_12931_SAC.docx		
France (AFNOR)	Comment File	2010-07-12 12:55:25
CommentFiles/ISO_CD_12931_AFNOR.doc		
Germany (DIN)	Comment File	2010-07-16 15:30:49
CommentFiles/ISO_CD_12931_DIN.doc		

Kenya (KEBS)	<i>Comment File</i>	2010-07-16 08:46:09
CommentFiles/ISO_CD_12931_KEBS.rtf		
Switzerland (SNV)	<i>Comment File</i>	2010-07-07 13:34:31
CommentFiles/ISO_CD_12931_SNV.doc		
USA (ANSI)	<i>Comment File</i>	2010-07-16 16:56:12
CommentFiles/ISO_CD_12931_ANSI.doc		

Comments from Commenters		
Member:	Comment:	Date:

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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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 comm ent ²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

CH2	Foreword		ge	"The present document is part of a wider framework 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"	
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	
CH4	Foreword	Last sentence	ge	What are "simple and complex authentication solutions" ?	Replace "simple and complex" by "various"	
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.	
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"	
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.	
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> .	
CH1	General		ed	The verb “must” is still used in many places.	Verify if allowed by ISO (Refer to Directives).	
KE7	General principles	Clause 4.4.4, second paragraph	Ed		<i>Covert technologies exploit all kinds of physical, electrical or chemical effects</i>	
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.	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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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	
CA3	Intro	4.1 Intro Bullet 3		An y required information system	Any required information system	
CH5	Introduction		ed	" Counterfeiting is " should not be exclusive for this section	Replace by "Counterfeiting leads to, for example :"	
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.	
DE 4	Introduction			Introduction is not consistent.	Delete "Recognition of authenticity" and subsequent note.	
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".	
FR2	Introduction	§ on counterfeiting	te	Definition is limited	Please add "of material goods": A deceit on the purchasers of material goods , new or replacement parts	
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"	
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 possibly	
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>	
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	...particularly because of <i>trust in a brand</i>	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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				chain or in particular brands		
KE4	Introduction	last paragraph	Ge	Communicate intention	<i>This standard is not intended to constrain the organization's choice of authentication technologies</i>	
US2	Introduction	Para 5	Ed	Counterfeiting needs to be kept separate from the question of distribution of authentic material goods via alternative business channels.	Counterfeiting needs to be kept separate from the question of distribution <i>the diversion</i> of authentic material goods via alternative business channels. We want to add the definition of 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, is easier and often may uses non-traditional channels.	
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...."	
DE 6	Recognition of authenticity	Para 6-9	Te	The wording sounds like a "Scope"-wording.	Move paragraphs to Scope, remove shall-statements.	
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.	
CH7	Scope	Last sentence		"Some specific sectors" is too vague	Change to "Some industries and services"...	
FR4	Whole document		ed	Typo: Introduction, 5.3.1.5	Replace recognizing with recognising	
CN1	2		Ed	Spelling mistake	Replace "ISO/CEI" With "ISO/IEC"	
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.	
US15	3	definition		add "likelihood" from iso 31000 <jws-add... vs probability>>	Add the definition of "likelihood" ISO 31000. ISO 31000 2.1	
CH8	3		ed	Definition of Counterfeiting is missing	Add definitions referring to official international	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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					organizations (WHO GDP 2010 Annex 5, TRS 957, WCO, Interpol, etc..)	
CH9	3		ed	To do distinction between counterfeiting (IPR) and counterfeiting-crime (safety and public health)	Add definition of "Counterfeiting-crime"	
DE 10	3		te		Make 3.4 subpara to 3.3 (3.3.2) Make 3.5 subpara to 3.3 (3.3.3)	
DE 9	3		Te	def. of "authentication tool" is missing	Include definition, use text of 3.37, remove 3.37 Build subparagraph to 3.3 (3.3.1)	
FR5	3	Definitions	te	Simple tool	Simple tool: Stand alone tool without any intelligence	
FR6	3.1		ed	typo	Replace attempts with attempts	
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>	
DE 11	3.8		Te	The synonym fake goods is not used in the text. Can be deleted.	Delete "fake goods"	
US13	3.8	Definition		3.8 counterfeit goods/fake goods material good imitating or copying an authentic material good covered by the protection of one or more intellectual property rights . <<jws-focus on IPR not fraud??>>	Does not take into consideration trade secrets. 3.8 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 intellectual property rights .	
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	3.9 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>	
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	3.12 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> .	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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KE6	Definition	Clause 3.13	Ed		<i>Authenticity as evaluated by the inspector</i>	
US14	3.17	Definition		3.17 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. WIPO definition: Intellectual property (IP) refers to creations of the mind: inventions, literary and artistic works, and symbols, names, images, and designs used in commerce.	
CH10	3.17	Title	ed	Should be written in small letters.	Replace “Intellectual...” by “intellectual...”	
CH11	3.27	Title	ed	Should be written in small letters.	Replace “Purpose...” by “purpose...”	
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"	
CH12	3.37	Title	ed	“authentication tool” is also used (See 5.4), but this definition is missing in Clause 3.	Add definition.	
CH13	3.38		ed	Improve the definition	Modify to "A tracking system which enables traceability of lots during the distribution"	
CH14	(3.39)		ed	"Secure track and trace" or "Secure trail" is missing	Add definition	
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.	
US7	4 General principles	4 General principles 4.1 Introduction. 8 th Para third bullet	Ed	in which locations are we experimenting counterfeiting and how are the counterfeits being distributed?	in which locations are we experimenting experiencing counterfeiting and how are the counterfeits being distributed?	
CH15	4.1	3rd line	ed	Rights owner is not a usual legal term	Rights holder	
CH16	4.1	1st list,	ed	Typo	Correct is “any”.	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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		3rd line				
CH17	4.1	Second par.	ed	Typo	Correct is “ including ”.	
CH18	4.1	Last section	te	No added value and risk of ambiguity	Delete from "The level of performance..." to "(process and authentication)"	
CN2	4.1	Paragraph2	Ed	Spelling mistake	Replace “includind” With “including”	
DE 13	4.1	3 rd indent	Ed	Mistake	Change to: "any"	
FR7	4.1	3 rd bullet	ed	An y	Should be "any"	
US17	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”	
CH19	4.2	Inspection	ed	Overt – Semi-covert – Covert – Forensic	And/or should be added	
FR10	4.2	diagram	te	External data is not clear		
FR8	4.2	1 st §	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	
FR9	4.2	diagram	te	It was previously stated to use the term of material good	Product is to be replaced with material good	
CH20	4.4	Table 1	ed	"Field available tool" and "Laboratory equipment" : Definitions are missing	Add definitions in Clause 3.	
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.	Remove 1 st column and call the table “Inspection methods and categories of authentication solutions”; re-edit table <div> <div>Human senses only</div> <div> <div></div> <div>Field equipment</div> <div>Labor equipment</div> </div> <div>Technical tool</div> </div>	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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					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				
FR11	4.4	Restricted audience	ed	The title of restricted audience may need a plural					
FR12	4.4	Table 1	ed	One of the input of the table 1 is "inspection method".	Please place in the correct column.				
CH21	4.4.1	2 nd para.	te	Mode of operation is incomplete: Standalone, Online	Add counterparts: Mobile (like hand-held unit) and Offline				
FR13	4.4.1		ed	For question of editing, the sub-clause 4.4.1 should appear at the end of section 4.					
FR14	4.4.2		Te	reader is not appropriate	Please replace with "tool"				
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 with simple additional tool or equipment or by physically moving the object.				
CH22	4.4.4	Last line	ed	...elements may need some training	Remove word "may"				
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."				
FR16	4.4.4		te	Datamatrix may be recognisable and does not give any information	Replace recognizable by interpretable				
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 nd sentence to: The authentication elements may not be commonly known and/or easy accessible.				
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				

