

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
1	GEIA (Jake Parrot and Charles Milligan)	Global	The business rules don't mention syntax. No syntax is proposed to distinguish whether UID Construct #1 or #2 applies to derive the UID. Also, there is no requirement for marking the entire UID on the item.	<p>Syntax and data qualifiers (semantics) are designated in the Unique Identification Guidance. Some data qualifiers (semantics) required to support the UID are still in the process of assignment. Need to fill in data qualifiers table in the UID Guide, especially for UID.</p> <p>The following data qualifiers are still in progress: AI for EAN.UCC Company Prefix and TEI for Original Part Number.</p> <p>The AI for UID is 8004, the TEI for UID is UID, and the DI is 25S (draft).</p> <p>The AI for EAN.UCC Company Prefix has been approved but no number has been assigned.</p> <p>Jim Petraghani will notify Max W. to update Guide when the code has been assigned.</p>	Open Work Item #3
2	GEIA (Jake Parrot)	Global	What are the contract terms that are going to be used to account for human errors in this effort?	Contract terms can be specified on a case-by-case basis. However, if industry would like to coordinate this issue and present a recommendation to DOD, the Council of Defense and Space Industry Associations (CODSIA) would be an appropriate forum to begin that process.	Closed as of 7-30-03
3	GEIA (William Ritter)	Global	This will eventually end up as increased cost of materials being sold to DOD.	DOD expects increased cost of materials to be a short-term cost increase until suppliers can efficiently incorporate UID into their internal processes. The long-term benefits to DOD are expected to far outweigh the short-term costs.	Closed as of 7-30-03
4	GEIA (Charles Milligan, IBM)	Global	Add a rule: If the item is marked with a UID, this will be used as the identifier. It is not permissible to derive the UID from the component elements if the full UID is available.	<p>This was accepted as an appropriate suggestion for capturing the UID from the item. However, the length of the UID may present problems for AIS data storage and transfer.</p> <p>Add a rule: If the item is marked with a UID, this will be used as the identifier. It is not permissible to derive the UID from the component elements if the full UID is available.</p> <p>Team needs to approve. The team did not agree that this was a necessary addition to the business rules. Dan Kimball worked with Charlie Milligan to determine the original intent of the rule and determined that this is not a business rule.</p>	Closed as of 11-13-03
5	GEIA (Alan Lager)	1	Require UID, not unique identification. Almost everything is pilferable and everything is life limited (has a shelf life or a service life). The way this was worded there is nothing in the inventory that would not require a UID. Not sure this is explicit enough: consumables do not have a serial number; they may have a batch number but that is applied to the container not the consumable. Also, many items usually are identified by specification or standard number, not part number, so how does the UID fit?	The policy gives discretion to the Program Manager to identify which items under \$5000 require a UID.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

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6	Lockheed Martin (Mitch Kaartela)	1	Industry is going to have a difficult time meeting this \$5,000 rule right away. Let's suggest that we start with a \$50,000 threshold for the first 3 years, and then transition to the \$5,000 threshold after that. This will give Industry some time to get used to the new paradigm.	Any difficulties contractors may have should be discussed with the Program Manager. Implementation modifications to the policy will most likely be made at the Program level.	Closed as of 7-30-03
7	GEIA (Charles Milligan, IBM)	1	This needs an exclusion for items that cannot be marked either because of size, characteristic, or damage to the item. A 1kg weight traceable to international standards, for example, may meet the criteria for marking but marking the item will essentially destroy its value.	This subject is addressed in MILSTD 130 and the UID rules would defer to that standard in this case.	Closed as of 7-30-03
8	DLA (Gene Bransfield)	1	It would seem that any equipment or reparable that is pilferable or sensitive shall be controlled, regardless of cost. Item managers have a tendency to change data pertaining to an item. I have seen instances of non-classified items being changed to classified.	The policy establishes that even items under the \$5000 threshold should be controlled if they meet certain criteria.	Closed as of 7-30-03
9	Lockheed Martin (Mitch Kaartela)	Old 2 New 1	This seems to imply that the UID is not required to be captured and tracked within the Contractor's internal databases. One of the largest costs to contractors for UID will be adding a 50-96 position UID field in their databases.	Refer to Business Rules 22 and 24 for clarification. UID is not required per se but contractors must be able to locate item records using the UID.	Closed as of 7-30-03
10	Navy (Matt Mullins)	Old 2 New 1	UID, when available, should be included as a discrete Component, data element. Further, ISO standards need to be updated to recognize an UID assignment. Also, package marking and invoices will require inclusion of UID marking data.	MIL STD 129 handles rules for marking containers and contents. The team agreed that a container over \$5000 in value would have a UID. The question of how to mark containers with content information was the main issue. This was determined to fall under the domain of MIL STD 129 (P), which will be updated to address UID issues. This item will remain open until the revisions to MIL STD 129 are drafted and approved. Dan Kimball to keep the UID team informed as to progress.	Open Work Item #2
11	GEIA (William Ritter)	3	This means that double marking will be required in many cases as some of the information is part of the current standard manufacturing processes. This will be added cost in tooling plus process cost.	The intention of UID is not to create double marking but to leverage markings already on the item to create a UID. Since the UID is non-parsable, if the UID is marked on the item, the component elements must also be marked on the item for practical purposes.	Closed as of 7-30-03
12	DLMSO (Mary Jane Johnson)	Old 4 New 3	These business rules specifically address marking the UID on an item and using an AIT device to create the UID from those marks. Isn't it possible that many marked items may be packed by a contractor, or DoD activity, in a larger container which will not always be opened upon receipt, and the UID	MIL STD 129 handles rules for marking containers and contents. The team agreed that a container over \$5000 in value would have a UID. The question of how to mark containers with content information was the main issue. This was determined to fall under the domain of MIL STD 129 (P),	Open Work Item #2

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

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			data will be required on the outside package labeling or other documentation, to be read by an AIT device to create the UID in the receiving process? There should be a rule for this.	which will be updated to address UID issues. This item will remain open until the revisions to MIL STD 129 are drafted and approved. Dan Kimball to keep the UID team informed as to progress.	
