

SIA PIV WG Perspectives

On Establishing a New QPL for Credential Products “& Systems”

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What is the Scope/Objective?

- **Processes May Exist Now**
 - Underwriters Laboratories
 - UL 294 Standard for Access Control System Units
 - UL Addressing PoE, Encryption, Biometrics Now
 - UL 1076 Standard for Proprietary Burglar Alarm Units & Systems
 - UL 2050 – National Industrial Security Systems for the Protection of Classified Materials
 - Federal Government Requirement (NISPOM & DoD)
 - ANSI/SIA OSIPS – Open Systems Integration & Performance Standards
 - IEC TC 79 - Alarm & Electronic Security Sys.
- **How Will Requirements be Developed?**
 - The Above Take a Systems Perspective

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UL 294 Tests:

- Normal Operation Test
- Input Measurement Test
- Output Measurement Test
- Electrical Supervision Test
- Standby Power
- Undervoltage Operation Test
- Overvoltage Operation Test
- Variable Ambient Test
- Humidity Test
- Leakage Current Tests for Cord-Connected Products
- Electric Shock Current Test
- Overload Test
- Endurance Test
- Jarring Test
- Dielectric Voltage-Withstand Test
- Temperature Test
- Abnormal Operation Test
- Electrical Transient Tests
- AC Induction Test
- Polymeric Materials Test
- Battery Replacement Test
- Drop Test
- Strain Relief Test
- Tests for Ignition Through Bottom-Panel Openings
- Mechanical Strength Tests for Enclosures
- Special Terminal Assemblies Tests
- Attack Tests
- Tests for Alarm Sounding Devices
- Alarm Housing Test

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Cost Issues

- Initial Lab Fees
- Manufacturer Support Labor
- Redundant Test Equipment at Mfg
- Pre-Requisite Labs (e.g., FIPS 140-2)
- Redundant Labs (e.g., UL, NVLAP Labs)
- Cross Listing for OEMs
- Time to Market Delays
- Resubmissions on Changes
- System Test for Components

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Use Independent Labs

- **High Lab Costs Limit Product Offerings**
- **One Lab Can Test To Many Approvals**
- **Labs Compete for Client/Mfg**
 - Drive Prices to a Fair Market Value
- **TSA Qualifies Their Labs**
- **GSA APL is a Good Benchmark**
 - But, Note the Many Empty Categories
 - Especially High and Very High Assurance Solutions

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On TWIC

- **Pilots Based on Standalone Reader**
 - Narrow Goals of Pilot Will Not Flush Out All Systems Issues
- **Many Mfgs Holding R&D \$\$\$ for Final Rule**
 - Fear Specs Might Change (This is Not the 1st Pilot)
- **ICE Not a Comprehensive Set of Tests**
- **All Readers Are Proprietary**
 - Different SDKs
- **Specs Changes After the BAA (or Site Bids)**
 - Error Codes Between Reader and PACS (SPAWAR Demands)
 - Contact for Bio and CAK (Union Demands)
 - Operator Display Prompts and Feedback on “Why Failed”
 - PACS Registration Process (or Lack Thereof)

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Systems vs. Components

- **PIV & TWIC Developed Bottom Up**
 - PACS Excluded From Scope
 - So How Does the Reader Fit In?
 - No Way to Evaluate End-to-End Performance
- **PACS Evolved Top Down**
 - Intrusion Is Integral to PACS
 - Scalable, Distributed, Enterprise Architectures
 - PACS Mfgs Ensure Reader Compatibility
 - End-to-End Performance Tests Possible

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Recommendations

- **Please Keep It Streamlined**
 - Leverage Existing Industry Standards & Labs
 - Avoid New Process, Fee, or Delay to Market
 - Align with PIV-I, PIV-C, and ACIS initiatives
- **Allow 3rd Party NRTLs**
 - National Recognized Testing Labs
- **Take a Systems Perspective**

Thank You!

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