



**Transportation Worker Identification
Credential (TWIC) Qualified Technology List
(QTL) Program
Administrative Manual**

Version 1.3

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Department of Homeland Security
Transportation Security Administration
Office of Security Policy and Industry Engagement
601 S. 12th Street
Arlington, VA22202

Administrative Manual

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Administrative Manual

Table of Contents

1	Introduction.....	1
1.1	Background	1
1.2	Purpose.....	1
1.3	Scope	2
1.4	Contact Information	2
2	Definitions.....	3
3	Roles and Responsibilities	6
3.1	TWIC QTL Program Management Office	6
3.2	Applicant	7
3.3	Laboratories.....	7
3.4	Customer	8
4	TWIC QTL Program Operations	9
4.1	Compliance with Relevant Standards	9
4.2	Conformity Testing Process and Activities.....	9
4.2.1	The Application Package	9
4.2.2	Review of Application Package.....	10
4.2.3	Review of Test Results	10
4.2.4	Listing Decision	10
4.2.5	TWIC Qualified Technology List.....	10
4.2.6	Listing Cycle.....	11
4.2.7	Changes.....	11
5	Listing Status	13
5.1	Listed Status	13
5.2	Maintaining Listed Status.....	13
5.3	Suspending Listed Status	13
5.4	Revoking Listed Status.....	14
5.5	Request for Withdrawal of Listed Status	14
6	Program Administration.....	15
6.1	Applicant Identification.....	15
6.2	Version Control	15
6.3	Records and Applicant Files	15
6.4	Sample Product Storage	15
6.5	Confidentiality.....	15
6.6	Dissemination of Information and Communications	16
6.6.1	Website	16
6.6.2	Administrative Clarifications.....	16
6.7	Notifications.....	16
6.7.1	Applicant Notifications.....	16
6.7.2	Laboratory Notifications.....	16
6.8	Communications.....	16
6.9	Changes in Program Requirements	16
6.10	Field Issues and Responses.....	17

Administrative Manual

7	Program Personnel	18
7.1	PMO Chief	18
7.2	Qualifications and Training.....	18
7.3	Confidentiality.....	18
7.4	Data Access	18
7.5	Conflict of Interest	18
8	Complaints	19
8.1	Submitting a Complaint	19
8.2	Procedure for Dealing with Complaints.....	19
9	Appeals	20
9.1	Special Review Committee	20
	Appendix –A Flow Charts	21
A.1	TWIC QTL Listing Process	21
A.2	TWIC QTL Upgrade Listing Process	22
A.3	TWIC QTL Suspension Process	23
	Appendix B – Agreement and Forms	24
B.1	TWIC QTL Program Applicant Agreement	24
B.2	TWIC QTL Program Product Application	27
B.3	TWIC QTL Declaration.....	30
	Appendix –C Bibliography.....	32

1 Introduction

1.1 Background

The United States Congress mandated the Transportation Worker Identification Credential (TWIC) in the Maritime Transportation Security Act of 2002 (MTSA) as amended by the Security and Accountability for Every Port Act of 2006 (SAFE Port Act). The mission of the TWIC Program is to design and field a tamper resistant credential (referred to as a TWIC Card) for all maritime workers requiring unescorted physical access to secure areas of the nation's port facilities, outer continental shelf facilities, and vessels regulated under the MTSA, and all U.S. Coast Guard credentialed merchant mariners. The TWIC program is administered by the Department of Homeland Security (DHS) with joint management responsibility shared by the Transportation Security Administration (TSA) and the U.S. Coast Guard. TSA is responsible for enrollment, identity vetting and credential issuance. The Coast Guard is responsible for enforcement, access control requirements and regulations.

The TWIC card is subject to visual inspection at points of entry or can be automatically read and validated by reader devices which have been deployed by maritime operators. The TWIC Reader Hardware and Card Application Specification (hereafter, referred to as the TWIC Specification) is a document issued by the TSA which describes the behavior of the TWIC card application, card interface, as well as the reader hardware performance and technical requirements. The TWIC specification addresses both fixed and portable reader devices.

The Transportation Security Administration (TSA) working with the Department of Homeland Security (DHS), the National Institute of Standards and Technology (NIST), and other federal agencies has established a process and program to test and qualify products that read, verify, and authenticate the TWIC cards used in the TWIC Program. Products that are deemed to be compliant with the TWIC Specification will be placed on a list referred to as the TWIC Qualified Technology List (QTL) which can be used by owners and operators of regulated maritime facilities and vessels to assist in their TWIC reader purchasing decisions.

The TSA TWIC Program Management Office operating under the Office of Security Policy and Industry Engagement (OSPIE) has established the QTL program to provide an on-going process of TWIC reader qualification by independent laboratories accredited by NIST under the National Voluntary Laboratory Accreditation Program (NVLAP). The initial focus of the QTL effort is to establish NVLAP accredited test laboratories capable of assessing the conformance of fixed and portable TWIC readers with the TWIC Reader Hardware and Card Application specification.

1.2 Purpose

The purpose of the TWIC QTL Program is to provide confidence to its consumers that TWIC products listed on the TWIC QTL meet the technical requirements in the TWIC Specification as well as other TSA programmatic requirements.

The TWIC QTL provides purchasers with information on TWIC system components that meet the TWIC specification such that informed purchasing decisions regarding the products to be deployed can be made.

1.3 Scope

This manual provides the TWIC QTL Program operational structure and program participants along with their roles and responsibilities, as well as policies and procedures necessary for its successful operation

The scope of the TWIC QTL Program is limited to the listing of TWIC-readers based on requirements within the TWIC Reader Hardware and Card Application Specification and any subsequent clarifying Technical Bulletins issued by TSA. The current version of this specification is v1.1.1, dated May 30, 2008 and is the basis for the TWIC QTL Program.

For more information on the QTL Program, visit the TSA TWIC web site at www.tsa.gov/twic/ctl.

