

Public Comments Deadline: June 6, 2022

ASB Std 015, Standard for Examining Friction Ridge Impressions

#	Section	Updated Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	WG Resolutions
37	all		T	We realize that the forward states that "In addition to the requirements in this standard, best practice recommendations for the components of analysis, comparison, and evaluation will be provided in other ASB documents to provide guidance in meeting the requirements of this standard." But the requirements of this document need to be tied to the best practices in the field. When the standard says labs "shall have SOPs" what they should presumably also require is that lab's "shall have SOPs that incorporate OSAC standards, best practices and guidance as they are published." Not that each lab gets to make up their own SOPs.		Reject: This standard details the minimum requirements for conducting friction ridge examinations that must be included in a lab's standard operating procedures. How those requirements are met can be accomplished in different ways. To date, no Friction Ridge standards have been published by the ASB. Once other standards and best practice recommendations are published by the ASB, references to those documents can be added when this standard is revised.
41	Throughout		E	In TR016 and other documents, Utility is defined under/with Suitability	Either update requirements/recommendations in the body of the document to use "suitability/utility" OR Keep Utility in the Terms section but only as a reference to the definition under Suitability [Utility] (this will allow the readers to find Utility in the definitions)	Accept: Added "suitability" to "utility" definition and moved above "suitability decisions" making the definitions consistent with TR016. Changed all other uses of "utility" to "suitability."
44				The scope says the document is for ANY method but the document is very specific to one proposed method. Additionally, the reference to an OSAC proposed document directly conflicts with current ASB documents.		Accept: Removed definitions for Analysis, Comparison, and Evaluation. Removed references to Analysis, Comparison, and Evaluation in the Foreward and section 4. Terms such as "compare" and "comparison" are still in the standard when used as common language terminology. Removed reference to OSAC proposed standard.
23	1		T	The only limit on scope is that the document "does not address specific requirements for quality assurance/quality control of the examination methodology. However, the document also does not address requirements for other procedures and required documents (e.g., 4.3.2-4.3.4 ("shall have a written procedure") and 4.4.5 ("shall have a procedure")). Without an explicit disclaimer that this standard does not cover what those procedures should be, stakeholders may wrongly assume that any content is scientifically supportable.	Add limiting language making clear that this standard lists the procedures and protocols that a laboratory should have for [X] but does not fully specify the content that those procedures and protocols must have to be fit for that purpose.	Accept with modification: Added "This document does not address how each requirement should be achieved" to the Scope.
38	1		E	The FRCB has determined that the term "process" is preferred over "method" or "methodology"	Replace "methodology" with "process"	Accept: Replaced "methodology" with "process"
24	3.10	3.8	T	Defines a "high quality" impression as one that is "unambiguous" and "self-evident," but these terms need to be justified/defined. Unambiguous as to what - that it is a whorl on finger 4 in a particular position?	Add addition words to fill in the blank: "unambiguous and self-evidence as to ...."	Reject: Definition for 3.10 is consistent with TR016. Comment will be provided to TR016 Working Group.
39	3.1, 3.2, 3.5	Terms Removed	E	The FRCB has determined that the term "process" is preferred over "method" or "methodology"	Replace "method" with "process"	Accept: Replaced "method" with "process" through the document
2	3.7	3.5	t	major case prints are a common type of exemplar. The use of casted/moulded prints as an example but not a more commonly used method is weird. While the list is not intended to be all-inclusive the absense of a common example is weird	add major case prints to the note	Reject: Definition is consistent with TR016. Comment will be provided to TR016 Working Group.
3	3.12	3.11	t	the second sentence is not a definition and should not be included as a definition of observed data	for consistency make the second sentence a note	Reject with modification: Revised definition to be consistent with TR016. Comment will be provided to TR016 Working Group.
4	3.13	3.12	t	the statement following the semi-colon is not a definition and should not be included as a definition for questioned impression	for consistency make the second statement a note	Reject: Definition is consistent with TR016. Comment will be provided to TR016 Working Group.
1	3.15	3.13	t	the term "utility" is not needed and doesn't add anything to the document. It is redundant considering 3.14 (suitability decision) is a generally accepted term that means the same thing	remove utility as a definition and all uses of it within document	Accept with modification: Added "suitability" to "utility" definition and moved above "suitability decisions" making the definitions consistent with TR016. Changed all other uses of "utility" to "suitability."
40	3.15	3.13	E	Per TR016, "utility" is not defined alone, but instead is defined under "Suitability Utility" to be consistent with other definitions (like 3.14)	Update "Utility" to "Suitability Utility" per TR016 and re-alphabetize	Accept: Added "suitability" to "utility" definition and moved above "suitability decisions" making the definitions consistent with TR016.
11	4.1				Remove the reference to section 3.6 since it is anticipated that the definitions will be removed. If it is left in, the document will make no sense when definitions are removed.	Accept: Removed reference to section 3.6
25	4.1		T	This section notes that an examination will be done by a "competent" examiner but doesn't define what "competent" means (e.g. has passed X # of proficiency tests; done a certain type of training, etc.	Define further what "competent" examiner means, either here or in 3.6.	Accept with modification: Added TR016 definition for "competent friction ridge examiner" to this standard.
26	4.2.1	Removed	E	This repeats a definition already provided in Section 3	Delete, unless some further elaboration is required here.	Accept: Already removed based on comment 44.

