



IBIA TWIC ANPRM Hearing Testimony

Hello. My name is Megan Gajewski, and I am delivering these comments on behalf of Tovah LaDier, the Managing Director of the International Biometric Industry Association. IBIA is a non-profit trade association based in Washington, DC. We represent the collective interests of manufacturers, developers, integrators, consultants, and implementers of biometric technology and products. Several of our member companies provide the biometric matching software, sensor components, and integrated reader devices that will be used for the TWIC program. IBIA has reviewed the Advance Notice of Public Rule Making for TWIC Reader Requirements and will be submitting comments to the docket.

We appreciate the opportunity to speak at this public hearing and would like to make the following three points - each of which I will elaborate on:

1. TWIC reader products are commercially available and ready to perform,
2. Biometric identity verification should be required for all unescorted access transactions for those facilities and vessels that fall into Risk Category B, and
3. Maritime operators should be permitted to implement TWIC readers on a voluntary basis during the interim period prior to enforcement of a final reader rule.

As background, IBIA and its member companies have been involved with the TWIC program for many years. We are committed to its success and to providing the necessary products and subject matter expertise to ensure program success.

For the last three years, IBIA has worked closely with the maritime industry, TSA, and the U.S. Coast Guard in helping to define an effective TWIC reader program. IBIA volunteered to help lead the development of the TWIC Reader Hardware and Card Application specification through a collaborative effort with the National Maritime Security Advisory Committee (NMSAC) TWIC Working Group. IBIA's joint effort with the NMSAC TWIC Working Group resulted in a technical document that was delivered to the TSA in February, 2007, and was subsequently enhanced and published by TSA as a working specification.

In addition, IBIA has supported the SAFE Port Act and the Department of Homeland Security in conducting field tests of TWIC biometric readers at selected port and vessel operations to measure the impact on operations and assess the effectiveness of the technology when used in the challenging maritime environment. We are glad to hear that these tests are now operational in at least one port location.

I. TWIC reader products are commercially available and ready to perform.

This technical specification developed by the NMSAC TWIC Working Group addresses the special operational requirements of the maritime industry while taking advantage of existing Federal standards and available commercial off-the-shelf reader products that have been certified for use by the General Services Administration for the federal government's Personal Identity Verification (or PIV) program for all federal workers and contractors. For the most part, these existing reader products have been adapted to meet the unique TWIC specification requirements through relatively minor software modifications.

Contrary to recent misleading press accounts, TWIC readers are, and have been, available and ready for use by the maritime industry for some time. TSA has already successfully completed laboratory testing of 17 different reader models as meeting the basic functional requirements of reading TWIC cards. More extensive functional and environmental testing of these readers is now underway by TSA, and readers complying with TSA specifications will meet the stringent environmental and performance needs of maritime facility and vessel operators.

II. Biometric identity verification should be required for all unescorted access transactions for those facilities and vessels that fall into Risk Category B.

IBIA agrees with the Coast Guard that a risk-based approach to reader requirements for TWIC is appropriate. However, we disagree with the recommendation that biometric identity verification for risk group B be "randomly performed at least one day a month during MARSEC Level 1" threat conditions. Since the investment in biometric reader technology will have already been made by operators in this risk group and the additional time required for biometric identity verification is just a couple of seconds, we recommend requiring biometric identity verification through use of TWIC readers for all entry transactions.

There are many benefits to using TWIC readers for controlling worker unescorted access into secure and restricted areas of MTSA-regulated facilities and vessels, including:

- They can take full advantage of the sophisticated security technology in the TWIC smart card to automate card “validation” and the worker identity “verification” process.
- They replace dependence on less reliable manual visual inspection techniques and improve the accuracy and efficiency of the entire entry process.
- They protect against forgeries by validating that the card was actually issued by a TSA Trusted Agent and that the data stored on the card’s memory chip has not been altered or replaced.
- They check the expiration date on the card and whether or not the card has been revoked by TSA.
- They verify that the person presenting the card is the same person to whom the card was issued, eliminating the practice of “ghost” workers who borrow an ID badge from another worker.
- They directly interface with existing access control systems to determine which access privileges have been assigned to an individual and to control gate operation. TWIC readers collect and send to access control systems detailed transaction information for use in audit logs and for required record keeping.

All of the above functions can be performed in a few seconds.

Using TWIC as a “flash pass” for 29 out of 30 days for Risk Category B is inconsistent with the intent of Congress calling for the issuance of a “biometric transportation security card” in the Maritime Transportation Security Act. Language in the Act further states: “Biometric identification procedures for individuals having access to secure areas in port facilities are important.”

We also believe that implementing a random biometric identity verification process at fixed reader entry points will present some operational and technical challenges, including confusion and potential delays if the card holder does not have a consistent user experience when interacting with an unattended fixed reader device. Biometric technology is most effective when users are acclimated and have frequent and repetitive use. Proper finger placement, or presentation of any biometric sample for that matter, is relatively simple but requires user familiarity and understanding of presentation techniques. We are concerned that non-habituated users will introduce unnecessary errors in biometric sample collection through improper presentation. This could result in exception handling procedures which could delay the normal flow of operations. Lastly, invoking and managing a random process by which biometric identity verification takes place will add complexity to the software of both the reader and access control system.

4

III. Maritime operators should be permitted to implement TWIC readers on a voluntary basis during the interim period prior to enforcement of a final reader rule.

IBIA understands that the rule making process leading to a final rule for TWIC reader requirements will take a year or more. In the meantime, there are over one million TWIC cards in existence that will primarily be used in the form of a “flash pass” to gain access. This represents a vulnerability to high-risk facilities and vessels since visual inspection may not be sufficient to deter counterfeiting or loaning of TWIC cards.

During this interim period, we believe that operators should be allowed to strengthen their present security capabilities through the voluntary use of TWIC readers. We have met with the Coast Guard to discuss this matter and agree that the maritime industry could benefit from further guidance from the Coast Guard on voluntary use of TWIC readers in advance of final rule implementation. We stand ready to assist the Coast Guard in developing guidance policies and procedures that will ensure that readers are used properly and effectively and that operators understand the investment risk implications in the event that reader technical specifications change as a result of lessons learned during the field pilot program that is now underway.

IBIA members want the TWIC program to succeed and we stand ready to provide the necessary products and subject matter expertise to ensure program success. Thank you for your time today.