	A	D	E	F	G	H	I	J
5	**Comment #**	**Text Line # (s)**	**Document Section**	**Type of Comment E-Editorial T-Technical**	**Current Document Wording**	**Proposed Revision**	**Revision Justification**	**Final Resolution**
6	1		Title	E	Terminology for a Suspected Pattern of Dental Origin	The title should read "Terminology for a Pattern of Suspected Dental Origin."	A mark on the skin is not a "suspected" mark, it *IS* a mark (which may or may not be a pattern - doesn't matter). A mark or marks believed to have been made by teeth (or other objects) MAY form a pattern. But it is still a pattern or marks - nothing suspect about having a pattern or marks. It is there. **What is suspect is if the marks or patterns is of dental origin or something else.** This is not symantics, it is an important disctinction.	**Decline** You are correct that marks are not "suspected" but rather present. However, according to term 3.1.3, our initial step is to determine if these marks constitute a pattern. Only after confirming the presence of a pattern do we proceed to ascertain whether it is of dental origin or attributable to another source. This procedural sequence—first identifying the pattern and then determining its origin—is precisely reflected in the title, which appropriately mirrors the analytical process involved.
7	2	--	Forward	E	It is important to note that these definitions do not assert a scientific foundation for the terms.	This document should not go forward in ASB as there is no established scientific foundation for this practice.	It is stated in the Forward that the definitions do not assert a scientific foundation for the terms, but publishing a standard in ASB for terminology related to bitemarks/suspected patterns of dental origin DOES imply a scientific basis for the practice. ASB's stated purpose on their website is to provide "accessible, high quality SCIENCE-BASED consensus forensic standards." If this is not based in science, then it should not be an ASB standard. Also, a definition of evidentiary value includes the phrase "empirically significant scientific determination." The implication from this is that this document does assert a scientific foundation for these terms. This then does not "provide clear and unambiguous descriptions for effective communication" because the Forward says one thing while definitions say another.	**Accepted With Modification** The ASB FO CB acknowledges your concerns and reaffirms the ASB's commitment to science-based documents. This report aims to establish consistent bitemark terminology to improve communication, as noted in the disclaimer. It addresses NIST-identified issues, such as research gaps and examiner disagreements, while encouraging further study. Clear terminology is essential for consensus and challenging unsupported areas and allowing even critis to clearly deliniate unsupported areas of concern. However, to address concerns a Preface has been added and the scope disclaimer strengthen to explicitly clarify what was already stated in the docuemtn since its inception at OSAC
8	3	30	3 Terms and Definitions	E	**3.1.3.2 patterned impression** surface alteration demonstrating the capacity to replicate the characteristics of the object causing the alteration	**3.1.3.2 patterned impression** surface alteration that may replicate the characteristics of the object causing the alteration	3.1.3.1 uses the "may reproduce" terminology so may replicate seems more appropriate	**Decline** The term is intended to convey that the surface alteration has the demonstrated ability to replicate the characteristics of the object, providing a clear and definitive description of their relationship. However, as clarified in the scope, simply defining the term does not imply that there is a scientific basis for its reliable application. Therefore, using the term as written ensures that if there is a lack of scientific validity, it will be unequivocally clear.