27	4.2.2.(h)	4.2 h	T	discusses minutiae	Define minutiae	Accept: Added TR016 definition for "minutia" to this standard.
5	4.2.4	4.4	t	documenting the orientation of a latent impression is not needed or even applicable in a lot of situations	procedure for documenting the orientation should be a "should" statement and not a "shall" statement.	Reject: Orientation is an important part of the examination process and could lead to an error if not assessed correctly. As a result, documentation of orientation will remain a "shall."
28	4.2.5	4.5	T	Gives no further guidance on how to define the criteria for determining the utility of an impression.	Further define (list) the criteria that are sufficient and insufficient to render an impression useful for further analysis.	Reject: Section 4.2.2 already lists the criteria to be used during the examination process, while section 4.2.3 addresses the basis for the suitability decision.
42	4.2.5	4.5	E	The word "decide" here seems grammatically inappropriate as neither the "criteria" nor the "observed data" actually "decide" anything.	Recommend changing "decide" to "support"	Accept: Changed "decide" to "support"
43	4.2.6 NOTE 2	4.6 NOTE 2	E	Use of the term "claim" is not necessarily universally understood nor is it defined within the document.	Recommend rewording NOTE 2 to..."Unlabeled" means an impression that has not been marked or otherwise designated for further use.	Accept: Changed "named to "claim" it" to "otherwise designated"
29	4.2.6.	4.6	T	Labs should presumably have to explain why an impression is deemed not useful, rather than simply noting that an "unlabeled" impression is not useful.	Require that labs include an explanatory note on why impressions are NOT useful (as well as a note as to why those that ARE deemed useful are useful).	Reject: Already addressed in Sections 4.2.5 and 4.2.8, which require the FSP to define criteria for suitability and have a written procedure for documenting the information that supports the suitability decision.
30	4.2.7.	4.7	T	It's not sufficient to require labs to have a written policy on how to define what is a high quality impression or what is a complex impression.	Either include further guidance as to how to decide whether an impression is high quality or complex, or include a disclaimer that says: "This standard lists the procedures and protocols that a forensic science service provider should have for _____ but does not fully specify the content that those procedures and protocols must have. This standard does not substitute for standards that will more specifically set forth minimum requirements or best practices for the procedures and protocols mentioned here."	Accept with modification: Added "This document does not address how each requirement should be achieved" to the Scope.
6	4.2.8	4.8	t	for high quality latents with no ambiguity and a lot of features documenting minutia on the front end is unnecessary and a waste of time. It doesn't add anything to the case and for agencies that are dealing with large backlogs this will slow them down at no added benefit. no research has reliably shown that marking a high quality impression prior to exposure to the known reduces the risk of bias or adds transparency to a case	marking latents during the analysis should be limited to impressions with ambiguous features noting which areas have less weight/strength	Reject: Contemporaneous documentation of the data observed to support suitability and conclusion opinions is a best practice.
31	4.2.8(a)	4.8 a	T	The Note suggests that retaining auto-encoded features "may be" retained as documentation. Transparency re these features is essential to understanding and assessing the search processes and retaining documentation about these should be required.	Change "may be" to "must be" or "shall be".	Reject: Some AFIS systems do not allow for retention of this information.
32	4.2.8(b)	4.8 b	T	Documentation of support for the utility decision should make clear whether any required data (per 4.2.2) was excluded from analysis (e.g., because it was not present or was of insufficient quality). This clearly signals that the examiner knew to look at that data but, for an explicit reason, did not do so (as opposed to the fact that the examiner just overlooked that data).	Include requirement that the examiner should document any data (required per 4.2.2) that did not factor into the utility decision.	Reject: Documentation of the information used to support the suitability decision is required to ensure there is a sufficient basis to support the decision. Documentation of information that did not factor into a decision is unnecessary and impractical.
8	4.3.2	4.9	e	there's too many spaces between exemplar and friction	remove extra spacing between words	Accept: Removed extra spaces
7	4.3.3	4.1	e	there's too many spaces between exemplar and friction	remove extra spacing between words	Accept: Removed extra spaces
14	4.4	Removed		The scope says, '... requirements for each component of ANY examination methodology' yet section 4.4 is specific to an evaluation as defined by a specific method '... WHEN CONSIDERING THE TWO COMPETING PROPOSTIONS'	Change the name of this section so that it applies to ANY examination method as indicated in the scope. Perhaps 'Drafting Conclusions'.	Accept with modification: Section removed based on comment 44.
13	4.4.1	Removed		The scope says, '... requirements for each component of ANY examination methodology' yet section 4.4.1 is specific to '... WHEN CONSIDERING THE TWO COMPETING PROPOSITIONS'	Remove the reference to a specific method ('competing propositions') since the scope indicates this document is for ANY method.	Accept with modification: Section removed based on comment 44.
15	4.4.1	Removed		The evaluation stage refers to '...formulate a source conclusion' which is specific to one method.	change 'formulate a source conclusion' to 'drafting a conclusion' to stay in line with the stated scope.	Accept with modification: Section removed based on comment 44.
19	4.4.1	Removed		This sentence begins with the word Evaluation which is specific to one method. This does not fall in line with the scope that says this document is for ANY method.	Change 'evaluation' to 'Drafting a conclusion' to be in line with the stated scope.	Accept with modification: Section removed based on comment 44.
35	4.4.1	Removed	E	The phrase "the weighting of the aggregate strength of the evidence" is odd. The idea is that one looks at similarities and differences to judge the weight of the evidence in favor of a source conclusion. (It would be good to confine testimony to the weight of the evidence and not give opinions on which conclusion is true or false.)	Try "the assessment of the aggregate weight of the evidence".	Reject with modification: Section removed based on comment 44.
36	4.4.1	Removed	T	The phrase "in order to formulate a source conclusion" suggests that the end result of the evaluation of the features is a source attribution or an exclusion. The end result should be a statement of the weight of the evidence.	Delete "in order to formulate a source conclusion."	Reject with modification: Section removed based on comment 44.

