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July 15, 2019

Ms. Sara Lavoie
Director, Enforcement Services
Massachusetts Registry of Motor Vehicles

Dear Ms. Lavoie:

IDEMIA has learned that the Federal Bureau of Investigation (FBI) has recently sent a survey to state motor vehicle agencies in response to Congressional and Government Accountability Office requests for further details about facial recognition technologies in use at the state level. To assist you in responding to the survey from the FBI, we want to communicate with you about the version of the IDEMIA facial recognition system deployed within your state and provide you with information about NIST testing. Our hope is that this information will ease your ability to complete the survey questions from the FBI.

Separately, I also want to share with you a document we have prepared with principles we believe are vital to any implementation of facial recognition technologies. To the extent you wish to express your support or communicate to the FBI that your facial recognition program reflects these principles, we believe it will help reinforce that your agency takes seriously its oversight and management responsibilities in deploying facial recognition to reduce fraud at the DMV.

Should you have any questions, please don't hesitate to reach out to me. If you need further information, we are at your disposal.

Sincerely,

David Kunen
General Manager, Northeast Region
Idemia Identity & Security, N.A.

Enclosures

IDEMIA Facial Recognition System Deployment Information

- 1) What facial recognition algorithm do you currently use within your system (e.g., algorithm vendor and version number)?**

Vendor is IDEMIA Identity and Security North America
Algorithm in use is ABIS 8.1

- 2) Is your facial recognition system configured to always return a candidate list of a fixed (or specified) size or does it return candidates over a given match score threshold.**

The system deployed returns candidates with similarity values over a specific threshold.

- 3) Was the algorithm tested to verify it met defined system performance requirements before your purchase (e.g., National Institute of Science and Technology Facial Recognition Vendor Test, or your organization's internal regression tests)? If so, please provide your defined system performance requirements (e.g., false negative identification rate, false positive identification rate, true positive identification rate, etc.) as it applies to your system configuration.**

IDEMIA participates each year in NIST's FRVT tests. Our algorithms consistently perform in the top levels of results in these tests and specific performance data from the most recent test can be obtained at <https://nvlpubs.nist.gov/nistpubs/ir/2018/NIST.IR.8238.pdf>. Reports for previous years are also available on the NIST website.

IDEMIA also performs extensive regression tests on each new version of our algorithm to confirm accuracy and speed improvements.