9	4	30-33	3.1.3.2	E	Definition of patterned impression: surface alteration demonstrating the capacity to replicate the characteristics of the object causing the alteration	Remove definition as this does not apply to "patterns of dental origin"	While this is a generic definition meant to apply to all pattern impressions, there is a lack of scientific evidence demonstrating that bitemarks accurately replicate the characteristics of the biting dentition. The term "patterned impressions" is used in other disciplines and the use of it in this document impliesa validity to bitemark analysis/suspected pattern of dental origin analysis that is not supported by scientific evidence. Therefore, this definition would NOT apply to bitemarks or "suspected patterns of dental origin."	**Accepted With Modification** The scope clearly states that defining a term does not imply scientific validity. Many previously accepted scientific terms and concepts have been disproven as part of the evolution of scientific thought, but they are still discussed using well defined terminology. The inclusion of terms like ""patterned impressions"" and ""suspected patterns of dental origin"" in this document serves to clarify the subject, not to validate the underlying practice. Defining these terms is essential to ensure that concerns, such as those raised in the NIST report, are clearly addressed without implying that they are scientifically supported. Clear definitions help focus the discussion on areas where evidence is lacking, rather than suggesting unwarranted credibility. However, to address concerns a Preface has been added and the scope disclaimer strengthen to explicitly clarify this issue
10	5	34	3 Terms and Definitions	E	**3.1.4 bitemark/bite mrk** physical alteration in a substrate caused by the contact of the biting surface of a tooth or teeth as a result of a closure of the mouth	**3.1.4 bitemark/bite mark** physical alteration in a substrate caused by the contact of the biting surface of a tooth or teeth	The teeth rarely close completely (closure)during human on human biting. An exception is avulsibe bites. Also, the mark is made by the contact with teeth and does not have to be the result of closure of the mouth. Marks can be made with contact of only one arch	**Accepted With Modification** This modification was implemented to differentiate it from a toothmark, which occurs when a tooth makes contact, and to better reflect the commentator's intent. 3.1.4 bitemark/bite mark physical alteration in a substrate caused by the contact of the biting surface of opposing teeth

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11	6	43-45	3.1.6	E	Definition of evidentiary value: information of sufficient usefulness to serve as the basis for making an empirically significant scientific determination	Remove definition as this does not apply to "patterns of dental origin"	This does not apply to bitemarks or "suspected patterns of dental origin" as there is no "empirically significant scientific" basis to the practice. Therefore, based on this definition, this information cannot be of evidentiary value. There is also no definition of what constitutes "sufficient usefulness" or "significant scientific determination" so the definition is too vague to be used in practice.	**Accepted With Modification** The scope clearly states that defining a term does not imply scientific validity. Many previously accepted scientific terms and concepts have been disproven as part of the evolution of scientific thought, but they are still discussed using well defined terminology. The inclusion of terms like ""patterned impressions"" and ""suspected patterns of dental origin"" in this document serves to clarify the subject, not to validate the underlying practice. Defining these terms is essential to ensure that concerns, such as those raised in the NIST report, are clearly addressed without implying that they are scientifically supported. Clear definitions help focus the discussion on areas where evidence is lacking, rather than suggesting unwarranted credibility. However, to address concerns a Preface has been added and the scope disclaimer strengthen to explicitly clarify this issue
12	7	46	3 Terms and Definitions	E	**3.1.7 Artifact** spurious observationanomaly not intrinsically present feature not related to thesource	**3.1.7 Artifact** spurious observation; feature may not be related to the purported source	Punctuation and acceptance of possibility of uncertainty	**Accepted**
13	8	50-51	3.1.8	E	Definition of suspected pattern of dental origin analysis: forensic examination, analysis, and determination of the pattern for potential links to dental origin	Remove definition as it does not accurately reflect the abilities of examiners and the actual conclusions that can be drawn.	This defintion states that "determination" is a step in the analysis process. Dental origin or even "potential links" to origin cannot be determined as there is no scientific evidence to support that claim. "Determination" connotes a strength of conclusion that is not supported in bitemark analysis/suspected pattern of dental origin analysis.	**Accepted With Modification** The scope clearly states that defining a term does not imply scientific validity. Many previously accepted scientific terms and concepts have been disproven as part of the evolution of scientific thought, but they are still discussed using well defined terminology. The inclusion of terms like ""patterned impressions"" and ""suspected patterns of dental origin"" in this document serves to clarify the subject, not to validate the underlying practice. Defining these terms is essential to ensure that concerns, such as those raised in the NIST report, are clearly addressed without implying that they are scientifically supported. Clear definitions help focus the discussion on areas where evidence is lacking, rather than suggesting unwarranted credibility. However, to address concerns a Preface has been added and the scope disclaimer strengthen to explicitly clarify this issue
14	9	52	3 Terms and Definitions	E	**3.1.8.1 bitemark assessment analysis** forensic examination that a pattern is a bitemark based on the class characteristics of a dentition	**3.1.8.1 bitemark assessment analysis** forensic examination investigating whether a pattern is a bitemark based on the class characteristics of a dentitions	possibility of uncertainty	**Decline** As stated in the dislcaimer of the scope this document does not provide criteria for using these terms or suggest that they have a scientific basis for reliable application. ISO rules clearly state that terminolgy documents cannot not prescriptive. SInce all anaylsis have a possibility of uncertanity this inclusio would be part of the reporting standard not
15	10	57	3 Terms and Definitions	E	**3.1.8.1.1 bitemark analysis** forensic examination of class and individual characteristics of a bitemark	**3.1.8.1.1 bitemark analysis** forensic examination of class and individual characteristics of a bitemark, including metric analysis	size matters	**Decline** Metric analysis is redundant as it falls under class characteristics.
