

May 23, 2005



Mr. Bruce A. Brody,
Associate Chief Information Officer for Cyber Security
IM-30/Forrestal Building
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Brody:

We are writing to express our serious concerns about the negative implications of the application of the Homeland Security Presidential Directive 12 (HSPD-12) on the research currently being conducted at U.S. national laboratories.

As members of the RHIC & AGS Users' Executive Committee (UEC) at Brookhaven National Laboratory (BNL), we represent 1,600 users from over 272 institutions in 29 countries. Our users are scientists, students, and post-docs who conduct nuclear and high-energy physics experiments, studies of radiobiological effects on humans, and R&D in physics and manufacturing by using one of Brookhaven's user facilities. These facilities include the Relativistic Heavy Ion Collider (RHIC), Alternating Gradient Synchrotron facility (AGS), NASA Space Radiation Laboratory (NSRL), Tandem Van de Graaff, and the Accelerator Test Facility (ATF).

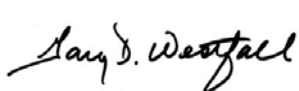
As you know, HSPD-12 specifies the use of a Personal Identity Verification (PIV) standard to grant access for federal employees and contractors to federally controlled facilities and computing resources. The FIPS PUB 201 draft standard focuses precisely on that scenario. However, only 250 of our 1600 users are federal employees or contractors. More than half are not US citizens and not residents of the U.S. The vital contributions of these users are crucial to the success of Brookhaven's scientific programs. Our concern is that with the ambiguities in the FIPS PUB 201 draft, it may be applied beyond the environment for which it was apparently intended. If it is applied broadly, such as to access by non-federal employees and non-contractors to scientific user facilities at the National Laboratories, then the majority of work at the science labs will be stopped or reduced significantly.

Although we fully support the goals of the Office of Homeland Security, we urge you to carefully consider all possible negative implications to scientific research of HSPD-12. For example, if it will be applied to physical facilities and computing systems at the National Laboratories, then there must be a reasonable mechanism for people who are not federal employees, not federal contractors, not citizens, or not physically present at the facility to continue their legitimate use of these facilities and systems. We encourage DOE to use a graded approach in the applications of HSPD-12 so as not to negatively impact the science mission of the user facilities at BNL.

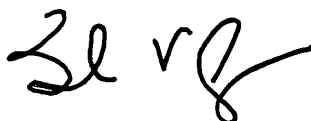
We strongly recommend adoption of the primary approach recommended by the DOE Laboratory Directors' System of Labs' Computing Coordinating Committee (SLCCC)

White Paper of 20 May 2005. Namely, that DOE should "Require M&O contractors to use PIV cards when accessing federal systems, but not require the use of PIV for access to contractor-operated facilities such as the laboratories."

Sincerely,



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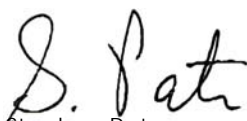
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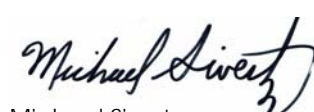
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