Public Comments Deadline: March 14, 2022
ASB ASB Best Practice Recommendation 165, Best Practice Recommendation for Analysis of Friction Ridge Impressions

#	Section	New Section	Type of Co	Comments	Proposed Resolution	Final Resolution
23			T	I am concerned that there is no mention of specificity of features. It seems like this should be added to the complexity determination for example if the entirety of the impression is a pattern force area it should be considered more complex.	Add information about pattern force areas.	**REJECT -** While pattern force areas/specificity are important considerations, these are not necessarily directly related to complexity
35	Foreward		T	Many consider ACE-V to be a process, not a methodolody	Replace "methodology" with "process"	**ACCEPT**
68	Foreword		T	Analysis is the interpretation of observed datain a friction ridge impression in order to categorize its utility.	According to Davis Ashbaugh's (who I believe coined ACE-V) book (Page 109) anaysis is much more than an "of value" or utility determination. It is vital that the examiner memorialize the data in a questioned impression before the comparison phase to avoid using information in the known to interpret the unknown. I suggest adding info from Ashbaugh's book or the NIJ Fingerprint source book. As is, is misleading and not best practice	**REJECT -** Recommendation is too prescriptive for the Foreword. The best practice recommendations for Analysis are included in the main body of the document.
90	Overall		E	Documentation requirements are sprinkled and duplicated and reworded throughout the document.	Restructure the recommendations in the document to consolidate documentation requirements and remove needless/confusing redundancy	Accept with Modification: Various recommendations were reworded and the document was updated based on all comments received.
6	1		T	ACE-V is a process, not a methodology	change methodology to process	**ACCEPT**
15	1		T	I see these best practice documents being used in court to say that you didn't do enough even if you met the requirements of the corresponding standard. I recently attended the AAFS conference and viewed a presentation by Heidi Eldridge. She had a thoughtful comment that I believe should be added to the scope of each of the best practice documents. She explained that the best practice documents work with the standards and provide how a FSP could meet the standard but are not the only way that a FSP could meet the standard. They are a reccomendation from the OSAC and if the best practice document is followed, the standard will be met.	Add to the scope what a best practice document is so that it will not be interpreted as a standard in court.	**REJECT -** The expectations and requirements of Best Practice Recommendations versus Standards are published and available in ASB's *Manual and Style Guide for ASB Standards, Guidelines, Best Practice Recommendations, and Technical Reports*
36	1		T	Many consider ACE-V to be a process, not a methodolody	Replace "methodology" with "process" throughout	**ACCEPT**
53	1		T	Methodology is not a term we use when referring to ACE-V now	Refer to ACE-V as a process rather than methodology	**ACCEPT**
7	3.1		T	ACE-V is a process, not a methodology	change methodology to process	**ACCEPT**
16	3.1		E	Examination should not be capitalized	change Examination to examination	**ACCEPT**
37	3.1		T	Many consider ACE-V to be a process, not a methodolody	Replace "method" with "process"	**ACCEPT**
69	3.1		T		Same as above	*(See Comment 68)* **REJECT** - Recommendation is too prescriptive for a definition. The best practice recommendations for Analysis are included in the main body of the document.
55	3.1 (after 3.16)		E/T	Lists verification as 3.1 again, see above for method comment.	Should this be 3.17? Also, see above for proprosal to change to process	**ACCEPT -** Section renumbered as 3.17
20	3.1 (listed after 3.16)		E	3.1 listed after 3.16 should be 3.17	change 3.1 to 3.17	**ACCEPT**
54	3.1, 3.3, 3.5	3.1, 3.3, 3.6	T	Methodology is not a term we use when referring to ACE-V now	Refer to ACE-V as a process rather than methodology	**ACCEPT**

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77	3.2		T	The definition of blind verification does not account for FSP policies that bias the verification process (i.e., FSP policy that only identifications must be verified) and does not consider the bias that arises from the verifier knowing the identity of the original examiner. See, e.g., Mattijssen et al, Cognitive bias in the peer review of bullet and cartridge case comparison, Science and Justice 60 (2020) 337-346.	Include in the definition that to be truly blind verification, this phase requires FSPs to adopt measures to ensure the subsequent examiner has no knowledge of the other examiner's **identity,** and cannot infer decision or conclusions from the fact that verification is taking place.	**REJECT -** Recommendation is too prescriptive for a definition. Best practice recommendations for verifications (including blind verifications) are the subject of a separate document. Also comment was passed on to ASB TR 016 working group.