13	Navy (Matt Mullins)	Old 4 New 3	Haven't seen any mention that there will be a Data Qualifier (Data Identifier, Application Identifier, or Text Element Identifier) for the assigned UID when created.	The following data qualifiers are still in progress: AI for EAN.UCC Company Prefix, DI for UID, and potential legacy-only qualifiers for "CAGE of entity that serialized the item" and "Serial number not assigned by the manufacturer". The following data qualifiers are still in progress: AI for EAN.UCC Company Prefix and TEI for Original Part Number. The AI for UID is 8004, the TEI for UID is UID, and the DI is 25S (draft). The AI for EAN.UCC Company Prefix has been approved but no number has been assigned. Jim Petraghani will notify Max W. to update Guide when the code has been assigned.	Open Work Item #3
14	Navy (Matt Mullins)	5,6	ISO data qualifiers need to be assigned for IACs and/or enterprise identifiers.	Data qualifiers are not required for the IAC because the IAC is not a discrete data element in the machine-readable code.	Closed as of 7-30-03
15	GEIA (Chris Denham)	5	Can same enterprise use both constructs?	This is a business decision left to the enterprise. However, it is not appropriate to use both constructs on the same item.	Closed as of 7-30-03
16	GEIA (Charles Milligan, IBM) and DLA (Gene Bransfield)	5	Uniqueness is not guaranteed because, for example, two issuing agencies could issue identical enterprise codes to different enterprises. If these enterprises released the same serial number or part/serial number combination, they would have identical UIDs but represent different items.	Using the IAC as the prefix solves this problem. This presents another issue: what is the process or rule for addressing a duplicate UID when found? Since a central registry for UID will exist, the following rule was drafted and inserted as the third rule in the section "Capturing the Unique Identifier": Discovery of a duplicate UID will occur when the government attempts to register the UID in its internal database. If a true duplicate exists, the government will work with the appropriate enterprise(s) to resolve the duplication.	Closed as of 9-25-03
17	DLMSO (Ellen Hilert)	5	If the issuing agency code value is to be retained within the UID, there is a conflict with Rule 19, which states that qualifiers will not be part of the UID.	The IAC is not a data qualifier, it is a data element. The business rules have been updated to explicitly show the IAC as a data element.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
18	DLMSO (Mary Jane Johnson)	Old 6 New 5, 28	DLMSO believes the current construct is too limiting. Recommend employing MIL-STD-130 terminology to refer to the "Part or Identifying Number (PIN)" vice "part number." Rational: Standard marking procedures recognize a variance for types of materials and commercial practices in describing an item. Additionally, recommend "Traceability Code" be considered vice "serial number" to accommodate variances in how an item is uniquely identified. For example, a Vehicle Identification Number (VIN) cannot be accommodated under the current constructs. A VIN is neither a part number nor a serial number, yet it is the way the manufacturer uniquely identifies the item.	The group decided that for legacy items lot/batch number could be used in a variant to Construct #2, referred to as Construct #2A. For new items, the Guide applies. The group recommends communication with JOCG to verify how they serialize for item marking. A new work item will be created for Rob L. to communicate to JOCG. (Work Item #134) The TIWG will be notified of the new data element, and the Guide will be updated to reflect the variant to Construct #2.	Reopened and closed as of 11-13-03
19	QED (Craig Harmon)	Global	Remove reference to registration authority – just refer to IAC.	All references to Registration Authorities has been removed from the next version of the business rules	Closed as of 7-30-03
20	QED (Craig Harmon)	Old 7 New 6	There is no way for software to derive a UID for enterprises that use CAGE codes or for health care items (assuming because the codes do not currently exist) in accordance with the interim solution.	The paperwork is complete and has been submitted. The application is under appeal currently because 3 NATO countries do not use the CAGE/NCAGE code, which violates a requirement for approval. The appeal should be decided by October 1. This item will remain open until the IAC is approved for CAGE and DODAAC. There are currently no EIDs for healthcare, thus we cannot get an IAC at this time. Dan Kimball will identify the code by the end of November for interim use and notify the UID team.	Open Work Item #6
21	GEIA (William Ritter)	Old 8, New 7	Does this force small suppliers to purchase this standard or will the Government provide it at no cost to them?	The Unique Identification Guidance published on August 1, 2003 has a paragraph explaining the IAC and listing the different options on Page 5.	Closed as of 7-30-03
22	DLMSO (Ellen Hilert)	Old 8, New 7	Registration authority has many applications in the AIS area, reword this to be more specific.	All references to Registration Authorities has been removed from the next version of the business rules.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
23	GEIA (Charles Milligan, IBM)	Old 10, New 9	Business rule 10 is in conflict with UID Construct #2 because of potential configuration changes.	Original Part Number is required for UID Construct #2. As a result, when the part number changes, the UID will not change because the Original Part Number stays the same.	Closed as of 7-30-03
24	GEIA (Alan Lager)	Old 10, New 9	Delete, unnecessary.	This rule was deemed important. It has been reworded to clarify the intent.	Closed as of 7-30-03
25	GEIA (Charles Milligan, IBM)	Old 11, New 10	Clarify that the part number unique within an enterprise does not require a change to the semantics of part number assignment.	Withdrawn after clarification of intent.	Closed as of 7-30-03
26	Navy (Matt Mullins)	Old 11, New 10	Note the Original Part Number is used in this item. In Item 10, reference to having the flexibility to change part number is used. Once an UID is assigned, change should not occur and item is identified for its entire life.	Withdrawn after clarification of intent.	Closed as of 7-30-03