1.4 Contact Information

Parties having questions as to the content, applicability, or interpretation of this document may address their comments to:

Attention: James Orgill
Transportation Security Administration
Office of Security Policy and Industry Engagement
TWIC Program Management Office
601 S. 12th Street
Arlington, VA 22202

Phone: (571) 227-3245

Email: james.orgill@tsa.dhs.gov

2 Definitions

For the purpose of this document, the relevant definitions given in ISO/IEC 17000 apply, together with the following definitions:

Term	Definition
Active	The status of a TWIC system component that is currently listed on the TWIC QTL for which all technical and administrative requirements have been met.
Appeal	A formal review process when a complaint is not resolved to the satisfaction of the complainant.
Applicant	The entity that submits a product for listing to the TWIC QTL Program. The Applicant may or may not be the manufacturer.
Approval Procedure	TWIC product-specific procedures and requirements that satisfy the TWIC Specification and Implementation Guidance. These procedures form the basis for qualification of a product for listing on the TWIC QTL.
Authorized Point of Contact	An employee or officer of the Applicant who is qualified and authorized to respond on behalf of the Applicant to questions from the TWIC QTL Program regarding the information contained in the application and/or the technical aspects of a product submitted for testing.
Authorized Representative	An employee or officer of the Applicant who is qualified and authorized to represent Applicant and enter into binding agreements on behalf of the Applicant.
Complainant	A person or organization filing a complaint with the TWIC QTL Program.
Complaint	A formal written expression of dissatisfaction raised to the TWIC QTL Program regarding its activities or service.
International Laboratory Accreditation Cooperation (ILAC)	The International Laboratory Accreditation Cooperation is an international cooperation of laboratory and inspection accreditation bodies. Accreditation bodies around the world, which have been evaluated by peers as competent, have signed an arrangement that enhances the acceptance of products and services across national borders. The purpose of this arrangement, the ILAC Arrangement, is to create an international framework to support international trade through the removal of technical barriers.
Laboratory	An entity that tests the TWIC system component to demonstrate conformance to requirements specified in the Approval Procedure.

Administrative Manual

Letter of Conformity	A letter issued on a TSA letter-head stating the conformance of an Applicant's product to a set of technical requirements.
Listed Status	A statement from the TWIC QTL Program related to products, based on a decision following review, that fulfillment of specified requirements has been demonstrated.
Master Document List	A list of all documents and their latest version managed under the TWIC QTL Program.
Non-Compliant	Status of a TWIC product when testing demonstrates that the TWIC product does not satisfy one or more of the TWIC QTL Program requirements.
National Voluntary Laboratory Accreditation Program (NVLAP)	NVLAP provides accreditation services through various laboratory accreditation programs (LAPs), which are established on the basis of requests and demonstrated need. Each LAP includes specific test or calibration standards and related methods and protocols assembled to satisfy the unique needs for accreditation in a field of testing or calibration. NVLAP accredits public and private laboratories based on evaluation of their technical qualifications and competence to carry out specific calibrations or tests.
Quality Management System (QMS)	A documented set of processes, policies and procedures governing business practice.
Revoked	The status of a formerly QTL-listed product when one or more of the required conditions for listing is no longer satisfied. Revoked TWIC products are removed from the QTL and placed on the Removed Technology List (RTL).
Suspended	The listed status of a QTL-listed TWIC system component when one or more of the required conditions for listing is no longer satisfied. Suspended TWIC products remain on the QTL and are clearly distinguishable from active products for the duration of the suspension period.
TWIC Qualified Technology List (QTL)	A publicly accessible record of TWIC products that have successfully met all technical and administrative requirements of the TWIC QTL Program
TWIC QTL Program	The entity that controls all activities related to the management and operation of the program.
TWIC QTL Program Management Office (PMO)	The entity that is responsible for the oversight, management and overall success of the TWIC QTL Program.
TWIC Removed	A publicly accessible record of formerly QTL-listed TWIC

Administrative Manual

Technology List (RTL)	products that have been removed from the TWIC QTL and placed on the RTL because the product listing status is revoked or withdrawn.
TWIC reader	A card reader implementing the minimum set of technical requirements for listing on the TWIC QTL.
Withdrawn	The listing status of a formerly QTL-listed TWIC product that has been withdrawn at the request of the TWIC product's authorized representative. Withdrawn TWIC products are removed from the QTL and placed on the Removed Technology List (RTL)

3 Roles and Responsibilities

The organization that manages the TWIC QTL Program is the TSA. The TWIC QTL Program encompasses all activities related to the testing of TWIC products and the management of the QTL. The following are the roles and responsibilities associated with the TWIC QTL Program.

3.1 TWIC QTL Program Management Office

The TWIC QTL Program Management Office (PMO) is the entity responsible for the oversight, management and overall success of the TWIC QTL Program. The PMO is responsible for:

- Providing appropriate administration of the TWIC QTL Program with confidential and impartial treatment of Applicants.
- Maintaining approval procedures which describe the technical requirements that must be met by the TWIC system component for listing on the TWIC QTL.
- Identifying the methods describing the tests that are executed by a laboratory to demonstrate conformity of TWIC products to the TWIC specification.
- Maintaining policy relating to the TWIC QTL Program operation.
- Reviewing application submissions to make the determination if the application package is complete, conforms to the requirements of the TWIC QTL Program and if the TWIC product is compliant with the TWIC specifications.
- Issuing all decisions regarding granting, maintaining, suspending, revoking and withdrawing listed status.
- Maintaining the QTL which is a listing of TWIC products that have been found to successfully meet the minimum set of technical requirements.
- Maintaining the Removed Technology List (RTL) which is a listing of TWIC products that have been removed from the QTL for cause. TWIC products listed on the RTL were once listed on the QTL but since then have either been revoked or withdrawn.
- Clarifying ambiguities within the specification and test methods by issuing publicly-accessible implementation guidance and answering frequently asked questions (FAQs).
- All decisions regarding disposition of complaints.
- Providing due notice of any changes in TWIC requirements, taking into account views expressed by interested parties.
- Disseminating all publicly available TWIC QTL information through the www.tsa.gov/twic/qtl and other means as appropriate.
- Maintaining and securing records of all documentation and artifacts produced as a result of the TWIC QTL Program operation.

- Issuing conformity letters to the Applicant for products that are determined to meet the minimum set of technical requirements.

3.2 Applicant

The Applicant is an entity that submits one or more TWIC products for listing to the PMO. Although the Applicant may or may not be the manufacturer, the Applicant must have the authority to control the manufacturing of the TWIC product. The Applicant is responsible for:

- Abiding by all terms and conditions and complying with all requirements of the agreement section of application form.
- Complying with requirements and procedures set forth in this document.
- Entering into an agreement with the PMO as an entity submitting TWIC products for listing under the TWIC QTL Program (i.e. applying for participation).
- Submitting products to the appropriate laboratories for testing.
- Preparing and submitting the completed application package to the PMO for TWIC QTL listing.
- Supporting the process including responding to inquiries from the PMO and the laboratories in a timely fashion by designating a contact person that the PMO can contact as necessary.
- Notifying the PMO of changes in ownership or legal name and/or changes in TWIC product Applicant or manufacturing locations.
- Checking (if necessary) with the PMO whether the laboratories selected to perform testing have the necessary scope of test methods under their accreditation.