8	3.3		T	ACE-V is a process, not a methodology	change methodology to process	**ACCEPT**
17	3.3		E	Examination should not be capitalized	change Examination to examination	**ACCEPT**
38	3.3		T	Many consider ACE-V to be a process, not a methodolody	Replace "method" with "process"	**ACCEPT**
59	3.4		T	The definitions of 'complexity' do not really define complexity, rather they identify a need to address complexity	Consider providing a definition of complexity based on characteristics of the impression/comparison	**REJECT -** Best Pratice Recommendations relating to the designation of complexity levels are included within the document. This level of detail is not appropriate for general definitions appearing the Terms and Definitions section.
78	3.4		T	The phrase "may require additional consideration" is vague and does not reflect the important fact that difficulty increases with complexity and that this correspondingly increases the risk for error.	The recommendation for rating complexity and this rating triggering additional quality measures appear to come from the recognition that there is greater risk for error in more complex prints. To promote transparency on this point, and to more clearly set out the importance of the BPR, the definition should spell out this out. Replace " whose attributes may require additional consideration" with "whose attributes render impressions more difficult to analyze, increase the risk of error, and therefore require additional quality assurance measures."	**REJECT -** Recommendation is too prescriptive for a definition. Complexity is one of a number of factors in the decision of whether an impression will or will not be subject to additional consideration and quality assurance measures.
9	3.5	3.6	T	ACE-V is a process, not a methodology	change methodology to process	**ACCEPT**
18	3.5	3.6	E	Examination should not be capitalized	change Examination to examination	**ACCEPT**
39	3.5	3.6	T	Many consider ACE-V to be a process, not a methodolody	Replace "method" with "process"	**ACCEPT**
1	3.6	deleted	E	definition of examination was removed from TR016 due to being too generic or plain English version intended	delete examination definition	**ACCEPT**
79	3.6	deleted	T	The definition of examination includes "analyzing and interpretating" but there is a separate definition for interpreting.	Make clear that Examination is an umbrella term under which other terms like interpretation fall.	**REJECT WITH MODIFICATION** - The term examination was removed from the Terms and Definitions Section
40	3.7		E	There is an extra comma after "moulded prints,,"	Remove extra comma	**ACCEPT**
42	3.7		E	Section 3.7 states: “The deliberately recorded images or impressions from the friction ridge skin of an individual.” If exemplars are always derived from known individuals, then this could be stated explicitly. Also, the accompanying note has an extra comma.	Add “known” before “individuals”; remove extra comma from note	**REJECT** - ASB TR 016 originally had the reference to a known/established identity but that reference was removed. Comment will be passed on to ASB TR 016 Working Group.
80	3.7		E	There is an extra comma between "prints" and "or photographs"	remove additional comma	**ACCEPT**
91	3.7 NOTE		E	Extra "," needs to be removed from NOTE	Remove extra ","	**ACCEPT**
60	3.11		T	Should compound/combined minutiae also be defined here? (e.g. , hooks, lakes, etc.)	Consider adding a definition to cover situations where analysts use more specific labels for particular arrangements of ridge endings and bifurcations.	**REJECT** - Recommendations within the current document rely upon the uniform designation of minutiae in the determination of complexity level. The current definition is appropriate.
43	3.12		T	Section 3.12 begins: “Any information seen within an impression that an examiner relies upon to reach a decision, conclusion, or opinion.” This definition restricts “observed data” to that data on which the examiner relies, which seems too narrow	Revise to “of the type that an examiner could rely upon”	**REJECT**: No changes will be made to this document but this comment will be passed on to ASB TR 016 working group. Edits that TR 016 working group will make to this definition will be reflected within this document.
81	3.13		E	The two clauses are confusing- if a questioned impression is an impression "whose source is unknown" how can it include impressions from "a known source"?	Remove "or a known source" from final clause.	**REJECT** - ASB TR 016 included known source intentionally. Comment will be passed on to ASB TR 016 Working Group for further consideration.