16	11	82	3 Terms and Definitions	E	**3.2.1.1. cusp mark** Pattern left by the most protruding portion of the tooth	**3.2.1.1. cusp mark** Pattern or patterns left by cusps, the varibly protruding portion of the tooth Note to entry: a tooth may have 1,2,3,4,5, or more cusps	[patterns may be left by multiple cusps, not just the most protruding cusp	**Accepted With Modification** Pattern left by the most protruding portion(s) of the tooth
17	12	82	3	E	3.2.1.1	either delete or move to number 3.3.1	it relates to an individual charactheristic	**Decline** The term "3.2.1.1. cusp mark" typically describes the pattern of cusp marks across an arch, not as an individual characteristic of a single tooth, which is why it is classified as a class characteristic.
18	13	117-118	3	E	dental midline-line drawn between the central incisors of a dental arch	dental midline-line drawn between the central incisors each dental arch (maxillary and mandibular) and to each other	max/mand midline relative to face and each other	**Accepted**
19	14	140	3	E	3.3.3.1	3.3.4	independent of 'metric' 3.3.3	**Decline** is seems to be the appropriate place for this term as a child of metric.
20	15	147	3.4.1	E	147 **3.4.1 biological substrate** tissue upon which the pattern was impressed inanimate object upon which the pattern was impressed 159 3.4.2 non-biological substrate	If the definition for non-biologic substrate includes "inanimate object" then the definition for "biological substrate" should include "object that is living or has lived" or similar wording		**Decline** The term tissue is a self defining term which means a group of cells with a similar structure and function that work together to perform specific tasks in an organism. The general defintion includes both living and non living tissue and is already inclusive.
21	16	218	Annex A	E	violet' is listed two times	only list violet once		**Accepted**

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22	17	25,28, 31,51,54, 80, 81, 84, 86, 87, 90, 91, 95, 96, 127, 146, 149, 161, 167, 203, 209, 211, 218, 221, 223,	3.1.3, 3.1.3.1, 3.1.3.2, 3.1.8, 3.1.8.1, 3.2.1, 3.2.1.1, 3.2.2, 3.2.3, 3.2.4, 3.3, 3.4, 3.4.1, 3.4.2, 3.5.1, 3.5.2, Annex A	E	"pattern"	Change instances of "pattern" to "suspected pattern" because what is perceived as a "pattern of dental origin" may not actually be of dental origin.	The use of pattern refers to "patterns of dental origin." As these are suspected patterns and may not actually be of dental origin, then "suspected" needs to be added to all cases of "pattern."	**Decline** The term "pattern" is used correctly as a noun, representing a specific entity. Adding the adjective "suspected" would merely describe a subset of patterns. Furthermore, "suspected" is inherently clear and does not need extra clarification when modifying "pattern" where appropriate in the document.