3.3 Laboratories

The Laboratories are third-party entities that test TWIC products in accordance with the applicable test methods to demonstrate the product's conformance to the technical requirements. These laboratories shall have an appropriate laboratory accreditation body and scope of accreditation as defined below.

- Laboratories providing testing services for TWIC product functional requirements shall be accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) for an appropriate scope of test methods.
- Laboratories providing testing services for TWIC product environmental, electromagnetic compatibility, electrical, safety and reliability requirements shall be accredited by a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) for an appropriate scope of test methods.

The Laboratories are responsible for:

- Contracting directly with the Applicant. The contract with the Applicant shall include a provision that allows the laboratory to respond to requests from the PMO for additional information.
- Performing tests in accordance with TWIC QTL Program documentation.
- Providing test report(s) that meet the TWIC QTL Program requirements directly to the Applicant.
- Providing additional information, upon request, to the PMO concerning the testing and test reports for purposes including approval, listed status, and appeals.

3.4 Customer

The Customer is an entity that purchases TWIC products that are listed on the TWIC QTL for enabling unescorted access to secure areas of port and vessels regulated under the Maritime Transportation Security Act of 2002 (MTSA), in order to meet the requirements of 33 Code of Federal Regulations (CFR) 125 rule. The Customer is responsible for the following:

- Selecting appropriate products for deployment from the TWIC QTL.
- Requesting information or clarification regarding a particular product that is currently listed on the TWIC QTL or being reviewed and considered for listing by the PMO.
- Providing feedback to the PMO regarding a fielded product that was selected from the TWIC QTL for deployment.

4 TWIC QTL Program Operations

4.1 Compliance with Relevant Standards

The TWIC QTL Program is administered in accordance with the requirements for product certification bodies as defined by ISO/IEC Guide 65.

In conducting its conformity assessment operations, the PMO observes requirements for suitability and competence of organizations/laboratories performing testing as specified in ISO/IEC 17025, in selected parts of ISO/IEC 17020, and in other requirements defined by the program.

4.2 Conformity Testing Process and Activities

The following illustration depicts the different entities involved in the TWIC QTL Program and shows the interactions amongst them. The step-by-step process followed for TWIC product listing on the TWIC QTL is provided in Appendix A.

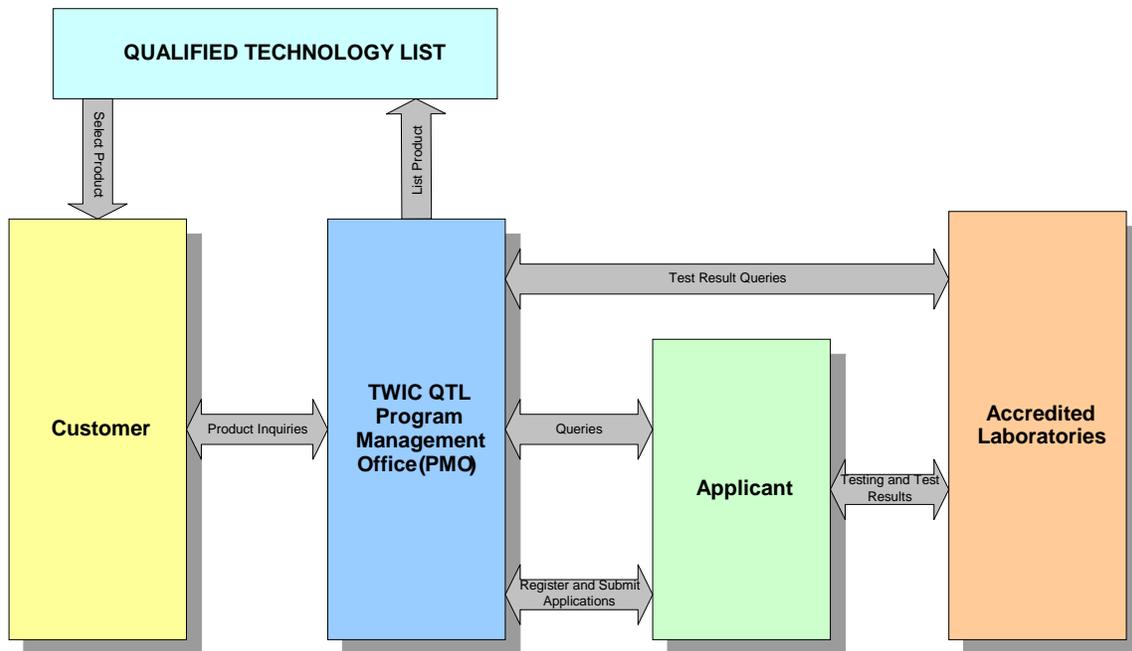


Figure 1 - TWIC Participant Interactions

4.2.1 The Application Package

To participate in the Program, Applicants begin preparing the application package(s) for submission to the PMO for listing of their product(s). The Application package includes (i) the product application form, (ii) Applicant and product documentation, and (iii) any test results obtained from appropriately accredited, third-party test laboratories demonstrating conformity to optional technical requirements of the TWIC Specification.

4.2.2 Review of Application Package

The PMO reviews the application package provided by Applicant including submitted documentation and the test reports issued by the testing laboratories for completeness and accuracy, and conducts a detailed examination (product review) to assess the product's conformance to the TWIC specification and its characteristics claimed by the applicant.

4.2.3 Review of Test Results

A conformity checklist is assembled by the PMO after review of appropriate artifacts and test report issued by the testing laboratory for the product under test. If the PMO determines the product does not comply, details for action are provided to the Applicant. The Applicant must provide written evidence of resolution of non-conformities within specified time limits.

4.2.4 Listing Decision

The decision as to whether or not to list a product on the TWIC QTL shall be rendered by the PMO on the basis of the information gathered during the review of (i) the product, (ii) Applicant documentation, (iii) test artifacts and results, and (iv) any other relevant information. The authority for granting, maintaining, suspending, revoking and withdrawing the listing status of a product is reserved by PMO and is not delegated to any other party outside of TSA at any time.

If the product is determined to meet the minimum set of requirements from the TWIC specification, the PMO issues a letter of conformity to the Applicant and places the product on the TWIC QTL. The letter and the listing on the TWIC QTL shall state the effective date of conformance as well as highlight the features of the product that were tested (i.e. authentication modes supported, indoor or outdoor use, cryptographic algorithms supported, any limitations vis-à-vis the TWIC specification with respect to environmental requirements, etc.).