2	3.14 and 3.15	3.15 and 3.16	E	not in alphabetical order	re-arrange 3.14 and 3.15 so alphabetical	**ACCEPT**

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25	3.16	3.14	E		Add "suitability" as a synonym. Makes it more consistent with 3.15.	**ACCEPT**
3	3.17		E	definition of verification (phase of examination methodology) not numbered correctly	currently numbered as 3.1, correct to be sequentially numbered (3.17)	**ACCEPT**
19	3.17		E	Examination should not be capitalized	change Examination to examination	**ACCEPT**
61	3.17		E	Currently, the numbering indicates that verification is clause 3.1, but it should be 3.17	Change verification clause number to 3.17	**ACCEPT**
62	3.17		T	Verification is not mentioned in the Foreword at all, and there is a note below 3.17 indicating that verification is a quality control measure. This is presumably the reason for it's absence in all places except the definitions section, but maybe that should be clearly stated in the foreword and/or scope.	Consider addressing the absence of verification procedures in this document in the foreword and/or scope.	**REJECT -** Verification is included in the Terms and Definitions section as it is cited in Section 4.6 of the current document. Best Practice Recommendations for verification are covered in a separate document.
92	3.17		T	1) Section needs to be corrected to 3.17, and 2) Definition needs to be updated to match current definition in BPR 144 and TR 016	Update definition and correct Section numbering	**ACCEPT**
44	4.1		E	Section 4.1 reads: “A questioned impression, which has been assessed as having observable data and potential Utility is selected.” The passive voice here leaves ambiguous who selects the impression.	Revise to specify who should select the impression	**ACCEPT**
63	4.1		E	Out of context, this is a weird sentence. Selected by who and for what purpose?	Consider adding information on who and why questioned fingerprint impressions are "selected"; writing in active as opposed to passive voice could help improve clarity	**ACCEPT WITH MODIFICATION** - Statement changed to active voice with "Examiner" selecting the impression. The purpose and reason for the selection are already clear within the document (i.e. for analysis and because it has been assessed as having potential utility)
45	4.2		E	Section 4.2 reads: “The observable data in the questioned friction ridge impression is analyzed and should be documented prior to comparison with an exemplar friction ridge impression.” The passive voice here leaves ambiguous who performs the analysis and documentation.	Revise to specify who should perform the analysis and documentation	**ACCEPT**
70	4.2			The observable data in the questioned friction ridge impression is analyzed and should be documented prior to comparison with an exemplar friction ridge impression.	How to document an impression shoudl be detailed/explicit here. See complet impressions in the Fingerprint Sourcebook	**REJECT WITH MODIFICATION:** This section was modified for clarity. One statement moved from section 4.3 to 4.2. Additional recommendations appear later in this document.
46	4.3		T	The last part of section 4.3 states: “At a minimum, minutiae should be included to support the examiner’s utility decision (i.e., ridge endings, bifurcations, and dots).” The definition of “minutia” in 3.11 does not include dots, but this implies dots are minutiae.	The two sections should be revised to be mutually consistent	**REJECT -** Section 3.11 specifically includes "dots" in the definition.
71	4.3		T	The features and related observable data that should be considered during the analysis.....At a minimum, minutiae should be included to support the examiner’s utility decision (i.e., ridge endings, bifurcations, and dots).	The features and related observable data that should be documented during the analysis...At a minimum, minutiae/ridges should be documented and traced to memorialize the data the examiner observes prior to comaprion with the known.	**REJECT** - Minimum recommendation for documentation is minutiae. Documentation of other observable data is not necessarily practicable. Current document does not preclude ridge tracing but does not consider it best practice for all impressions.
82	4.3		T	The first paragraph sets out a detailed list for the types of data that should be considered during analysis. The second paragraph then fails to require examiners to document all the factors the BPR recommend they analyze. This means that the examiner's process will not be available for external review.	Recommend that all factors under consideration-- classification pattern, ridge flow, minutiae, creases or wrinkles, scars, and the type, location, orientation, shape, texture and morphology of these individual attributes all be documented to support the examiner's utility decision.	**REJECT** - This Best Practice Recommendation recognizes that not all impressions require the same volume of documentation; some factors that are considered during Analysis do not lend themselves to documentation; and the examination process occurs within the cognitive processes of the Examiner and not within the case file.
56	4.3 and 4.4.1		T	Do not require all prints be documented digitally, regardless of quality. We must balance workload and efficiency, and it's time consuming and unnecessary to document excellent quality prints.	Remove 2nd paragraph in 4.3 regarding minutiae and don't state that they must be preserved digitally for every case. Make it based on quality (lower quality prints should be documented during analysis).	**REJECT** - Second sentence was moved to section 4.2. Digital annotation is considered the preferred method to meet the recommendation to color code minutiae confidence levels.
