

Comment Template for: NIST SP 800-63-4 Suite (Initial Public Draft)

Please submit responses to dig-comments@nist.gov by March 24 April 14, 2023

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Comment #	Publication (Base, 63A, 63B, 63C)	Section	Page #	Line #	Comment (Include rationale for comment)	Suggested Change
	63A	4.3.3.3	12	594	The proposed superior evidence includes a requirement that the evidence include digital information that is cryptographically signed. I believe that there are limited examples of evidence that meets this requirement available to individuals in real world situations. The evidence that comes to mind that meets this standard would be a Federal government PIV or CAC card and possibly a biometric passport. TTB has a requirement to proof individuals who will represent companies that we regulate and tax. If these individuals typically do not have superior evidence, they will frequently be required to proof via both a strong and a fair document, which represents additional burden to use multiple documents for this basic level of proofing. TTB also is responsible for administering tax benefits for imported alcohol from foreign producers. Identity proofing and requiring foreign producers to provide similar evidence will impose significant challenges.	