4.2.5 TWIC Qualified Technology List

The TWIC QTL makes attestation of product conformity in the form of inclusion on the publicly accessible TWIC QTL.

The TWIC QTL includes, but is not limited to, the following product information groups based on the TWIC Specification version:

- Product Type (e.g. Fixed or Portable Reader)
- Product Manufacturer
- Product Name and Model
- Manufacturer Point of Contact (Authorized Representative)
- Product Features

- Authentication Modes Supported
- Indoor or Outdoor Use
- Backend communication interfaces (e.g. Wiegand, Wireless, Ethernet, RS 485)
- Limitations with respect to environmental requirements (e.g. temperature)
- Effective Date of Conformance

4.2.6 Listing Cycle

Once a product is listed on the TWIC QTL, it will remain on the list until it is revoked or the Applicant voluntarily requests withdrawal of that product. The products on the TWIC QTL shall be segregated by the version of the TWIC specification that they were determined to be compliant with.

4.2.7 Changes

4.2.7.1 Product Changes

Over the course of a product lifecycle, Applicants may need to update their product based on advances in technology. The process for upgrading a product listed on the TWIC QTL is detailed below:

- The Applicant shall submit a notice of intent in writing to the PMO with their intent to upgrade their product currently listed on the TWIC QTL.
- Along with the notice, the Applicant shall also describe in writing the changes/enhancements that have been made to the new version of the product and the differences between the new product and the one listed on the TWIC QTL.
- The PMO will review the changes described and provide the Applicant with the set of requirements that need to be re-tested.
- Once re-testing is completed, the Applicant submits the relevant documentation and the new test results. If the results are acceptable, the PMO will add the new product to the TWIC QTL and issue a new letter of conformity. Depending on the scope of the product change, the previous version of the product may be annotated on the TWIC QTL if applicable (e.g. superseded by newer version, not offered for sale by the vendor etc.).

4.2.7.2 Specification Changes

When an updated version of the TWIC specification is released, the PMO shall notify Applicants at least 60 days in advance of the end of the transition period (i.e. the effective date of the specification) after which time all currently listed TWIC QTL products will be listed on the TWIC QTL under the previous specification version.

Administrative Manual

The PMO shall publish a list of new/revised tests that need to be conducted based on the changes contained within the new specification. Applicants need to submit test results demonstrating conformity to the new requirements for their existing products or submit upgraded products for listing through the TWIC QTL Program.

Dependent on the revisions to the TWIC specification, the PMO will make the determination whether to continue listing products on the TWIC QTL conformant to the previous specification.

5 Listing Status

The PMO specifies the conditions for granting, maintaining, suspending, revoking and requesting withdrawal of each listed TWIC product based on conformance to administrative and technical requirements of the TWIC QTL Program.

All notifications regarding the listing status of a TWIC system component are made in writing.

5.1 Listed Status

The PMO issues a letter of conformity to Applicants informing them that the TWIC system component identified by its name, model designation and software/firmware version has met the minimum set of technical requirements and will be listed on the TWIC QTL. The letter as well as the listing shall state the effective date of conformance as well as highlight the features of the TWIC product that were tested (i.e. authentication modes supported, indoor or outdoor use, cryptographic algorithms supported, any limitations of the TWIC product with respect to environmental requirements, etc).

5.2 Maintaining Listed Status

In order to maintain a listed status, the TWIC product shall (i) be compliant with the version of the TWIC specification that it was tested against and (ii) continue to perform as expected based on the results of the testing conducted without any complaints from the field.

The Applicant shall make no change (form, fit or function) including any manufacturing changes to the listed TWIC product model without written authorization from the PMO. Prior to any change in the listed TWIC product, the Applicant shall notify the PMO in writing and the notification shall fully document the proposed change. Based on the proposed changes documented for the product, the PMO will make a determination on the subset of tests that need to be conducted; if necessary.

Any significant change to a listed TWIC reader will result in a re-assessment of the product and a new designation. Only insignificant changes will be considered by the PMO. Examples of insignificant changes include, but are not limited to, changes in color or label location.

5.3 Suspending Listed Status

The PMO may temporarily suspend the listed status of a TWIC product when one or more of the required conditions for listing are not met (either intentionally or unintentionally) due to an action or inaction on the part of the Applicant.

Suspended models will remain on the TWIC QTL but will be clearly distinguished from fully compliant models for the duration of the suspension period. Within the suspension

period, the Applicant shall take the appropriate measures to correct the deficiency or else it will be moved to the TWIC RTL.

The PMO will issue a TWIC QTL Advisory Notice for each suspended model.

5.4 Revoking Listed Status

The PMO may permanently revoke the status of a listed TWIC product when one or more of the required conditions for listing fail to be met due to either an intentional or unintentional action or inaction on the part of the Applicant.

Revocation of the model results in removal of the model from the TWIC QTL. The PMO will issue a TWIC QTL Advisory Notice for each revoked model.

5.5 Request for Withdrawal of Listed Status

The Applicant may request that the PMO withdraw the listing of a TWIC product from the TWIC QTL. Applicant requests for withdrawal shall be submitted to the PMO in formal written correspondence that includes an explanation of the request and confirmation that there are no outstanding performance issues associated with the TWIC system component.

Withdrawal of the TWIC system component's listing status results in removal of the product from the TWIC QTL. The PMO will issue a TWIC QTL Advisory Notice for each withdrawn model.

6 Program Administration

6.1 Applicant Identification

Each Applicant shall be assigned a unique identification number. Each model submitted for listing shall be assigned a unique test identification number linked to the Applicant identification number.

6.2 Version Control

All Program documentation will be maintained using a version control system and entered into a Master Document List.

Modifications, corrections or changes to any of the program documentation (e.g. administrative manual, approval and test procedures, agreements, forms, report templates etc.) are restricted to the PMO.

6.3 Records and Applicant Files

The TWIC QTL Program maintains a records management system that fully documents program activities and demonstrates that procedures for TWIC QTL listing have been effectively followed, particularly with respect to application forms, evaluation reports, conformity assessment follow-up activities and other documents relating to listing status. Records include but are not limited to, applications, agreements, correspondence with Applicants and advisory notices. All PMO records are retained for a minimum of five years.

6.4 Sample Product Storage

All Applicant Products received by the PMO as part of application package submission shall be stored for a minimum of five years beyond the effective date of the newer specification. Products that are withdrawn from the TWIC QTL shall be returned if requested.