27	Navy (Matt Mullins)	Old 12, New 11	Add "for construct 2"	It was determined by the group that this was better left wide in scope to avoid unintended results.	Closed as of 7-30-03
28	Navy (Matt Mullins)	Old 13, New 12	Item #10 above provides capability for change to Part Number. Item # 13 indicates no change may occur. Can't be both.	Withdrawn after clarification of intent (contact Dan Kimball if additional clarification if required.)	Closed as of 7-30-03
29	Lockheed Martin (Mitch Kaarlela)	Old 14, New 13	Can we specify the enterprise identifier used to construct the UID is the manufacturing authority (MA)? Also, can this rule state that the enterprise identifier of the MA shall be the official (rather than only) enterprise identifier marked on an item. Many legacy programs have both the Design Authority's CAGE Code and MA CAGE Code shown on the nameplate. UID ought to clarify and state that MA is the Enterprise ID to which this is referring. Requiring only one Enterprise ID on a nameplate will be a scope change to some programs.	There are two issues here: A) how to clarify the current rule where the intention was to stop an enterprise with a CAGE, DUNS, and EAN.UCC number from marking all three on the item and B) how to address the valid but multiple enterprise identifiers that may be marked and should not be removed from the item. Somehow the enterprise identifier that is required to construct the UID will need to be indicated or be universally identifiable. New rule wording clarifies the intent.	Closed as of 7-30-03
30	GEIA (Charles Milligan, IBM)	Old 14, New 13	The term 'marked' needs to be clarified as only applying to the bar codes/symbols on the product if that is intended. One interpretation is that logos and other text displays of the enterprise ID are prohibited.	New rule wording clarifies the intent.	Closed as of 7-30-03
31	GEIA (Alan Lager)	Old 14, New 13	Delete, This is not only impractical, it has legal liability consequences, e.g., can't tell who is liable for design defects.	This rule will most likely be maintained to clarify the request.	Closed as of 7-30-03
32	QED (Craig Harmon)	Old 16, New 15	MIL STD does not define TEIs as part of ECC 200, only linear.	Withdrawn after clarification of the intent of the recent MILSTD revision.	Closed as of 7-30-03
33	Lockheed Martin (Mitch Kaarlela)	Old 16, New 15	The material chosen for the nameplate or label or mark, must be as durable as the item to which it attaches. Some parts can have sticker labels, some metallic sticker labels, some metal nameplates and some direct marking via dot peen or laser etch.	This rule has been reworded to specify the intent.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

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34	Lockheed Martin (Mitch Kaarlela)	Old 16, New 15	Making a drastic declaration to go immediately to 2D barcode technology could impact many programs. We should suggest a transition from 1D minimum towards 2D minimum in three years. If so, the wording of this rule should change to include: 1D Code 39 or Code 128.	According to the July policy memo, UID applies to new solicitations after January 2004 and will be applicable to contract modifications. Under this explanation, the contractor may choose to charge for any impacts to cost or negotiate an implementation schedule to lower cost.	Closed as of 7-30-03
35	GEIA (Charles Milligan, IBM)	Old 16, New 15	Extend to assert that the UID mark is not easily transferable, for example a label that can be peeled off and reapplied to another item.	This rule has been reworded to accept this recommendation.	Closed as of 7-30-03
36	Navy (Matt Mullins)	Old 16, New 15	Data Matrix ECC200 Symbol requires "Image Scanners" and does not have enough flexibility. Also, Data Matrix ECC200 is limited to 75-80 data elements. Suggest all markings be done in High Density 2D for greater flexibility.	Withdrawn after clarification of intent (contact Dan Kimball if additional clarification if required.)	Closed as of 7-30-03
37	Navy (Matt Mullins)	Old 17, New 16	It is still important to have information in Human Readable Format. Compliance w/ MILSTD 130 needs to be met.	The UID business rules are in compliance with MILSTD 130. Human readable information can be included on the mark, as long as it is in addition to the Data Matrix.	Closed as of 7-30-03
38	QED (Craig Harmon)	19	Change the maximum length to 50 characters, especially since the fields are not supposed to be parsed.	Changed to 50 characters.	Closed as of 7-30-03
39	QED (Craig Harmon)	19	The maximum length of an enterprise identifier only needs to be 9 because the DUNS number is only 9 characters.	The DUNS number can go to 13 characters.	Closed as of 7-30-03
40	GEIA (Charles Milligan, IBM)	19	Expand to assert the specific character set that is acceptable. For enterprises that produce products labeled in the alphabet of the producing country, will they be required to provide an "English" representation in the UID? Note that NATO will eventually have members that use different alphabets. Lastly, is the "character" intended to be represented by 6-8 binary bits vs. Unicode or DBCS, which may need 2-3 bytes to represent one character?	The UID is assumed acceptable to the UN via EAN.UCC since EAN.UCC participated in UID working groups. Once Dan Kimball briefs NATO in October 2003, he will open a new work item if issues arise.	Closed as of 9-5-03
41	GEIA (Charles Milligan, IBM)	19	Business rule 19 is not consistent with the 6/8/03 draft of ISO/IEC 15459-3. ISO/IEC 15459 requires that the UID consist only of uppercase letters and numbers from ISO 646 and all other characters are removed as part of forming the UID. In addition, it limits the UID to 50 characters whereas Business Rule 19 permits lengths to 96. Since both 15459-3 and the DOD UID rules are still in draft (and with significant overlap in participation by the community), I see no reason for differences and can only hope that these are rationalized before final publication.	Clarified to more closely comply with ISO 15459.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

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42	GEIA (Charles Milligan, IBM) and Navy (Matt Mullins)	19	Business rule 19 asserts a maximum length of 96 but the three component fields have a sum of maximum lengths of 77. If this is intentional, the rationale for requiring 96 (presumably for systems design or compatibility with other item identification schema) vs. 77 should be articulated.	This rule has been reworded to specify the intent.	Closed as of 7-30-03
