



INFORMATION TECHNOLOGY
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August 5, 2008

The Honourable Stockwell Day, MP, PC
Minister of Public Safety

Dear Minister Day:

Subject: RFID and Enhanced Driver's Licences

The Information Technology Association of Canada (ITAC) is the voice of the Canadian information and communications technologies industry. The Advanced Card Association of Canada (ACT Canada) promotes the awareness, understanding and use of all advanced card technologies across a wide range of applications.

ITAC and ACT Canada share concerns expressed by Canada's Privacy Commissioners and Privacy Oversight Officials in their resolution titled *Privacy Concerns about Enhanced Driver's Licences* (February 5, 2008).

Our organisations understand and support the need for enhanced security and efficiency at Canada's border with the United States, and believe that radio frequency identification (RFID) technologies offer effective solutions for many border problems. However, only certain RFID technologies will be suitable for use in any given situation. For example, some are designed to facilitate the movement of goods or animals while others are designed to meet the more demanding privacy and security requirements associated with human identity management.

We are concerned that the particular RFID technology being considered for adoption in enhanced driver's licences (EDL) issued by Canada's provinces would alone not be sufficiently secure or sufficiently protective of personal privacy. We stress that suitable features are available in other RFID technologies and are being deployed globally in situations that require high levels of security and privacy.

For example, ePassport, an International Civil Aviation Organisation standard, is being implemented globally – including Canada and the US. Its specifications are based on numerous ISO/IEC standards – including the ISO/IEC 14443 proximity contactless standard. (In general terms, EDL calls for proximity RFID solutions rather than vicinity

RFID solutions.) The 14443 standard, which is widely used in applications such as ticketing, contactless credit and debit cards and access control, has a read range of only 10 centimetres – unlike the technology under consideration for EDL. To augment security and to address the need to protect privacy, ePassport also features an encryption technique that uses public-key infrastructure and prevents access without proper authentication and authorisation.

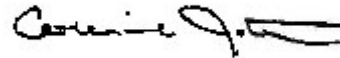
We would be pleased to provide additional information or to further discuss security and privacy in RFID technologies related to or future initiatives. As noted above, we would not want to see RFID in general cast in a bad light as a result of concerns with this high-profile deployment.

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Yours truly,



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