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					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 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"	
US8	4.4.5 Forensic category	Second paragraph	Ed	To be acceptable by a legal authority, forensic evidence may need to be proved by accredited / notified third Party. laboratory .	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. “	
FR17	5.1	1 st §	ed	Consistency of vocabulary	Please replace class with category	
US18	5.1	Performanc e Criteria/ introduction		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.	Change probability to “likelihood”	
CH23	5.2	2nd para.,2nd sent.	te	“semi-covert...” is missing in brackets.	Add “ semi-covert... ”.	
CH24	5.2	3rd para., 2nd sent.	ed	“two” is wrong. (There are three sections)	Replace “two...” by “ three... ”.	
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 methodology 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	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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					authentication solution.	
CH25	5.3	Title	ed	Should be written in small letters.	Replace “Authentication Elements” by “authentication elements”	
DE 20	5.3		te	Characteristic criteria should be added.	5.x not uncontrolled reuseable	
FR19	5.3.1		ed		Please replace ; with ,.	
FR20	5.3.1		ed		Please add that between "usage" and "must" And Replace must with shall.	
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 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.	
US9	5.3.1.3 Durability characteristics	Fourth bullet	Ed	- Aging that might result in a malfunction of the authentication element over life cycle.	- Aging that might may result in a malfunction of the authentication element over life cycle.	
CH26	5.3.1.5	2 nd line	ed	- Machine readable	Replace “readable” by readability”	
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>	
DE 21	5.3.2.1	title	te	extend title	"Copy resistance and reverse engineering"	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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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"	
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."	
CH27	5.3.2.3	Title	ed	In the previous version, the term "Hacking resistance" was used.	Verify which term fits better: "Hacking" or "Compromise".	
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.	
CN3	5.3.3.1	Paragraph1		Spelling mistake	Replace "implemeted" With "implemented"	
FR21	5.3.3.1		Ed	Typo	Replace implemented with implemented	
FR22	5.3.3.2.2		te	Last sentence is not understandable	Please clarify	
FR23	5.3.3.4		ed	Word is missing	Please add solution between authentication and specifier	
FR24	5.4.1		ed	consistency	Plese put bold "reverse engineering" and "simulation and emulation"	
CH29	5.4.2	Title	ed	Wording	Harmonize the title with subclause 5.3.2.2.	
CH30	5.4.3	Title	ed	Wording	Harmonize the title with subclause 5.3.2.3.	
CH28	5.4 5.4.1 (2x)	Title, 1st sent. &	ed	"authentication tool" is not defined in Clause 3. (Or is it "technical tools"?)	Add definition.	