47	4.4		E	Section 4.4 reads: “The quality of the features and related observable data should be analyzed and documented.” The passive voice here leaves ambiguous who performs the analysis and documentation.	Specify who person should perform the analysis and documentation	**ACCEPT**

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10	4.4.1		T	does this comment mean digital preservation of minutia through software like PhotoShop? If so I feel this is unecessary for all latent prints. Minutia can be documented via text in our notes	just state the documentation should be preserved.	**REJECT** - Digital annotation is considered the preferred method to meet the recommendation to color code minutiae confidence levels
26	4.4.1		T	Why recommend how the documentation should be preserved? If it's preserved in a permanent format, shouldn't that be enough? This part is too prescriptive.	Delete first sentence.	**REJECT** - Digital annotation is considered the preferred method to meet the recommendation to color code minutiae confidence levels
72	4.4.1		T		annotation is important, need to describe what this is	**REJECT**: This section is clearly written.
21	4.4.2		T	"Documentation should conform to the NIST markupInstructions for Extended Friction Ridge Features, as provided by the criteria in 4.4.2.1 through 4.4.2.6." The NIST document is much more extensive and I am concerned that a section on maping the quality of the impression will be interpreted as needing to meet the criteria in the entire NIST document	Change "NIST markupInstructions for Extended Friction Ridge Features" to "NIST markupInstructions for Extended Friction Ridge Features Section 6.1"	**REJECT:** Relevant section of the NIST standard is included in Annex A.
33	4.4.2		T	Seems overly complicated. I don't understand putting black as the background. This would likely triple analysis time.	Limit colors. Include more suggestions for how this type of analysis could be done without specific colors and instead with documentation of observed features.	**REJECT:** The color coding is based on the NIST Standard which is cited within the document and included as Annex A. This document is a best practice recommendation not precluding agencies to use their own color coding. For example only utilizing red, yellow, and green.
48	4.4.2		E	The last part of the note reads: “For example, Category 3 (green) quality regions indicate areas within a friction ridge impression where the examiner has no doubt the presence of minutiae; whereas, Category 2 (yellow) quality regions indicate areas in which the presence of minutiae is debatable.” This appears to be missing some words and contains irregular punctuation.	Note should be modified to read “no doubt as to the presence of minutiae, whereas Category 2 …”	**ACCEPT**
49	4.4.2		T	The last part of the note reads: “For example, Category 3 (green) quality regions indicate areas within a friction ridge impression where the examiner has no doubt the presence of minutiae; whereas, Category 2 (yellow) quality regions indicate areas in which the presence of minutiae is debatable.” There seems to be a tension between calling an examiner having no doubt and something being debatable as two very different categories—someone can have no doubts about something that is still debatable.	The note might be clearer if it adopts the language of 4.4.2.1, i.e., “where all observed data are definitive.”	**REJECT**: The note is clear as written.
93	4.4.2		T	1) Current research has demonstrated that examiners are inconsistent in their assessments of quality within friction ridge impressions 2) Current research has demonstrated that examiner utility decisions are driven by the number of observed minutiae and that other considerations such as quality do not play a statistically significant role in that decision 3) Current research has demonstrated the lack of permanence/persistence of level 3 detail and thus severely limits its utility in friction ridge examination	Given the limitations discussed in the comments, I recommend limiting the scope of the quality documentation to levels relevant to friction ridge examinations (i.e., green, yellow, and red)	**REJECT:** The color coding is based on the NIST Standard which is cited within the document and included as Annex A. This document is a best practice recommendation not precluding agencies to use their own color coding. For example only utilizing red, yellow, and green.
24	4.4.2.1		T	This section discusses quality decisions as unambigious and seems to express the idea that all analysts would mark the same features/areas with the same quality color.	Discuss that some difference (=/-1 quality/color level) is expected among similiarly trained/competent/proficient analysts. Diffrences of more than 1 level may require additional monitoring/review.	**REJECT** - While differences in quality assignments between examiners can be expected, the scope of this document is an individual examiner's analysis. The resolution of disagreements between examiners is the subject of a separate document. Monitoring examiner performance (formerly Section 4.9) was removed from this document.