16	4.4.2	4.12		4.4.2 refers to '... source conclusions' which is specific to one method.	change 'source conclusions' to 'conclusions' to stay in line with the stated scope.	Accept: Removed "source"
33	4.4.2	4.12	T	Why should labs be left to define what source conclusions are scientifically supported? Why not offer this guidance here?	Explain what the universe of legitimate (science-based) source conclusions is that an examiner could give.	Reject: Conclusions are being addressed in Standard 013. The intent is for labs to follow the requirements in Standard 013 but that document is not published yet. Once it is published, a reference to that standard can be added to this standard during the next revision (or sooner if Standard 013 is published before this one).
17	4.4.3	4.13		4.4.3 refers to '... source conclusion' which is specific to one method.	change 'source conclusion' to 'conclusion' to stay in line with the stated scope.	Accept: Removed "source"
34	4.4.3	4.13	T	Why should labs be left to define what the criteria for various source conclusions are?	Explain what the criteria should be for various source conclusions (e.g. "exclusion," "inconclusive," "strong support,")	Reject: Conclusions are being addressed in Standard 013. The intent is for labs to follow the requirements in Standard 013 but that document is not published yet. Once it is published, a reference to that standard can be added to this standard during the next revision (or sooner if Standard 013 is published before this one). Best Practice Recommendations for the ACE method are also being drafted, which will provide recommendations for how to meet the requirements within this standard. Those BPRs recommend criteria that can be used to reach a conclusion.
18	4.4.4	4.14		4.4.4 refers to '... source conclusion' which is specific to one method.	change 'a source conclusion' to 'conclusion' to stay in line with the stated scope.	Accept: Removed "source"
20	4.4.5	4.15		4.4.5 refers to '... source conclusions' which is specific to one method.	change 'source conclusions' to 'conclusions' to stay in line with the stated scope.	Accept: Removed "source"
22	4.4.5	4.15	T	This section addresses documentation of "data that support source conclusions." This language could facilitate confirmation bias (i.e., only looking for and documenting information that supports the conclusion) as opposed to more transparent documentation. Consider including language that also requires documentation of important data that might counter the source conclusion, and why the examiner gave it less weight	Consider rephrasing to "all relevant data and the rationale for the examiner's source conclusion."	Accept with modification: Changed 4.4.5 to "The FSP shall have a procedure for documenting the relevant observed data that was evaluated to reach a support source conclusions;" Changed 4.4.5.b. to "The observed data that was evaluated to reach <del>used to support</del> the conclusion."
21	4.4.5 d	4.15 d		4.4.5.d states 'Changes in the interpretation of the observed data in the questioned friction ridge impression after the initiation of the comparison process.' This is specific to the linear approach method and therefore is not in line with the given scope which indicates this document is for ANY method. <u>Changes are due to ambiguity, which should be documented.</u>	Remove 4.4.5.d. Or Change to d) criteria for documenting ambiguity of features.	Reject: Changes are not always due to ambiguity. Section 4.4.5.d. requires documentation to be conducted at the time of the observation but does not require a strictly linear approach in the examination.
9	annex		t	item 1 conflicts with ASB document. This document is also not referenced within the ASB document	remove reference and footer	Reject: Item 1, ANSI/NIST ITL 1-2015, is referenced in Section 4.2.2.
10	annex		t	referenced OSAC document seems to be supporting including a standard that has not been approved as an SDO but is still listed as a standard which is misleading. the OSAC document also conflicts with other ASB documents being reviewed in several areas (eg it still has 5 stand-alone conclusions which conflicts with the current draft of the conclusions document going through the ASB process.)	remove reference and footer	Accept: Already removed based on comment 44.
12	Bibliography 2)			I cannot link the reference in the document but by searching NIST, it appears this document conflicts with ASB document 013 as the conclusions in the NIST document refer to support for source ID and support for source exclusion. The ASB has not <u>accepted these terms.</u>	Remove reference (and footer) as it conflicts with ASB documents. It also is not referenced within the document so the relevance is unknown.	Accept: Already removed based on comment 44.