

Deadline of Submission of Comments:

30-Jan-23

Document Number:

ANSI/ASB Std 015

Document Title:

Standard for Examining Friction Ridge Impressions

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
11	General		Would still like to see mention of ACE/ACE-V since it is a generally accepted examination method.	Comment from CB Voting Member	Accept - ACE is generally accepted terminology to describe the steps of friction ridge impression comparisons. Definitions for Analysis, Comparison, and Evaluation reinserted. References to Analysis, Comparison, and Evaluation in the Foreword and section 4 reinserted. Updated terms to be consistent with TR 016.
12	General		Lacks content: no requirements for practitioners to follow.	Comment from CB Voting Member	Reject - The standard outlines minimum requirements and contains 25 "shall" statements and 2 "should" statements.
13	General		Document seems fine to me. Are we abandoning all mention of "ACE" or "ACE-V"? If so, why?	Comment from CB Voting Member	Accept - ACE is generally accepted terminology to describe the steps of friction ridge impression comparisons. Definitions for Analysis, Comparison, and Evaluation reinserted. References to Analysis, Comparison, and Evaluation in the Foreword and section 4 reinserted. Updated terms to be consistent with TR 016.
10	General	T	The recirculated document seems to suggest that analysis and documentation of analysis should occur before exposure to a known print, and that changes to any observations during comparisons to knowns should be documented. But as we read the standard, that isn't necessarily mandated, given how often the standard just states that "a lab must have a policy." That would be a major problem given, among other things, PCAST and AAFS statements that ACE-V should be linear, as well as Bradford Ulery et al.'s 2015 paper on changes to mark ups (titled Changes in latent fingerprint examiners' markup between Analysis and Comparison).		Reject - 4.2.8 b states "Documentation of the observed data in the unknown friction ridge impression shall take place prior to proceeding to the next step" and 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." Based on those two requirements, labs are required to document both the initial analysis and changes made after starting comparisons. How the labs choose to document that information may vary.
1	Foreword	E	The word "minimum" is needed in the first sentence, between "the" and "requirements"	Insert "minimum"	Accept - Added "minimum" as suggested
2	3	E	The use of examiner in the document refers to "competent friction ridge examiner." Since they are referring to the same thing, the definitions should be combine to create a single definition for examiner.	Merge the definitions of "examiner" and "competent friction ridge examiner."	Accept
3	3	E	All instances of "utility" has been replaced with "suitability".	Remove "utility" from definitions.	Reject - TR 016 has kept "utility" as a synonym of "suitability." Definitions updated to be consistent with TR 016.
6	3.1 and 3.2	T	As written, it is unclear what the distinction is between a competent friction ridge examiner (3.1) and an examiner (3.2). Is it the successful completion of the FSP's training program?	Clarify what the difference is between the two or combine into one category.	Accept. Definitions merged per Comment #2.
9	3.3	T	"Competent" may be misleading in the definitions list as training/experience may not necessarily lead to competency unless the FSP specifies how assess the knowledge/skills/abilities.	Change definition title to "trained examiner", or provide specific and detailed criteria for how competency is assessed	Reject - Outside the scope of this standard. Competency requirements will be addressed in STD 014 Training.
7	3.6 (CB believes this comment is for the term "observed data")	E	unclear as written : Any information seen within an impression that an examiner relies upon to reach a decision, conclusion, or opinion.	suggested rewrite: Any discernible detail within an impression that informs an examiner decision, conclusion, or opinion.	Reject - Definition is consistent with TR016. Comment will be provided to TR016 Working Group.
4	4.3	T	It should be a minimum requirement for suitability decisions to include suitability for not proceeding to a comparison. The language should be more general to include decisions to proceed and not proceed to comparison.	Change to or something similar to the following: "At a minimum, the suitability decisions shall include suitability for a comparison."	Reject - Addressed in section 4.2.3, which includes "At a minimum, the suitability decisions shall include suitability for proceeding to a comparison."
5	4.9	T	A written procedure for comparing questioned friction ridge impressions and exemplars should be a minimum requirement.	Add a sentence similar to the following: "The FSP shall have a written procedure for comparing questioned friction ridge impressions to exemplars."	Reject - This entire standard requires the FSP to have written procedures to address the minimum requirements for comparing questioned friction ridge impressions.

8	5.2	E	For the following sentence: 'Instructors and mentors shall have acquired the minimum competencies themselves.' - what competencies specifically?	List here or refer to other section where specific competencies are delineated.	Reject - There is no section 5.2 or mention of "instructors and mentors" in this standard.
Added by WG	General	E	Replace "database" with ABIS based on comment adjudications in STD 014.	Replace "database" with ABIS	Accept - Replaced "database" with "Automated Biometric System Identification" throughout standard to be consistent with STD 014.
Added by WG	General	E	Replace "unknown" with "questioned" to be consistent with TR 016.	Replace "unknown" with "questioned"	Accept - Replaced "unknown" with "questioned" to be consistent with TR 016.