83	4.4.2.2		T	While the other categories specify the type of data considered, Category 5 is general and vague.	Revise to read: "Category 5 quality: all pores, ridge edges, minutiae, and ridge flow are definitive."	**REJECT** - Recommendation matches verbiage from NIST which is cited within the document and included as Annex A
76	4.4.2.4		T	How is debatable minutiae being define here? Questioning whether a minutiae exists or whether the minutiae is an ending ridge, bifurcation, and/or where it connects?	Offer guidance on what debatable pores, depatable ridge edes, debatable minutiae, and debatable ridge flow actually means.	**REJECT**: Annex A provides additional guidance.

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41	4.5		T	Why are we now putting arbitrary numbers to complexity opinions? What's the basis for these? Are we inviting more opportunities for citicism? I also understand this is a best practice, but I can imagine a number of agencies treating this like a standard.	Unsure. More ambiguous terms? All minutiae designated as Cateogory 3 or higher (looking at 4.5.1, specifically). Majority of minutiae designated as…(looking at 4.5.2). Etc.	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.
11	4.51		T	we should not be counting minutia - there is no scientific basis for a minimum number	remove the numbers	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.
84	4.5.1		T	The note following the recommendation for non-complex impression designation allows for less vigorous documentation of the data supporting the decision. This runs counter to the stated goals of the BPR.	Remove the Note following subection (b).	**REJECT** - The Best Practice Recommendation requires the assessment of complexity for the purpose of recommending appropriate levels of documentation as well as appropriate levels of quality assurance measures.
94	4.5.1 a)		T	Given the unreliability of level 3 detail, there does not seem to be a valid justification for reducing the number of minutiae (which is technically a green level assessment) for features in a blue or higher quality designation	Recommend removing the second half of the recommendation for blue or higher quality	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.
74	4.5.1.a and note		E/T	The numbers in the note and what is used in section 4.5.1.a do not agree. Section a. says great than 15 (so 16 or more minutiae - greater than does not include 15), but the note says documenting 15.	Either change a. to 15 or more (or 16 or more depending on what the expectation is) or change the note to 16.	Accept
57	4.5.1, 4.5.2, 4.5.3		T	There's no basis to list a number of minutiae, as we take into account more than just number of points.	In each of these sections, remove "a" that discusses a number of minutiae	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.
75	4.5.1, 4.5.2, 4.5.3		E/T	The number ranges seem to conflict, or not agree between the different sections. Greater than 15 (16 or more), at least 12 (12 or more), between 8 and 15 (9 to 14), between 5 and 12 (6 to 11), fewer than 8 (7 or less), fewer than 5 (4 or less). So either there is overlap at 15, 12, 8, and 5, or those numbers are missing from the ranges. If I have 8 category 3 minutiae - is it low or high complexity?	Adjust ranges to be more clear on the actual numbers that are needed.	Accept
12	4.5.2		T	we should not be counting minutia - there is no scientific basis for a minimum number	remove the numbers	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.
95	4.5.2 a)		T	Given the unreliability of level 3 detail, there does not seem to be a valid justification for reducing the number of minutiae (which is technically a green level assessment) for features in a blue or higher quality designation	Recommend removing the second half of the recommendation for blue or higher quality	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.
64	4.5.2 and 4.5.3		E	These two clauses might be more clear in table form.	Consider creating a table to explain the criteria for low and high complexity.	Reject: Criteria are clear as stated.
65	4.5.2 and 4.5.3		T	Should there be a "moderate complexity impression" or some other change to the category labels?	The language "low" and "high" suggests to a listener/reader not familiar the conditions used to determine the categories that these categories are further apart than they actually are (based on these conditions, an impression could be low complexity with 8 minutia, and high complexity with 7 (category 3 quality minutia, assuming 8 in included in the low complexity category).	**REJECT** - The categories "High" and "Low" do not necessitate the existence of a "Moderate" category particularly when the categorizations cover the range of possibilities.
66	4.5.2 and 4.5.3		T	Does high or low complexity include the mid-point? (8 minutia at category 3, 5 minutia at category 4)?	Specify in one of the clauses which includes the midpoint.	**REJECT** - The criteria for "High" and "Low" complexity are defined within the document. No "midpoint" is or need be defined for assessing the complexity level.
