



April 14, 2023

Editorial Review Board  
National Institute of Standards and Technology (NIST)  
U.S. Department of Commerce  
700 Stratton Office Building  
Springfield, IL 62706  
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RE: [NIST Special Publication 800-63-4 ipd. Digital Identity Guidelines issued December 2022](#)

## **Introduction**

DocuSign welcomes the opportunity to respond to the request for comment on the draft fourth revision to the four-volume suite of Special Publication 800-63, *Digital Identity Guidelines* (SP 800-63). DocuSign is committed to helping citizens, governments, and businesses transition from manual, slow, expensive, and error-prone paper-based processes to digital ones, which can accelerate economic growth and simplify life for all. While DocuSign is best known for creating the world's leading e-signature solution, DocuSign has extensive experience with digital transformation solutions, including identity verification. Further, DocuSign eSignature and CLM are authorized at the FedRAMP Moderate Impact Level, and both have been granted a provisional Department of Defense (DoD) Impact Level 4 (IL4) authorization.

Today, DocuSign issues European Union (EU)-compliant digital certificates and is compatible with over 150 digital identity services used in the United States and around the world. In fact, DocuSign is a trust service provider ("TSP") under EU Regulation 910/2014 for electronic identification and trust services ("eIDAS"). As a TSP accredited in the EU, DocuSign provides qualified electronic signatures ("QES"), qualified time stamps, advanced electronic signatures ("AES"), and advanced seals recognized by all EU member states. DocuSign France is listed as a qualified TSP in the Trusted List managed by the European Commission, the Executive Branch of the EU. DocuSign also offers DocuSign Identify throughout the world, helping organizations validate the identity of their customers and fulfill compliance requirements, such as Know Your Customer/Anti-Money Laundering ("KYC/AML"), to reduce fraud and mitigate risk.

DocuSign appreciates NIST's engagement with the public and efforts to seek comment on SP 800-63, particularly as such standards are now applied in contexts beyond the government – references to SP 800-63 have been adopted in state and local government regulations, as well as other non-government scenarios for which companies must comply. In particular, DocuSign's comments focus on requirements related to automated verification technologies and the evidence required in such scenarios. We believe it is critical to maintain an option that allows for a fully digital

process with the appropriate safeguards – i.e., appropriate level of evidence. Please find attached to this email the [Comment Template](#) for: NIST SP 800-63-4 Suite (Initial Public Draft) with specific recommendations and comments.

### **Conclusion**

DocuSign appreciates the opportunity to provide comments and seek clarification in the sections noted in our attachment related to fair evidence, digital security features, KBA/KBV technologies, and trusted referees. We welcome the opportunity to continue this conversation with the NIST Editorial Review Board, and to share our experience and expertise in support of this important process to revise SP 800-63.

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If you have any questions regarding our comments, please do not hesitate to contact us.

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