23	18			Ballot Comment	Bite mark "analysis" and "comparison" lacks any basis in science, as concluded by NIST, PCAST, the TX Forensic Science Comm and the NAS. This effort to define terms is, at best, pointless as it relates to so-called bite mark evidence, and could despite the disclaimers be misunderstood as to suggest there is research supporting the validity of the proposed definitions. I believe this consensus body should be focused on ensuring nothing it produces suggests that there is a scientific basis for this technique, which had led to dozens of wrongful convictions.			**Accepted With Modification** The scope clearly states that defining a term does not imply scientific validity. Many previously accepted scientific terms and concepts have been disproven as part of the evolution of scientific thought, but they are still discussed using well defined terminology. The inclusion of terms like ""patterned impressions"" and ""suspected patterns of dental origin"" in this document serves to clarify the subject, not to validate the underlying practice. Defining these terms is essential to ensure that concerns, such as those raised in the NIST report, are clearly addressed without implying that they are scientifically supported. Clear definitions help focus the discussion on areas where evidence is lacking, rather than suggesting unwarranted credibility. However, to address concerns a Preface has been added and the scope disclaimer strengthen to explicitly clarify this issue

Date of Comments Submission: 7-Mar-25
Document Number: ASB TR 194
Document Title: Terminology for a Suspected Pattern of Dental Origin
Please use a separate row for each proposed revision and justification.

Comment #	Text Line # (s)	Document Section	Type of Comment (E-Editorial T-Technical)	Current Document Wording	Proposed Revision	Revision Justification	*Working Group and Consensus Body use only, not to be completed by comme*	
							Working Group Resolution	**Final Resolution**
20				Ballot comment	I vote no for the same reasons I voted no to approve the previous document. Defining terms that have no basis in science can lead to their being misused.		Reject. Defining terms does not promote misuse—it does just the opposite. Clear, consistent terminology helps prevent misinterpretation, especially in areas under scientific review.	
21				Ballot comment	As an anthropologist, I do not have the experience and training in forensic odontology to directly refute any of the definitions in this document. That said, I feel that some of these definitions appear too specific and lack the caveats that I feel are best used in good science.		Reject. Since no specific examples were provided, it is impossible to determine whether the concerns relate to content that was redlined and open for public comment.	
3	Whole	all	E		Make font size throughout the document the same.		Accept. ASB Staff will format final document prior to publication.	
18		all	E		Alphabetize	Unless I'm missing something, it looks like these definitions are in random order.	Reject. Terms are broken up into sections with subsections and are alphabetic within each section or subsection.	
14		Preface	E	NIST. (2023). An assessment of the state of forensic bitemark analysis (NIST IR 8352). National Institute of Standards and Technology. Retrieved September 17, 2024, from https://nvlpubs.nist.gov/nistpubs/ir/2023/NIST.IR.8352.pdf	Sauerwein K, Butler JM, Reczek KK, Reed C (2023) Bitemark Analysis: A NIST Scientific Foundation Review. (National Institute of Standards and Technology, Gaithersburg, MD), NIST Interagency Report (IR) NIST IR 8352. https://doi.org/10.6028/NIST.IR.8352	Footnote 2 cited this document wrong. Corrected citation, including authorship and report title, is provided	Accept	
15		Preface	T	Finally, the rationale behind this document is in direct response to the recommendation put forward by NIST as a first step; "if the field seeks to advance, the key takeaways provided in this report are starting points for areas needing improvement, not an exhaustive list of specific shortcomings."	This document seeks to address KT 5.1 of NISTIR 8352: "Repeated calls for additional data by critics and practitioners (since at least 1960) suggest insufficient support for the accurate use of bitemark analysis and a lack of consensus from the community on a way forward." [Add specifics on how improved communication/terminology will actually lead to improved reliability of bitemark analysis]	Quote listed does not make sense as a rationale for this document. It references key takeaways from NISTIR 8352, but the preface is too vague and needs to specify which key takeaways this document addresses (and how it addresses them) as it does not address all of them. I provided an example of referencing a specific Key Takeway (in this case, KT 5.1), but I suggest that this document be more specific in its rationale. If it is meant to improve the field rather than maintain the status quo, then provide specifics for exactly how this terminology document will do that. Currently, the rationale is vague mentioning increased clarity and reduced ambiguity in terminology would result. That does not tell the user of this document anything about how improving communication will make bitemark analysis or the analysis of a "suspected pattern of dental origin" reliable, which is critical for the field to do.	Reject. This comment is outside the scope of the document, which focuses solely on defining terminology and not on evaluating the validity of bitemark analysis. It supports aspects of Key Takeaway 5.1 by providing a clear, consistent language framework necessary for future research and evaluation—and not to address all key takeaways from NISTIR 8352.	