4	4.5.2(b)		T	Don't believe this makes sense to be in the "low complexity" section.	Correct section to read "the observed data provides a weak indication of the anatomical region or orientation"	ACCEPT
13	4.5.3		T	we should not be counting minutia - there is no scientific basis for a minimum number	remove the numbers	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.

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89	4.5.3		T	I don't think minutia count should be the sole determination of what makes an impression high complexity. Is the intent that it also includes 4.5.2 b), no strong indication of region/orientation?	Include additional criteria for high complexity: low minutia count, or a slightly higher minutia count combined with uncertain location/orientation and/or additional "red flags" like extreme pressure, slippage, overlap, etc.	ACCEPT
96	4.5.3 a)		T	Given the unreliability of level 3 detail, there does not seem to be a valid justification for reducing the number of minutiae (which is techncially a green level assessment) for features in a blue or higher quality designation	Recommend removing the second half of the recommendation for blue or higher quality	**REJECT:** The minutia counts are being offered as a practical guide to assessing the complexity of an impression and not as a threshold for sufficiency.
5	4.6		E	instead of quality control use quality assurance	correct text to read "quality assurance measures"	**ACCEPT**
85	4.6		T	The use of the disjunctive "or" makes this recommendation too permissive and fails to hold FSPs to sufficiently rigorous standards given the increased danger of error for highly complex impressions.	Change from "or" to "and".	**REJECT** - This statement lists quality assurance options for the FSP to employ with high complexity impressions and is purposefully written with the flexibility to employ one or more options as is appropriate to the impression/circumstances.
97	4.6		T	(consultation is recommended)	Add a definition for consultation to the Terms and Definitions	**ACCEPT**
22	4.7		T	I like this statement - "The utility of an impression is an operational decision, not a scientific one.." The issue is that it seems to conflict with Best Practice Reccomendation 142 which states when there is a conflict between examiners over a suitability decision the case should be reassigned if the original examiner does not agree. Please work on fixing BPR 142 to remove utility decisions from conflict - it is an operational decision that should be checked in technical review and mediated by the tech lead or the supervisor if needed.	No changes needed for 4.7 but you should consider the conflct with BPR 142.	**REJECT -** No recommendation proposed for current document.
58	4.7		T	The minimum criteria for suitability is difficult to define and all aspects (quality, quantity, location) should be taken into account.	Remove Note 1	**Reject:** Note modified to become section 4.7.1 as a recommendation as it is up to the FSP to define it.
88	4.7 Note 1	4.7.1	T	I am unsure what this note is trying to say. Since different source conclusions have different criteria, how can there be a single suitability for comparison criteria? The wording "more stringent than" sounds like this is trying to eliminate latent prints of value for exclusion only.	Define more clearly or give examples - I can't give any more specific recommendations because the intent is unclear.	**Reject:** Note modified to become section 4.7.1 as a recommendation as it is up to the FSP to define it.
73	4.7 Note 2	4.7.1 note	T	Because the note recognizes that the literature doesn't support numerical thresholds based SOLELY on minutiae counts, perhaps the note to explicitly discourage this practice	"...the FSP may decide to implement a minutiae threshold as one component of the utility decision"	**REJECT** - The current note does not state that such a numerical threshold would be the only consideration for the utlility decision.
86	4.7 Note 2	4.7.1 note	T	By allowing an FSP to implement a numerical threshold based on minutae quantity despite scientific support, the BPR permits misleading fact-finders about the significance of the numerical threshold.	Add the following to the Note: ". . . The FSP may decide to implement a threshold to help define the utility decision but shall note the lack of scientific data when reporting this threshold in the examiner's case file or formal report."	**REJECT** - The current note does not state that such a numerical threshold would be the only consideration for the utlility decision.
50	4.7.1	4.7.2	E	Section 4.7.1 states in part: “The utility designation for each friction ridge impression should be documented to indicate which friction ridge impressions will proceed to further examination steps.” This language implies at least one friction ridge impression will proceed to further examination steps	Revise to read: “which friction ridge impression(s), if any, will proceed…”	**ACCEPT**
87	4.7.1	4.7.2	T	(a) As written, this subsection fails to promote transparency and thorough documentation and risks the FSP failing to comply with their constitutional obligation under Brady to disclose exculpatory information; (b) By permitting the examiner to document just a portion of the factors under consideration when reaching their conclusion, the last sentence of this subsection undermines the goal of this recommendation.	(a) Amend the language as follows: "Some information such as the utility decision, search identifier, and complexity designation **must** be documented in the case file to comply with legal requirements" and (b) amend the language as follows: remove the last sentence beginning with, "At a minimum...."	**REJECT** - Too prescriptive. This recommendation could be more appropriate for a standard document and not a BPR document. Also defining the legal obligations is outside the scope of this document.

