

Thank you for giving us the opportunity to comment on the recent Draft HSPD-12 Implementation Guidance. Input from the Department of Labor follows:

- o The Draft HSPD-12 Implementation Guidance addresses background investigations as a requirement of HSPD-12. However, it does not appear to take into consideration the increased workload, not only to the agencies, but also the investigation providers, most notably the Office of Personnel Management (OPM). The implementation guidance needs to address how those organizations conducting the background investigations (primarily the NAC and NACI) will be able to timely keep up with the expected influx so as not to create a bottleneck and delay in the initial issuing of the new cards. Specifically, we recommend the HSPD-12 Implementation Guidance include a requirement that OPM address how it will handle the foreseeable spike in background investigation requests. Perhaps as part of the solution OPM could assign a special code for HSPD-12 related background investigation, so that they receive special or priority handling.
- o Our understanding is that the materials alone for one copy of a smart card, with the required digital certificate, would cost in the range of \$50-\$60, per card. The normal budget planning cycle has not anticipated this requirement--a shortcoming that the guidance needs to address by arranging the necessary funding and/or lowering costs. For example, the expected security and/or interoperability benefit of requiring a digital certificate for every smart card could be re-examined
- o Consider the alternative of GSA being a government-wide sponsor (FED ID Handbook/5.1.5 Agency PIV) for agencies who could not, or chose not, to manufacture their own cards. Economies of scale and lower costs may be achieved.

Thank you again for the opportunity to comment.