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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Equity Study on
Remote Identity Proofing

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General Comment

We encourage GSA to take due diligence in conducting the study to ensure equity and bias reduction for
characteristics such as various demographics, populations with older phones and low bandwidth, and
impaired individuals.
We encourage GSA to only select sources that can fully protect people's privacy.

We believe that GSA should use automated solutions that employs machine learning, computer vision,
and AI on the edge (i.e., on the device itself) during the capture/onboarding process. This greatly
outperforms human adjudication and enhances privacy, ensuring the fastest, most secure, and most
accurate process for the constituent while significantly reducing friction.