16		Preface	T	The scope and disclaimer clearly state the goal and clarify that the document neither dictates term usage nor claims a reliable, scientifically supported methodology for applying specific terms.	More specifics about the rationale and how promoting terms in a scientific document actually does imply they are scientifically supported.	The Preface is not sufficient to address the fact that this is a practice that is not reliable. Simply stating that this document acknowledges that there is no scientific basis for bitemark analysis contrasts the fact that developing a document through ASB means (per ASB's stated purpose on their website) that it represents a "high quality, science based" standard. Therefore, appearing in an ASB standard DOES claim that these terms are scientifically supported, which many are not. I get the point that these terms may still be used and there should be some commonality in meaning. However, to do that, there needs to be some reliability behind the practice and clarifying terminology will not make the discipline reliable.	Reject. This comment is outside the scope of the document, which does not aim to establish or imply scientific validity of bitemark analysis, but rather to define terminology currently in use. While appearing in an ASB document may suggest scientific rigor, this terminology standard is limited to promoting clarity and consistency—not validating the underlying practice.	

17		Preface	T		We recognize that dental records can be used to great effect in forensic situations, such as when a deceased person's face is not identifiable due to circumstances surrounding their death (e.g., advanced decomposition, serious damage to facial features). Bitemark identification ("suspected patterns of dental origin"), however, has no scientific foundation--it is even difficult for experts to determine whether a wound is a bitemark rather than the result of some other tool or object, or whether a bitemark is from a person rather than another species (see wrongful conviction cases involving Dr. Michael West). The preface was likely added to address these concerns, but it is insufficient to mitigate the impact of implying that this is a valid forensic discipline. Simply having an ASB standards document defining bitemarks and their use in forensic contexts--even if it is just a terminology document--implies that there is some valid scientific underpinning to those terms and described activities. We also recognize that there are people who will be called to testify, and permitted to testify, about bitemarks in court and that there is some value in standardizing the terminology used by those persons even if the discipline is not foundationally valid. However, in this case, any benefit that would arise from consistency in language among people presenting bitemark evidence would not outweigh the potential harm from the implication that there is any consensus in forensic science broadly that bitemark evidence is probative and reliable.	It is impossible to propose a change to this document that would address our concerns. **We think that it is simply <u>inappropriate</u> to have an ASB standard addressing bitemark evidence or bitemark comparison.** It would imply an approval of the discipline or elements of the discipline that simply does not exist. For instance, a group of people could agree that something is useful and reliable despite a lack of evidence to show that is the case--such as astrology. There are people who believe--even rely on--astrological information and analysis. But there is little to be gained from standardizing the language of that discipline because it is not, ultimately, probative or diagnostic. It is actually harmful to for an institution that purports to create and publish standards about **scientific** disciplines to legitimize something that can appear compelling to end users, but is actually unreliable and unvalidated.	Reject. This comment is outside the scope of the document, which is limited to defining terminology currently used in the field—not validating bitemark evidence or implying scientific endorsement. The goal is to promote clarity in communication, not to assess the reliability or probative value of the discipline.	