43	GEIA (Charles Milligan, IBM)	19	Business rule 19 asserts that the UID does not include the issuing agency code (IAC). Business rules 5/6 asserts that the UID will include the IAC, but the IAC is derivable from the data qualifier. However, this information is thrown away when the data is separated from the DI as the IAC assigned to DUNS by the RA is not formalized in the UID. It appears that 15459-3 addresses this by asserting that their UID starts with the IAC.	This rule has been reworded to specify the intent.	Closed as of 7-30-03
44	DLMSO (Ellen Hilert)	19	The primary Department-sanctioned commercial standard for transaction exchange is ANSI ASC X12 and it does not accommodate a reference number longer than 50 bytes. The most logical way to support communication of the UID is to employ the concept of a "virtual" UID which can be generated as needed. To accomplish this, the individual component pieces must retain their identity while preserving the relationship. This can be done through data qualifiers (semantics) in a manner similar to those used in an AIT environment. The intelligence represented by the qualifiers should be perpetuated from the transactional input (e.g. WAWF) or from the AIT devise, and would be maintained within the AIS. Recommend provisions for use of the "virtual" UID be incorporated.	This rule has been reworded to specify the intent.	Closed as of 7-30-03
45	DLMSO (Mary Jane Johnson)	19	DLMS ANSI ASC X12 transactions do not have the capability to transmit a 96 position field as is now required for the UID. Each of the UID data elements can, however, be passed individually in DLMS transaction exchanges. Additionally, there are systems that currently track items by enterprise ID (CAGE), part number, serial number as separate data elements. Recommend consideration be given to including the qualifiers for the individual data elements in the UID, so that they can be passed as Enterprise ID; Part Number; Serial Number in transaction exchanges.	This rule has been reworded to specify the intent.	Closed as of 7-30-03
46	GEIA (Charles Milligan, IBM)	21	What happens when one of these fields contains a symbol that is not normally representable in the "English" character set? Again, note that ISO/IEC 15459-3 has a different methodology for handling special characters, which should be rationalized.	Acceptable symbols and special characters are included in Rule 19.	Closed as of 7-30-03
47	Lockheed Martin	22	Add: Utilization of the UID is primarily an internal-US DOD	DOD needs to be able to communicate with its contractors	Closed as of

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

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	(Mitch Kaarlela)		initiative. Potentially, the single largest cost associated with UID would be the creation of a new 96 max character field Contractor databases. The better solution is to declare that DOD is the primary user of UID and Contractors are not required to add the UID field in internal databases, nor to re-integrate the databases. Also rewrite sentence to read: For activities after initial delivery in support of the product life cycle, any US Gov't entity that collects data about the item must be capable of associating the data with the UID in accordance with program requirements to capture or integrate UID within their internal databases. Repair and maintenance actions done by OEMs will be keyed to the existing component data elements already used for these purposes.	using a common key for information exchange and tracking. That common key has been determined to be the UID. As long as contractors can comply with the current UID rules and policy guidelines, the specific implementation of UID by each contractor is left to the contractor's discretion.	7-30-03
48	GEIA (Jake Parrot)	Old 23, New 25	Non-parsable means that the component parts of the UID have to be tracked everywhere. It also means that the UID field itself is meaningless except as a single-field primary key in a database.	No change required	Closed as of 7-30-03
49	Lockheed Martin (Mitch Kaarlela)	Old 23, New 25	Change reference to databases to US government databases. Change discrete data element to separate field.	See the response to #47.	Closed as of 7-30-03
50	GEIA (William Ritter) and Navy (Matt Mullins)	Old 23, New 25	Where will the funding come from to update the databases? Individual item will be required to be stowed, shipped, inducted into maintenance actions, packages marked, invoices marked, etc. by UID. A sampling of 35 part numbers installed in aircraft to individual CAGE, Part Number and Serial Number identification went to 11,000 items. This is a huge growth to identify individual items.	Funding is undetermined at this time.	Closed as of 7-30-03
51	GEIA (Charles Milligan, IBM)	Old 25, New 27	Do all agencies concur with the practice of not reissuing the UID? ISO/IEC 15459-3 allows for reuse of UIDs. There is no compelling reason to permit reuse.	No change required	Closed as of 7-30-03
52	GEIA (Alan Lager)	Old 27, New 28	For the second bullet, why not use the current part number?	This rule has been reworded to specify the intent.	Closed as of 7-30-03
53	GEIA (Alan Lager)	Old 27, New 28	For the third bullet, there is no way to assure that with existing inventory. Serial numbers were assigned against a non-changing identifier that may be a Configuration Item identifier, a Model Number or a Base Drawing Number (multi-detail drawings), so you can't guarantee uniqueness within the part number. Also there are very many examples in the inventory of poorly serialized items so once again you can't guarantee that there won't be two items with the same part and serial number.	This rule has been reworded to specify the intent.	Closed as of 7-30-03
54	GEIA (Jake Parrot)	Old 27, New 28	There needs to be a response to the issue of primes marking for subs (i.e., the long term use of the mark). What if primes	The contractual provisions rule UID marking of items. As long as the contract is in force, its provisions have to be met.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

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			go out of business, change org structure, etc?		