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	5.4.4 & 5.4.5	Note.				
FR25	5.4.6		Ed	typo	Replace databases with database	
CH31	5.5	1st sent.	ed	Wording	It should be written “related to the...”.	
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"	
CH32	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	
CH33	5.5.1.4	1st sent.	ed	Wording	Delete one point at the end of the first sentence.	
CH34	5.5.1.4.1	1 st 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.”	
CH35	5.5.1.4.2	1 st 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.”	
CH36	5.5.1.4.3	1 st 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.”	
CH37	5.5.1.4.4	1 st 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	

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 comm ent ²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

					respective tool and/or the analysis of the investigation results.”	
DE 25	5.5.3.1.2		ge	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>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"> • control and balancing of the produced volumes • access control to manufacturing site, restricted raw materials, and storage areas • control of manufacturing secrets and secret recipes • waste and defective production disposal <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"> • way of delivery, evtl. after notification • handover to personally known recipients • 4-eyes-principle or written acknowledgment of receipt <p>repairing, replacement or destruction of tools, in particular</p> <ul style="list-style-type: none"> • logging / tracing of individual serialized tools • 4-eyes-principle or written acknowledgment of receipt or destruction 	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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					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.	
DE 26	5.5.3.3.3		ge	The chapter about traceability should logically be part of the supply chain chapter.	see DE 025	
FR29	6	Whole section	ed	Typo	Please replace "assesment" with "assessment"	
FR30	6	1 st §, line 4	ed	Typo	Based on	
FR31	6	§ on "by the evaluation of the implementation process"	ed	Typo	Based upon the all of the characteristics	
CH38	6.	Title	ed	Typo "assesment"	Correct is "assessment"	
CH39	6.	1st para., 3rd sent.	ed	A preposition is missing in this sentence	It should be written "based on the...".	
CH40	6.	point 1	ed	Very complicated to understand	Improve and simplify.	
CH41	6.1	1st para., 1st sent.	ed	Is the term "... authentication solution ..." or "... authentication element ..." as in title ?	To be checked.	
US16	6.3	Effectiveness assessment		3. The material good is not yet on the market Prior to the introduction of a material good to the market a risk analysis should be performed to determine the probability 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.	

Template for comments and secretariat observations	Date:2010-07-22	Document: ISO_CD_12931Comments
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1	2	(3)	4	5	(6)	(7)
MB¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted

CH42	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 ...".	
DE 27	6.4	Title	Ed	Mistake	Change to: "assessments"	
CN5	7	[2]	Ed	Spelling mistake	Replace "TRIP'S" With "TRIPS"	
US12	7 Bibliography	Add	Te	Add: NASPO/DSA Whitepaper: How to select a security feature.		
CH43	Annex A	Grids	ge	Verify the wording. Some terms are not in accordance with clauses and sub clauses. Ex: Harsh environmental aggression (≠ to 5.3.1.3)	To be checked.	
FR32	Annex A		Ed	Typo	Inegrity → integrity	
FR33	Annex B		Ed		Please replace right owners with right holder	