1	5	1	ed	This document does not provide criteria for using these terms or suggest that they have a scientific basis for reliable application; their inclusion is only to ensure clarity and prevent ambiguity in other technical reports and standards.	This document does not provide criteria for using these terms, nor does it suggest that they have a scientific basis for reliable application; their inclusion is only to ensure clarity and prevent ambiguity in other technical reports and standards."	The revised text uses "nor does it" instead of "or" to correctly maintain parallel structure in negative constructions, enhancing grammatical accuracy and clarity.	Accept	
4	5-7	Scope	T	This document does not provide criteria for using these terms or suggest that they have a scientific basis for reliable application; their inclusion is only to ensure clarity and prevent ambiguity in other technical reports and standards.	Revise Scope to be more direct. Add "in fact, recent research has shown that there is no underlying scientific basis for many of the terms developed in this field."	The scope as written does not make the underlying scientific issues vanish. Despite the stated goal of the scope, many of the terms in this document only make this document, and whether and how these terms should be used less clear and more ambiguous.	Reject. This comment is outside the scope of the document, which was deliberately limited to defining terminology currently used in the field. The narrow scope was intentional to allow for future work on this topic, should the Consensus Body choose to pursue it. Scopes are deliberately written to focus on specific issues, and your comment will be considered if the CB decides to address this topic in a future effort.	
19	38	3.1	E	physical alteration in a substrate caused by the contact of the biting surfaces of an opposing teeth	physical alteration in a substrate caused by the contact of the biting surfaces of opposing teeth	While I carry no dental background, nor very good at grammar, it seems as a layman that the current wording does not match the plurality of "teeth". Should be " a tooth", or just "teeth".	Accept	
5	26-35	3.1.3 - 3.1.3.2	T	Definitions of pattern, patterned injury, and patterned impression	Revise or delete definitions	The use of the term pattern suggests reproducibility. What does discernable mean? And the inclusion of both patterned injury and patterned impression is confusing. Why is there a need for both of these terms? Why are they different, and how is that difference to be determined reliably? When documents are interpreted, if different definitions are used for similar terms, the reader is to infer that there is a reason for the difference. In "Pattern" there is an assumption that a pattern can be and is seen. In "Patterned injury" it states it "may reproduce". In "patterned impression" it "demonstrates the capacity to replicate". These are three different standards in the definitions. These definitions should have similar language, because if they don't, again, the reader will interpret that there was a reason for it. How a pattern is defined should directly lead into how patterned injury and impression are defined. And the definitions should be revised to directly acknowledge the complete lack of scientific basis for any term instead of relying on a vague scope limitation, which fails to encompass the complete lack of evidence for anything defined in this document and the wholesale rejected of bite mark evidence by the entire scientific community. Each definition needs to explicitly state that bite marks cannot and do not fall into these categories because they are not replicable.	This portion of the document was not redlined, therefor not open for public comment.	

6	32-35	3.1.3.2	T	Patterned Impression: surface alteration demonstrating the capacity to replicate the characteristics of the object causing the alteration.	Revise or delete definition	What is an alteration? How does one determine if that alteration actually demonstrates "the capacity to replicate the characteristics of the object..."? This definition gets to the core of why this standard should be retracted. At least as it relates to bite marks, *all* available scientific evidence demonstrates that skin does not have the "capacity to replicate the characteristics of the object causing the alteration." There is thus no basis for this definition, and the vague scope limitation does not, and cannot, cure the fundamental problem. This document should be retracted in its entirety.	This portion of the document was not redlined, therefor not open for public comment.	
8	36-38	3.1.4	E	an opposing teeth	revise to clarify.	This definition is unclear. also, is "an" used properly?	Accept	
9	39-42	3.1.5	T	"...not a result of the closure of the mouth"	Revise or remove	How can this be concluded with any reliability? What is the scientific basis for knowing that the mouth closed or not?	This portion of the document was not redlined, therefor not open for public comment.	