55	Navy (Matt Mullins)	Old 27, New 28	Restriction of assigning Enterprise Identifier and Serial Number should be responsibility of Repair activity when item is repairable. For items that do not get repaired, originating activities of assignment of UID will be required to maintain a log/file for assignment of numbers. For example, a ship/squadron could conceivably obtain a UID asset without Enterprise Identifier and serial number with only part number. In this case, that ship/squadron could assign Enterprise ID and serial number more than once if log/file not maintained.	This rule (26) will be reworded for the second bullet to read: If the part number is missing or cannot be determined, obtain a part number from the in-service engineer or other appropriate authority.	Closed as of 9-5-03
56	Navy (Matt Mullins)	Old 27, New 29	Too vague. Be more specific. List items such as Lot, Batch, date of manufacturer for use in identifying.	This has been reworded to clarify intent. It now specifically mentions lot and batch.	Closed as of 9-5-03
57	DLMSO (Mary Jane Johnson)	Old 27, New 29	If other data elements (such as lot or batch number) are needed to obtain uniqueness, neither construct #1 nor construct #2 will apply. Revise construct #2 to reflect the use of a "traceability number".	<p>The intent of this rule was to allow for PM discretion in how to create uniqueness. This concern will be addressed more explicitly in the Unique Identification Guidance.</p> <p>The group decided that for legacy items lot/batch number could be used in a variant to Construct #2, referred to as Construct #2A. For new items, the Guide applies. The group recommends communication with JOCG to verify how they serialize for item marking.</p> <p>A new work item will be created for Rob L. to communicate to JOCG. (Work Item #134)</p> <p>The TIWG will be notified of the new data element, and the Guide will be updated to reflect the variant to Construct #2.</p>	Closed as of 9-25-03
58	GEIA (Alan Lager)	Old 27, New 29	Which PM, government or contractor? Is this the right level of involvement?	This rule has been reworded to specify that the program manager is the government program manager. This was determined to be the right level of involvement for the business rules, allowing for appropriate delegation in the field.	Closed as of 7-30-03
59	Brown and Company (Frank Losey)	Global	Shipbuilders may find themselves in an awkward position on paint. Paint is a product that does not lend itself to a permanently affixed UID. However, because of the dollar value and the mission essential criticality of paint, I believe that paint would meet the criteria test for a UID. Thousands of gallons of paint are applied to the hulls of ships in order to protect them from the corrosive elements of the sea, and to increase speed and reduce fuel consumption. How will this paint be tracked? Paint containers are discarded or otherwise disposed after they become empty. Would empty paint containers have to be stored for 30-50 years? Etch a paint number on the painted hull of each ship? But this would	Paint is a consumable that gets "consumed" when it is applied to a surface. While it is in a container, paint may have a UID if unique identification is required for tracking purposes. In the case of paint being applied to a ship, the ship's configuration and/or maintenance records maintains a permanent record of the date, quantity and type of paint applied. Since the paint adheres to the ship's surface, it is assumed you can "find" the paint if you can find the ship. So unique identification marking of the actual paint on the ship's surface would serve no purpose.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

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			violate the integrity of the paint. How will one keep track of which coat of paint is used?		