6.5 Confidentiality

The PMO has in place measures to safeguard confidentiality of the information obtained in the course of its conformity assessment activities at all levels of the organization. External organization personnel (e.g. contractors) who serve as experts are required to sign non-disclosure agreements to maintain confidentiality. Additionally, the PMO maintains confidential Applicant information (e.g. application submission packages) in electronic program document files in an encrypted database to protect the files against unauthorized access.

All requests for product information (e.g. listing status, features tested etc.) from potential customers shall be directed to the Applicant unless it is public information. Information gained about a particular product in the course of listing activities will not be disclosed to a third party without written consent of the Applicant. Any information or data considered by the PMO to be proprietary will not be released.

6.6 Dissemination of Information and Communications

6.6.1 Website

The PMO shall communicate all relevant information regarding TWIC specification and implementation guidance via www.tsa.gov/twic/qtl. The relevant specification, the TWIC QTL Administrative Manual, Applicant Forms, Approval and Test Procedures and the TWIC QTL are the primary information sources on the Web site, but updates, administrative clarifications, and advisory notices are also provided as appropriate.

The contact information for the PMO is placed at the beginning of all key documentation.

6.6.2 Administrative Clarifications

Administrative clarifications will be issued by the PMO on an as-needed basis when questions arise regarding TWIC requirements. These clarifications will be published and available on www.tsa.gov/twic/qtl.

6.7 Notifications

6.7.1 Applicant Notifications

The PMO shall communicate any issues arising during conformity testing through Applicant Notifications. These notifications inform the Applicant of findings and actions required in response to these findings. All Applicant Notifications are filed in the appropriate Applicant folder.

6.7.2 Laboratory Notifications

During the assessment of the application package, the PMO may communicate directly with the test laboratory to seek clarification on the testing and its corresponding results prepared by the laboratory. In such cases, the Applicant will also be notified of the request. All Laboratory Notifications are filed in the appropriate Applicant folder.

6.8 Communications

All communications concerning the TWIC QTL Program may be submitted via e-mail, phone or postal mail using the contact information provided in Section 1.4.

6.9 Changes in Program Requirements

The TWIC QTL Program will give due notice of any changes it intends to make in its requirements for listing of TWIC products. The TWIC QTL Program will take into account views expressed by interested parties for these changes.

The PMO will publish changes to requirements for listing of products in a timely manner. Following the change, each applicant can make necessary adjustments to their product to be conformant with the current TWIC requirements before the end of a reasonable transition period, or continue to have their product listed under the previous specification version of the TWIC QTL.

6.10 Field Issues and Responses

The PMO shall respond to information from the field (e.g. maritime operators) concerning listed TWIC products.

Responses may entail gathering and analyzing additional information, and/or requiring additional testing or other measures (including suspension of the listed TWIC product) that the PMO determines to be appropriate.

7 Program Personnel

7.1 PMO Chief

The PMO Chief has budgetary control, provides oversight, develops policy, and has authority over all functions and services provided by the TWIC QTL Program. The PMO Chief is responsible for the overall success of the TWIC QTL Program.

The PMO Chief is supported by both federal employees and contractors.

7.2 Qualifications and Training

PMO staff members need to demonstrate competence in the areas of smart cards, biometrics, PKI and access control and be thoroughly familiar with the TWIC specification and supporting documents.

All personnel supporting the PMO functions shall be knowledgeable of the TWIC QTL Program and its related processes such that they are capable of performing their responsibilities correctly and consistently. The PMO shall document how the supporting personnel have fulfilled qualification and training requirements.

7.3 Confidentiality

External organization personnel (e.g. contractors) who serve as experts are required to sign non-disclosure agreements to maintain confidentiality. TSA Federal employees are covered under the terms of federal employment and are not required to sign any additional documentation.

7.4 Data Access

Access to Applicant information is restricted to the PMO staff and to members that serve on the Special Review Committee (See Section 9.1).

7.5 Conflict of Interest

PMO staff participating in the Program shall:

- Prevent the existence of conflicting roles that might bias their judgment; and
- Prevent unfair competitive advantage.

In the event that such a conflict arises, the concerned PMO staff member shall notify the PMO Chief immediately and be requested to be relieved from a particular applicant case or the TWIC QTL Program in its entirety depending on the situation.

8 Complaints

8.1 Submitting a Complaint

The PMO encourages formal written correspondence signed by the complainant and addressed to the TWIC QTL Program.

8.2 Procedure for Dealing with Complaints

The PMO shall evaluate the correspondence to determine if it is a complaint that the TWIC QTL Program can and should address. Once identified as a complaint, the PMO shall enter the complaint in the Complaints Register, establish a new file and append the document to the file. All incoming and outgoing correspondence related to a complaint shall be logged in the Complaints Register.

After registration of a complaint, the PMO shall send an acknowledgement to the complainant.

The PMO shall analyze available information to determine the appropriate course of action. The TWIC QTL Program shall keep a record of the actions taken and review these actions for effectiveness, if appropriate. Once a conclusion is reached, the PMO shall inform the parties involved, if appropriate.

9 Appeals

In the event that the resolution to a complaint is not satisfactory to the complainant, the complainant may request an appeal. The request for appeal shall be in writing, signed and addressed to the TWIC QTL Program. The PMO will arrange for a Special Review Committee (SRC) to be set up to evaluate the appeal. The SRC, consisting of members that were not involved in the original decision, reviews the matter and makes a recommendation for resolution to the TWIC QTL Program.

The TWIC QTL Program reviews the SRC's recommendation and issues a final decision on the appeal. The complainant shall be notified of the final decision.

9.1 *Special Review Committee*

An SRC shall be comprised of at least three persons and have an odd number of participants who are considered by the PMO to be technical experts in the area under appeal and did not participate in making the initial decision. SRC members shall not have a conflict of interest in the appeal.

Each member shall be required to sign a statement indicating awareness of the standards of ethical conduct including of confidentiality and non-conflict of interest.

The SRC may request additional information and resources as needed from the PMO.