10	43-46	3.1.6	T	information of sufficient usefulness to serve as the basis for making an empirically significant scientific determination.	Revise or remove.	This definition is troubling and incredibly vague. What does "sufficient usefulness" mean? And what exactly is meant by "empirically significant scientific determination"? What context is this scientific determination being made in? Additionally, this definition seems to be internally repetitive. Lastly, the term "evidentiary value" confuses legal and scientific concepts. Whether something is of "evidentiary value" is a complex determination that belongs, to a judge exercising their gatekeeping duties in the first instance, and factfinders who hear and weigh such evidence in the second. The OSAC Lexicon entry for Reliability Evidentiary/Legal (https://www.nist.gov/glossary-term/30771) only makes the use of this term seem even more problematic.	This portion of the document was not redlined, therefor not open for public comment.	
11	49	3.1.7	T, E	spurious observation anomaly not intrinsically present feature not related to the source	Revise or clarify.	Is this one sentence or two? This definition needs to be better constructed and suggest reviewing the other ways "Artifact" is defined in the OSAC Lexicon.	This portion of the document was not redlined, therefor not open for public comment.	
12	50-76	3.1.8, 3.1.8.1, 3.1.8.1.1, 3.1.8.1.1.1, 3.1.8.1.1.1.1	T	All	Remove	These are five different terms that endorse, five times, the idea that these things are valid. The Notes say that it describes a "process", but there is no description of a process. And the idea that for each of these terms there is a "process" implies that the process is something that is developed, reproducible, and valid --- which of course this is not.	This portion of the document was not redlined, therefor not open for public comment.	
7	56-57, 61-62, 66-67, 73-74,	Note to entry	T	Note to entry The purpose of this definition is to describe a process and is not an endorsement of its scientific validity.	Revise to say: Studies have shown that there is no scientific validity to this technique.	These definitions are describing a process that has no scientific basis, but the very existence of this document inherently suggests that it does. These definitions begin from the assumption that they relate to a process that is acceptable and have scientific merit, an assumption that we know is false as it relates to bite marks. The disclaimer doesn't solve that problem. At best, it begs the question of why ASB is producing a scientific standard for something that it cannot endorse as scientifically valid, and at worst, it undermines the now decades of scientific evidence that teaches, without exception, that bite mark evidence is completely unscientific, wholly unreliable, and should never be used. This entire document is highly problematic, and nothing in the scope or in these notes fix those problems. The only real solution is to withdraw this document. At a minimum, qualification to *each* and *every* term about their lack of a scientific basis should be added.	This portion of the document was not redlined, therefor not open for public comment.	
13	78-82, 86-97, 104, 109, 126-129, 145-150, 160-162, 166-168, 193-198, 202-204	3.2, 3.2.1, 3.2.2, 3.2.3, 3.2.4, 3.2.4.2, 3.2.5, 3.2.5.5, 3.3, 3.4, 3.4.1, 3.4.2, 3.5.1, 3.5.1.7, 3.5.1.8, 3.5.2	T	All	Remove	These terms and definitions are based, at least in part, on an unproven ability to reliably distinguish a pattern. The very idea of something being a pattern implies reproducibility. If this document is wanting to create a list of terms, it should only include terms that are either free of implicit endorsement or are scientifically valid.	This portion of the document was not redlined, therefor not open for public comment.	
2	247	Annex B	T	None	Add a citation to the NIST Foundation Review. Sauerwein K, Butler JM, Reczek KK, Reed C (2023) Bitemark Analysis: A NIST Scientific Foundation Review. (National Institute of Standards and Technology, Gaithersburg, MD), NIST Interagency Report (IR) NIST IR 8352. https://doi.org/10.6028/NIST.IR.8352	Citing this study will bring further context to the bibliography which contains several works that continue to claim a scientific basis for bite mark comparison. The NIST report is also cited in several of the responses to comments.	Reject. The referenced study was deliberately not included because the OSAC Registry already contains a draft terminology standard, and the authors of that study did not conform to it—resulting in ambiguity in their conclusions. Including a study that had the opportunity to follow a publicly available, Registry approved standard but failed to do so would undermine the clarity and consistency this document aims to establish, and therefore was not appropriate.	