60	G-4 (Ben Morgan)	Global	The business rules need to be integrated into the UID guide.	Done	Closed as of 7-30-03
61	G-4 (Ben Morgan)	Global	There is no stated exit strategy in the event of technological, legal, financial, or other difficulties.	This item specifically refers to what happens to the interim UID marking solution (i.e., the "DD" format code) when ISO/IEC JTC 1 SC 31 makes its final resolution. It was decided that some language needed to be developed to clarify how this will be handled in either scenario (i.e., SC 31 either accepts or rejects DOD's proposal.) Dan and Frank agreed to open a new work item to develop this language.	Closed as of 9-5-03, see Open Work Item #54
62	G-4 (Ben Morgan)	Global	The impact of UID on the performance of automated information system has not been evaluated – even on a prototypical basis.	Clarify question. Determine that scope is outside of the Business Rules Team. Forward to the Infrastructure Team.	Forwarded to TIWG as of 9-5-03
63	G-4 (Ben Morgan)	Global	The financial impact of UID on Enterprise Resource Planning initiatives and legacy systems within the military services and private industry is undetermined.	The appropriate team for ERP coordination is the Technical Interface Working Group (TIWG). If anyone is aware of points of contact for ongoing ERP efforts, please have them contact Bruce Probert (bruce.probert@saalt.army.mil) and Nat Bongiovanni (nat_bongiovanni@keane.com).	Forwarded to TIWG as of 9-5-03
64	G-4 (Ben Morgan)	Global	The UID construct has been assigned an upward limit of 96 characters. This is almost twice the number of characters permitted under XML, DLIS and DLMSO standards. Further investigation is required as to whether the UID construct is workable within existing applications.	This rule has been reworded to specify the intent.	Closed as of 7-30-03
65	G-4 (Ben Morgan)	Global	Business rules associated with certain classes of material, e.g., special weapons, SUBSAFE/LEVEL I, may not currently permit the use of UID marks.	MIL-STD-130 is the appropriate source for addressing this concern as it relates to UID requirements.	Closed as of 9-5-03
66	G-4 (Ben Morgan)	Global	There will be more than one way to apply a UID mark. Engineers must decide what type of mark to use for UID purposes and where that mark should be applied. These are "hidden costs" of UID and they may be substantial.	There are two components to this question. For the engineering component, MIL-STD-130 is the appropriate source for addressing this concern as it relates to UID requirements. For the cost component, this will be forwarded to the Policy team for review.	Forwarded to Policy team as of 9-5-03
67	Navy (Janet McClay)	Global	Policy documents state the output from the AIT reader should be the UID without data qualifiers, coding or other overhead. Also policy states the UID should not be parsed or reconstructed once the marking is decoded. If this is true, what benefit does applying ISO data qualifiers, data identifiers and ISO like standards to the data? All the effort cost and expense is avoidable by marking the item with its UID only.	The syntax and semantics coding serves the purpose of enabling the reader to identify data elements and determine if data elements are contained in their entirety or if some had "rubbed" off. Also, keeping the data separate on the item and using qualifiers to tell the reader how to concatenate the UID, rather than mandating a UID mark, enables suppliers to modify less of their current marking process. Most suppliers	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
			The result is the same, a unique ID being fed to the AIS.	already mark items with enterprise ID, part number and serial number.	
68	NAVSEA (Catherine Casper)	Global	Who is responsible for creating the UID for legacy equipment? Is it possible that database owners will create the UID? How can we be assured of global uniqueness?	Even though it may be possible to create a UID from data elements in a database, the UID data elements must be marked on the item in order for the UID to be created. For legacy items, if the UID data elements are not marked on the item, the data elements will need to be marked by a designated authority. Because the current UID policy does not apply to legacy items, there is no explicit requirement for marking legacy items at this time. However, the services are strongly encouraged to begin marking legacy items according to the UID policy as soon as possible.	Closed as of 9-5-03
69	NAVSEA (Catherine Casper)	Global	Will there be a central database where UID is stored and can be accessed by other databases?	This effort is currently underway but in its very early stages. The group discussing initial business rules for a UID registry database is the Technical Interface Working Group (TIWG). Points of contact for the TIWG are Bruce Probert (bruce.probert@saalt.army.mil) and Nat Bongiovanni (nat_bongiovanni@keane.com).	Forwarded to TIWG as of 9-5-03
70	AIA (Pat Jacklets, NGC)	1	Include an exception for contract provisions (i.e., statements of work) that do not require the UID. For example: "Unique identification is required for an item if it meets the DOD criteria as required in the statement of work. Contractors will still be able to use their temporary serialized ownership tags for management of property in conjunction with UID."	See Disposition # 101	Closed as of 7-30-03
71	AIA (Pat Jacklets, NGC)	5	Add a note: "UID on items is not the determining factor as to whether or not those items will be managed or accounted for"	The decision tree in Figure 1 (page 2) of the Unique Identification Guidance the determining factor for what items are required to be accounted for. Programs always have the discretion to account for more than what is required.	Closed as of 7-30-03
72	Navy (Janet McClay)	6	Should read "If the enterprise serializes within part number.	Done – changed wording.	Closed as of 7-30-03
73	Navy (Janet McClay)	6	One of the values of using data qualifiers is the elimination of knowing what the specific order, size or placement of data within the AIT media. Placing the constraint of maintaining data element order adds to the programming efforts for creating and using data qualifiers and semantics.	Data element order is only for concatenation of the UID, not for part marking.	Closed as of 7-30-03
74	Navy (Janet McClay)	7	Conflicts with Rule 3. Registration authority (issuing agency code) is a component data element of the UID. Rule 3 calls for marking the item with component data elements, Rule 7 does not require the registration agency.	This rule has been changed to remove the ambiguity.	Closed as of 7-30-03
75	Navy (Janet McClay)	Old 10, New 9	Both of the Construct makes do not involve part number changes. The means for accommodating CM changes is	Noted and agreed, no change required.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
			outside the UID domain.		