Appendix –A Flow Charts

A.1 TWIC QTL Listing Process

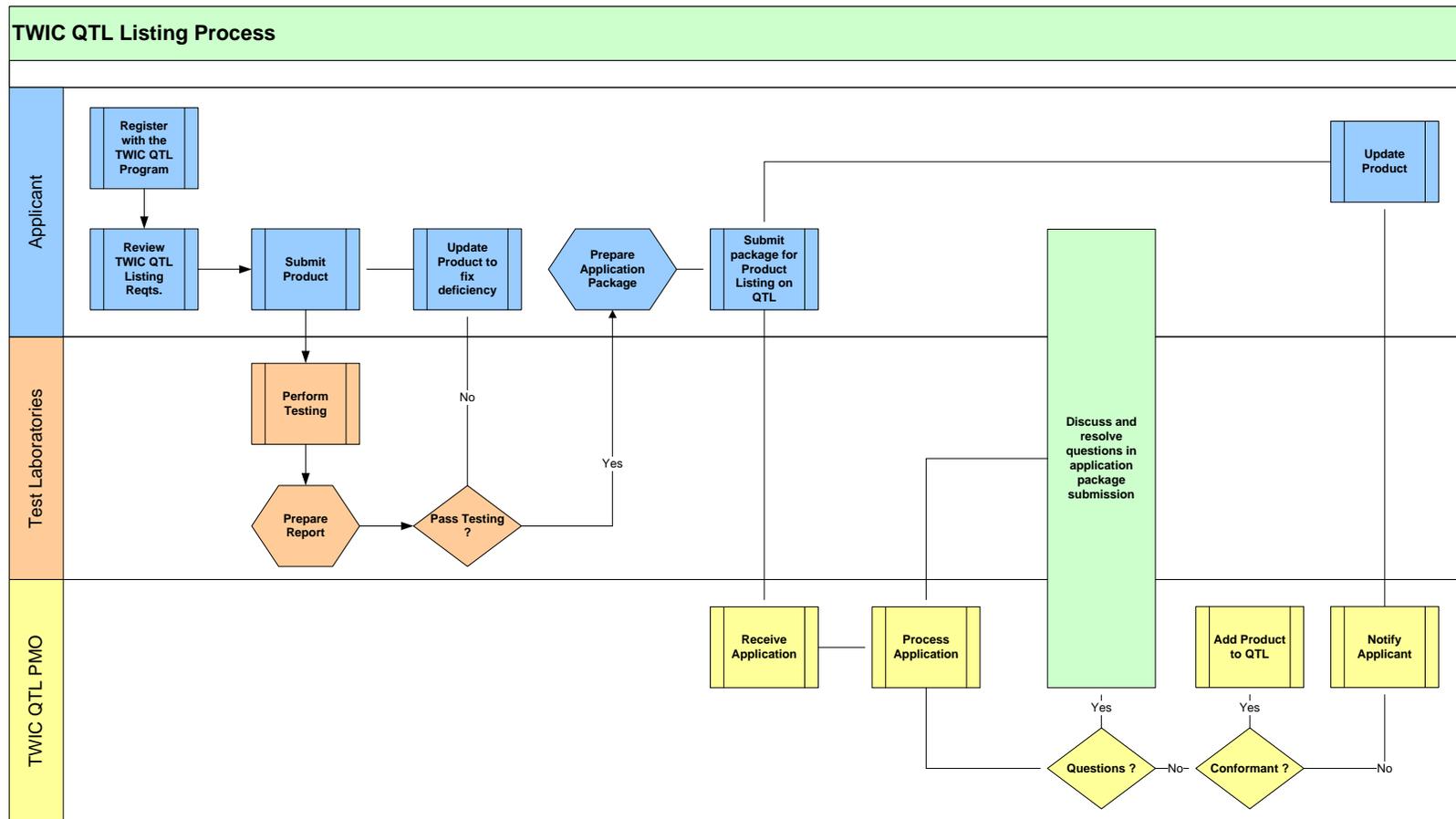


Figure 2 - TWIC QTL Listing Process

A.2 TWIC QTL Upgrade Listing Process

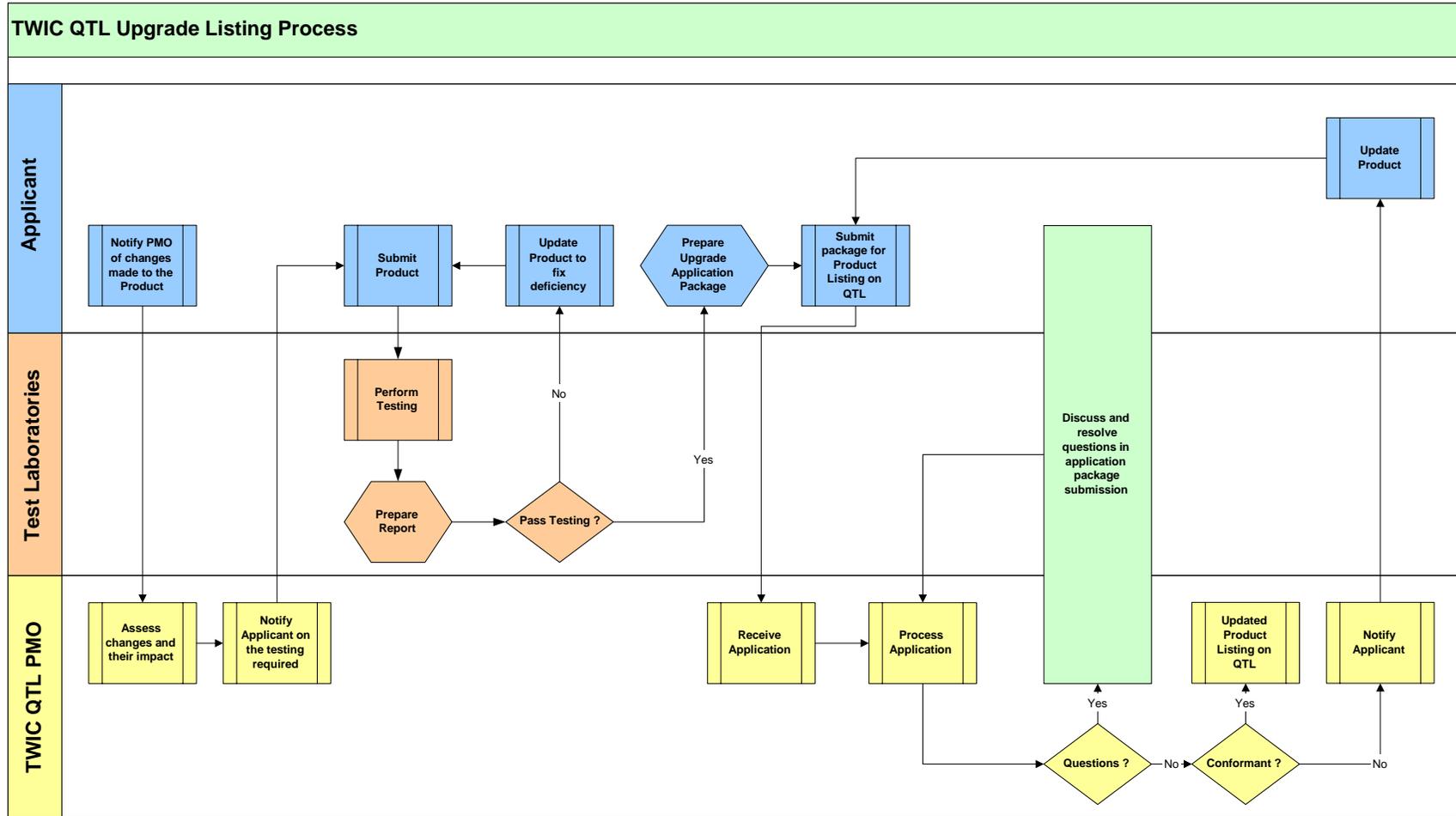


Figure 3 – TWIC QTL Upgrade Listing Process

A.3 TWIC QTL Suspension Process

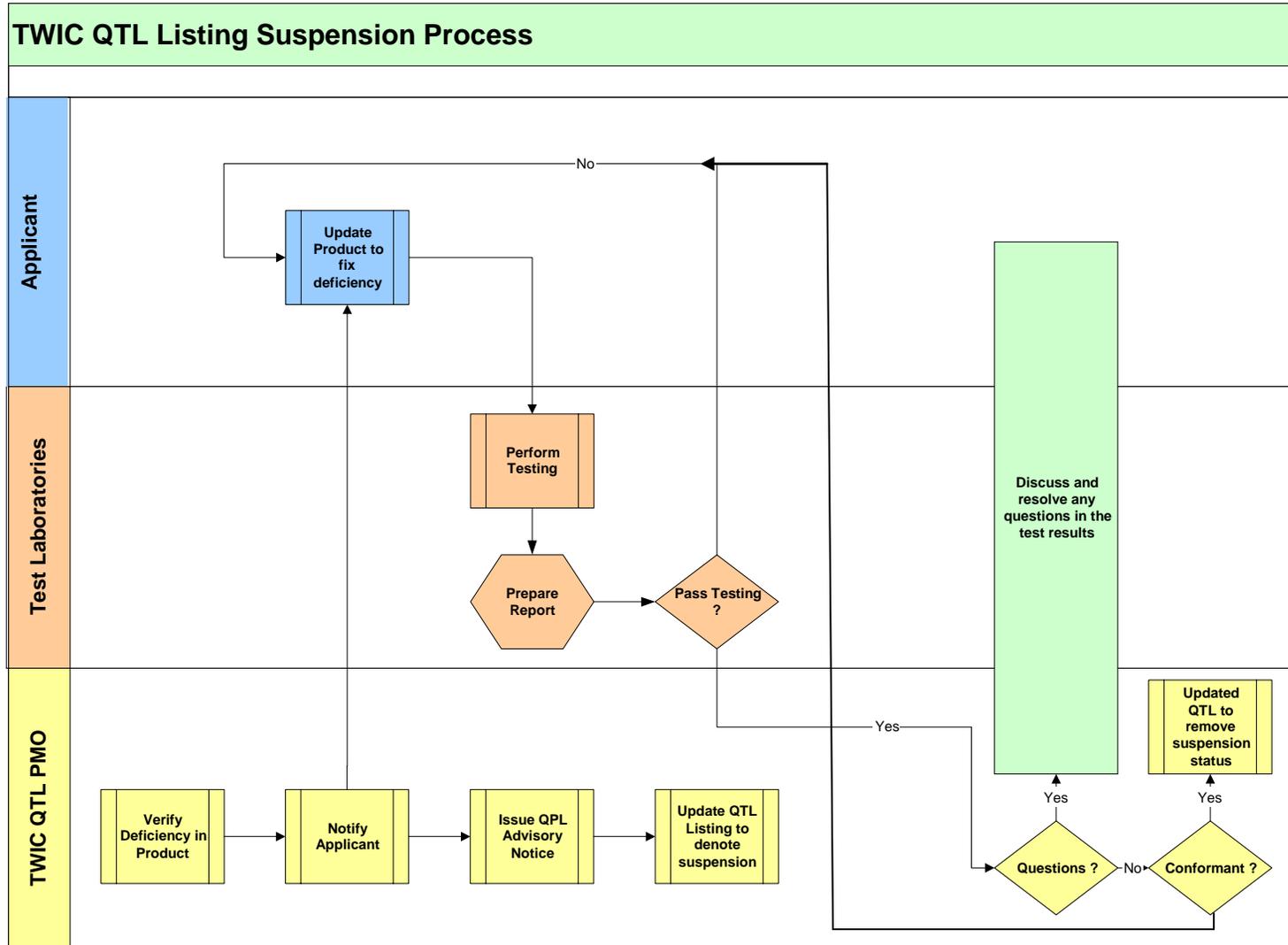


Figure 4 – TWIC QTL Suspension Process

Appendix B – Agreement and Forms

B.1 TWIC QTL Program Applicant Agreement

All Applicants seeking to participate in the Transportation Workers Identification Credential (TWIC) Qualified Technology List (QTL) Program must complete and sign this agreement. The original signed agreement must be submitted to the TWIC QTL Program Management Office (PMO) at 601 S. 12th Street, Arlington, VA 22202. On receipt of the completed agreement, the PMO will sign and return a copy to the applicant accepting their participation via e-mail.

Applicant Information

Please provide business headquarters information below.

Applicant Name: _____

Address: _____

Telephone: _____ Fax: _____

Approved Signatory:

Name: _____ Title: _____

Telephone: _____ E-mail: _____

Authorized Representative:

Name: _____ Title: _____

Telephone: _____ E-mail: _____

Agreement

By submitting this application, I/we, on behalf of _____,
Applicant
hereby acknowledge and agree to the following:

- 1** I/we will not use any model's QTL listing status in a way that, in the opinion of TSA:
 - 1.1** Is inconsistent with the TWIC product's listing status.
 - 1.2** Brings the credibility of DHS, TSA, or the TWIC QTL Program into question.
 - 1.3** Is misleading or inaccurate.
- 2** I/we agree, upon withdrawal, suspension or revocation of listing status to immediately cease and desist any and all advertising or statements claiming conformance of the affected product(s).
- 3** I/we will use the listing status only in the manner for which it was issued and reference only the requirements of the specific standard to which the model was found to be compliant.
- 4** I/we will not create or otherwise publish in any form(written, electronic, or via internet) any document, advertisement, product literature or brochure that references TSA, TWIC or the TWIC QTL Program in a manner that is not consistent with this agreement.
- 5** I/we acknowledge that failure to comply with the provisions of this agreement immediately on such request by TSA constitutes grounds for suspension or revocation of product's listing status.
- 6** I/we agree to maintain a system of traceability between listed model designations, serial numbers, and the purchasers of each product.
- 7** I/we shall not assign this agreement in whole or in part to another party.
- 8** I/we hold PMO officials harmless and indemnify them from fees arising from any and all claims with respect to the applicant's listed products, to the TWIC QTL Program, to the TWIC QTL conformance statement and/or violation of the terms and conditions of this agreement.