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67	4.7.1 (b) and in 4.8	4.7.2 - b	T	Documentation of the features of the fingerprint used is great, but it would be extra great is there were explanations provided linking the fingerprint features with their decision (for both value/no value OR comparisons). For instance, "there were very few observable minutia, but they were all category 4 quality. In particular, the minutia patterns seen in the [location on print] is particularly distinctive and will be useful for analyses."	Consider adding "...should be documented and linked to the final determination made by the examiner." or something similar. In addition, adding this to the list in 4.8 might be helpful too.	**REJECT** - The link between observed data and decisions for utility is implied by the documentation of the observed data.
14	4.7.1 a	4.7.2-a	T	documentation does not need to be done digitally	remove this portion	**REJECT** - Digital annotation is considered the preferred method to meet the recommendation to color code minutiae confidence levels
28	4.7.1 a)	4.7.2-a	T	Same as 4.4.1. This is too prescriptive.	Delete "digial image"	**REJECT** - Digital annotation is considered the preferred method to meet the recommendation to color code minutiae confidence levels
51	4.7.1(b)	4.7.2-b	T	Section 4.7.1(b) reads: “If an impression is determined to have utility, the observed data supporting the utility decision should be documented including the presence, location, and quality of features. At a minimum, the observed data supporting the examiner’s utility decision should be documented.” The second sentence provides a “minimum” standard that is identical to the more general standard in the first sentence	This appears to be a drafting error; I’m unsure what the intended meaning was	Accept. First sentence was modified and the second sentence was removed.
27	4.9	deleted		Again, too prescriptive. The FSP should decide how to routinely monitor the performance of an examiner. Prescribing this for each and every technical review or verification is an undue burden on the FSP.	Delete, or make it clear this is an example but not the only way to routinely monitor the performance of an examiner.	**ACCEPT**
52	4.9	deleted	E	Section 4.9 reads: “Routine monitoring of examiners’ performance should be completed as part of verification or technical review of the case file.” The use of passive voice leaves ambiguous who should monitor the examiners’ performance	Revise to specify which person should be monitoring performance	**REJECT WITH MODIFICATION -** Section was deleted
98	4.9	deleted	T	Recommendations are not part of the application of Anlaysis and are outside of the scope of this document. By the requirements own statement, monitoring is done in Verification and Technical Review (which are separate documents).	Delete Section 4.9 as they are all quality assurance matters and not part of the Examination Process.	**ACCEPT**
30	Annex A		E	In Annex A, in the yellow box to the left of "is any information present", there appear to be missing spaces between the words.	Insert necessary spaces between words.	**ACCEPT**
31	Annex A and 4.4.2.1		T	The words "certain" and "definitive" are used in Annex A and 4.4.2.1 of this document. Can those words be definied in the definitions section of this document?	**Certain**: Pertaining to the decision making process. Oxford Languages defines certain as known for sure; established beyond doubt. For example: The examiner is "certain" of the ridge flow. **Definitive** Pertaining to the ridge flow. Defined per Oxford Languages as done or reached decisively and with authority. For example: The ridge flow is “definitive.”	**REJECT -** As your recommendation clarifies, these terms are being used in their generally accepted meaning. No further clarification of their usage in this document is required.
32	Annex A and Definitions		T	"ROI" is used in Annex A, where the work flow chart is located. ROI is never mentioned in the document or is that abreviation used. Can the ackronmyn be defined in the definitions section of this document.	**Region of Interest (RoI)**: Per IGI Global, Region of Interest or RoI is defined as a selected subset of samples within a dataset identified for a particular purpose. EX: The Region of Interest of RoI would be considered the target areas or minutiae utilized to come to a value determination.	**ACCEPT WITH MODIFICATION** - The abbreviation ROI is now defined parenthetically in the Annex statement where it appears
29	Annex A figure 1		E	There are a number of words that need spaces between them in the boxes on the left hand side.	Review these statements in the boxes on the left hand side and add spaces where needed.	**ACCEPT**