76	AIA (Pat Jacklets, NGC)	Old 11, New 10	Delete the words "for ensuring"	The intent is that the enterprise ensures uniqueness.	Closed as of 7-30-03
77	AIA (Pat Jacklets, NGC)	Old 12, New 11	Delete the words "for ensuring"	The intent is that the enterprise ensures uniqueness.	Closed as of 7-30-03
78	Army (Kathy Biddlecomb)	Old 14, New 13	<p>Current enterprise activities may remove the source identifier and replace it with their own Unique Enterprise Identifier or place a second UID or serial number on the item as it is resold to service or placed in an assembly.</p> <p>Verification of the Unique Enterprise Identifier and serial number in sensitive processes should be mandatory. Provisions to stop payment and reject mis-marked parts should be included in contract language. Establishment of "parent-child" lineage is required to maintain process integrity.</p> <p>Allowing the prime or "assembler" of all the parts to remark, remove original marking or simply be the only marking activity is not acceptable unless they are willing to accept legal responsibility. Our TAMMS-A process establishes a source document for each tracked item and uses a relationship to link items. A bearing might be tracked and placed in an assembly. The assembly would have its own unique identification mark, and record of all the tracked parts inside of it. The assembly can be tracked inside of a module, the module tracked to an engine, which is mounted on an aircraft. This parent-child relationship can exist to 5 levels. Although many manufacturers maintain their own registry process, company mergers / buy-outs and subsequent software and process changes can lead to generation of duplicate serial numbers.</p>	<p>The Army current requires:</p> <ol style="list-style-type: none"> 1. Prime contractors to "flow-down" marking and reporting requirements in their contractual documents to any-sub making items that have to be marked. 2. All contractors to provide "proposed marking" (today's serial number, part-number and cage code) to the Army serial number registry (for aviation items - AMCOM's TAMMS-A process) to ensure we do not have duplicate serial numbers. When requested the Army will generate identification numbers. <p>This process links the unique marking, contract and acceptance process.</p> <p>Resolution: This item was closed after discussion. It was determined that how to use the UID to track and relate items was an issue for the services to decide based on the needs and requirements of their programs.</p>	Closed as of 7-30-03
79	AIA (Pat Jacklets, NGC)	Old 14, New 13	Add a note: "This does not include the removal of trademarks"	This rule has been reworded to specify the intent.	Closed as of 7-30-03
80	Navy (Janet McClay)	Old 15, New 14	Previous uses using data syntax and semantics showed gaps in assigning international standards to DoD specific data elements. The resolution has been to use the "free-test" formats to fill the gaps. The policy document recognizes Formats 05 and 06. Is Format 07 (not discussed) permitted under Rule 15?	No. Acceptable formats are outlined in the UID Policy memo and Guidance documents. Format 07 is not permitted for UID or UID component data elements under rule 15. Note that format 07 is permitted in the mark, just not the UID portion.	Closed as of 7-30-03
81	Navy (Janet McClay)	Old 16, New 15	Requires double marking for instances where Data Matrix ECC200 does not meet the marking requirements for UID and program specific elements. Suggest using Data Matrix to the maximum extent possible with PDF417 as acceptable alternate.	This rule applies to new solicitations, not legacy programs, where program requirements will be determined by a new contract, using this rule.	Closed as of 9-25-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
82	UCC (Jim Petraghani)	Old 16, New 15	What about the legacy systems that are using linear and other symbologies? The policy and business rules should support multiple symbologies. Proposed rewording: The UID or the UID component data elements, at a minimum, should be contained in a Data Matrix ECC200 symbol. Data may be contained in other AIT media (e.g., contact memory buttons, linear bar codes, radio frequency identification tags , etc.) in addition to instead of the Data Matrix symbol . The physical data carriers that contain the UID, or the UID-required elements, shall remain readable and non-transferable until the item is destroyed.	Rationale: For direct part marking, the Data Matrix symbol provides an adequate solution for automatic identification of the item marked. The UID policy encompasses a much broader range of identifying an item. The installed base of equipment for marking, reading and verifying matrix symbols is very small (3 to 5 percent?) relative to the installed base of equipment for marking, reading and verifying linear symbols. The current auto id technology infrastructure predominantly supports marking and reading of linear bar code symbols. Requiring suppliers to mark, read and verify a matrix symbology would unnecessarily add cost to systems that are currently identifying items with other machine readable technologies. International standards for automatic identification technology relating to matrix symbologies are not yet published. In particular, conformance standards will not be published until sometime in 2004. Conformance standards for matrix symbologies include those for print quality, scanner performance and verifier conformance. This objection was withdrawn.	Closed as of 9-25-03
83	Air Force (Roger Saucedo)	Old 17, New 16	After "Where space is available" add, "and approved by the engineering function".	The group recommended not adding the additional wording because it is not necessary. The team will seek Roger's approval to close the item.	Closed as of 9-22-03
84	Air Force (Roger Saucedo)	Old 17, New 16	Additional marking may impact form, fit, and function thereby creating the need for a Class 1 Engineering Change Proposal. What this literally means is that the part number will roll.	Agreed. However, rolling part numbers do not impact UID. See Dan Kimball for further explanation.	Closed as of 7-30-03
85	Navy (Janet McClay)	19	If you add all the maximum field lengths together, it totals 77. What are the remaining 19 characters for?	This rule has been reworded to specify the intent.	Closed as of 7-30-03
86	AIA (Pat Jacklets, NGC)	19	Thought this was to increase from 96.	This rule has been reworded to specify the intent.	Closed as of 7-30-03
87	Army (Kathy Biddlecomb)	22	All activities, contracting acceptance, supply, transportation warehouse, maintenance and field installation/use must have capability to link cost and cycle time to the serialized component. 1. Suggest review of existing capability. 2. Registry linking contract and serial numbers must remain at the procuring activity so stop payment actions can be pursued for non-compliance.	This suggestion will most likely fall under the scope of the Infrastructure team.	Closed as of 7-30-03
88	Air Force (Roger Saucedo)	Old 24, 26 New 25	Where will this data be stored? EDW? Are we creating an additional database? If so, will this create a system? If so, who will take responsibility for Portfolio Management?	This effort is currently underway but in its very early stages. The group discussing initial business rules for a UID registry database is the Technical Interface Working Group (TIWG). Points of contact for the TIWG are Bruce Probert	Forwarded to TIWG as of 9-5-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
				(bruce.proper@saalt.army.mil) and Nat Bongiovanni (nat_bongiovanni@keane.com).	