Administrative Manual

- 9 I/we agree to notify PMO in writing on company letterhead if the authorized representative changes.

- 10 The TWIC QTL Program will maintain confidential all information obtained from the applicant and will not disclose such information to any third party without the prior written approval of the Applicant.

Authorized Representative:

As the Applicant's authorized representative, I have the authority to agree to all requirements of this document on the Applicant's behalf and attest that all statements are correct and made in good faith.

Signature of Authorized Representative

Date

TWIC QTL PMO Representative Acknowledgement:

Signature

Date

Name (Please print/type)

B.2 TWIC QTL Program Product Application

This application must be completed for each Applicant TWIC system component and submitted to the Transportation Worker Identification Credential (TWIC) Qualified Technology List (QTL) Program Management Office (PMO) at 601 S. 12th Street, Arlington, VA 22202. On receipt of the completed application, the PMO will issue a test identification number for this product via e-mail to the applicant.

Applicant Name: _____

Product: _____

Model: _____

Version: _____

Product Information

Reader Type: Fixed Portable

Reader Location: Indoor Outdoor

Authentication Mode: 1 2 3 4

Product Features Supported

- Real time Clock
- Magnetic Stripe Reader
- 48 bit Wiegand output
- Contact Interface

Declaration for TWIC Card Reader

It is required that the product designation under which this TWIC system component will be sold be identified below.

Product: _____

On behalf of _____, I/we agree to the following conditions
Applicant

and acknowledge that failure to comply with any of these terms may result in

the revocation of TWIC QTL listed status for the product in question:

1 General Terms of Maintaining Listing Status of the Product: If review of this declaration and any accompanying documentation by the TWIC QTL Program results in this product being found compliant with the requirements of the current version of the TWIC specification, the following are conditions for maintaining its listed status.

1.1The manufacture of all subsequent products shall be identical in all respects to the samples originally tested and found to comply with the current TWIC specification. Any changes or modifications as listed above to the construction details constitute a design change and therefore must be submitted as a new product. It is recognized that not all changes constitute a design change; however, any change to a model must be requested in writing to the TWIC QTL Program and approved by the PMO prior to making the change.

1.2Listed status of a model is granted and maintained at the discretion of the TWIC QTL Program. The decision as to whether or not to list a product on the TWIC QTL shall be made by the TWIC QTL Program on the basis of the information gathered during the conformity assessment process and any other relevant information. No party has a legal right to the listed status. The TWIC QTL Program grants or suspends listed status with the primary purpose of ensuring that maritime ports have the best information available about the functionality, reliability and safety of equipment tested under the TWIC QTL Program.

1.3Applicant compliance with all of the TWIC QTL Program requirements is mandatory.

2 Transition period between revisions to the TWIC Specification: Following the publication of revisions to the TWIC specifications, Applicants will be notified 60 days in advance of the end of the transition period (i.e. the effective date of the specification) after which the product will be listed on the QTL under the previous

Administrative Manual

specification version.

Authorized Representative:

As the applicant's authorized representative, I have the authority to agree to all requirements of this document on the applicant's behalf and attest that all statements are correct and made in good faith.

Signature of Authorized Representative

Date

TWIC QTL PMO Representative Acknowledgement:

Signature

Date

Name (Please print/type)

Administrative Manual

B.3 TWIC QTL Declaration

(For QTL staff, assessors, and technical experts)

This is to acknowledge that I understand my responsibilities as a representative of the Transportation Worker Identification Credential (TWIC) Qualified Technology List (QTL) Program in carrying out my duties.

I hereby commit myself to the following:

1. I agree to comply with the policies, procedures, and rules set forth by TWIC QTL Program while working for or on behalf of PMO.
2. I agree to maintain confidentiality of all information relating to product applications and conformity assessments. I will hold in strict confidence all information, proprietary or otherwise, obtained during the assessments of a product. I agree to maintain this confidentiality even after I am no longer working for or on behalf of TWIC QTL Program.
3. I understand that I may reveal information about product assessments only to PMO, or TWIC QTL special review committee.
4. I agree not to offer consultancies or services to third-party laboratories that might compromise my impartiality during any phase of the assessment or decision-making process.
5. For each assessment about which I obtain information, I agree to be free of any commercial or financial interests or other pressures or conflicts of interest that might cause me to act in other than an impartial or nondiscriminatory manner.
6. For each assessment about which I obtain information, I agree to keep the TWIC QTL Program informed, in a timely manner, of any activities, affiliations, or relationships that might compromise my adherence to commitments made in this declaration.

For employees of the Executive Branch of the U.S. Federal Government:

1. I am aware of the rules for employee responsibilities and conduct as set forth in The U.S. Code of Federal Regulations, 5 CFR Part 2635, Standards of Ethical Conduct for Employees of the Executive Branch.

Signature

Date

Administrative Manual

Name (Please print/type)

Appendix –C Bibliography

1. TSA, TWIC Reader Hardware and Card Application Specification, May 30, 2008.
2. Federal Information Processing Standard 201-1, Change Notice 1, Personal Identity Verification (PIV) of Federal Employees and Contractors, March 2006.
3. NIST Special Publication 800-73-2, Interfaces for Personal Identity Verification, Oct 2008.
4. NIST Special Publication 800-73-3, Interfaces for Personal Identity Verification, February 2010.
5. NIST Special Publication 800-76-1, Biometric Data Specification for Personal Identity Verification, January 2007.
6. NIST Special Publication 800-78-1, Cryptographic Algorithms and Key Sizes for Personal Identity Verification.
7. ISO/IEC Guide 65:1996, General requirements for bodies operating product certification systems.
8. ISO/IEC 17025:2005, General requirements for the competence of testing and calibration laboratories.
9. ISO/IEC 17020:1998, General criteria for the operation of various types of bodies performing inspection.
10. ISO/IEC 17000:2004(E), Conformity Assessment – Vocabulary and General Principles.