89	Navy (Janet McClay)	Old 27, New 28	Which Construct is used?	Item #26 has been deleted, so either Construct can be used.	Closed as of 7-30-03
90	Air Force (Roger Saucedo)	Old 27, New 28	First bullet: Disagree, CAGE codes identify the entity that produced the item. CAGE codes play a significant role in our warranty and maintenance programs and are part of our configuration management process.	I think the intent of #27 is that the entity that produced the item is unknown.	Closed as of 7-30-03
91	Air Force (Roger Saucedo)	Old 27, New 28	Second bullet: The part must be destroyed or retired if the part number is missing. Only the OEM can issue part numbers. No new part number can be assigned without CCB approval with a resultant Class 1 ECP.		Closed as of 9-22-03
92	Air Force (Roger Saucedo)	Old 27, New 28	Third bullet: Does this recommendation take into account that any one entity authorized to uniquely mark a component must be assigned a set of serial numbers by a designated organization to preclude and prevent duplication of serial numbers? Authorized entities may include the depots, contractors and/or specific field activities.	The rule simply states where the reassignment would occur, not how uniqueness would be guaranteed. This may be an issue for the UID Guidance.	Closed as of 9-22-03
93	Navy (Janet McClay)	Old 28, New 29	In the event a Program Manager elects to add data elements for uniqueness, what vehicles are used to publish this fact to allow programming the AIT reader to extract the UID?	The same semantics will be used to identify the elements to the reader, so no additional programming of the reader should be required.	Closed as of 7-30-03
94	Air Force (Roger Saucedo)	Global	Second bullet: What recommendations will be provided for those items that have already been delivered under the same contract but were not marked b/c marking was not in effect?	This should not be a problem if the deadline for compliance is all new solicitations by January 2004. However, if it is an issue, the program manager would have to mark the received (but unmarked) parts as legacy items.	Closed as of 7-30-03
95	DALO-SMP (L. Tutor-Crytzer)	Global	The UID effort to date has focused primarily on the structure of the UID, item marking and AIT requirements. Full logistics impact of this initiative has not been identified/defined.	Agreed.	Closed as of 9-5-03
96	DALO-SMP (L. Tutor-Crytzer)	Global	Integration with existing AIT initiatives is critical to ensure standardization of AIT across DoD.	Scanners used in current AIT initiatives are not backwards compatible and most likely do not meet UID requirements. In order to meet UID requirements, new or replacement AIT devices will need to be purchased. See item #24 for ERP resolution	Closed as of 9-5-03
97	DALO-SMP (L. Tutor-Crytzer)	Global	MIL-STD 129 and MIL-STD 130 must be accommodated. Special containers used to protect UID marked components may also be marked with a UID.	Special containers can be UID items in their own right. Special containers that qualify for a UID shall have the UID permanently marked on the container. At no time should the contents of the container be included in the container's UID mark but in a temporary label that is obviously different from the UID mark.	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
98	DALO-SMP (L. Tutor-Crytzer)	Old 10, New 9	Guide should mention configuration changes include modifications, maintenance and rebuild of items in the Recapitalization program.	It is generally understood what constitutes configuration changes. The Recapitalization Program is an Army program, and any guidance on application, or non-application, of UID to Recapitalization items should come from the Army.	Closed as of 7-30-03
99	BAE Systems (Howard Mason)	Global	The \$5000 threshold could lead to inconsistent marking for non-serialized parts, in a situation where an initial purchase of components has a unit price in excess of \$5000 (and therefore has to be marked), and a production batch has a cost under the threshold.	<p>The threshold is established in DoD I 5000.64 as “Accountable records shall be established for all property purchased, leased (capital leases), or otherwise obtained, having a unit acquisition cost of \$5,000 or more (and land, regardless of cost), and items that are sensitive or classified.” It is the responsibility of the program manager to have items uniquely identified. In the case cited above, there would be no regulatory requirement to uniquely identify the item once its unit acquisition cost fell below \$5,000. The item would also fall into a different property management category. The program manager could decide to continue to mark the item if there was a compelling reason, even though there would be no regulatory requirement to so do.</p> <p>Determine that scope is outside of the Business Rules Team. Forward to the Policy Team for inclusion/clarification in the UID Guide.</p>	Forwarded to Policy team as of 9-5-03
100	BAE Systems (Howard Mason)	Global	Similarly, what happens in the case where a component has multiple suppliers, with different prices above and below the threshold, and hence some components require UID and others do not.	<p>The program manager could decide to uniquely identify all these items if there was a compelling reason, even though there would be no regulatory requirement to mark those under \$5,000. Those under \$5,000 are not required to have property records if they are not sensitive or classified items. The program manager would have to balance all considerations in the decision-making process.</p> <p>Determine that scope is outside of the Business Rules Team. Forward to the Policy Team for inclusion/clarification in the UID Guide.</p>	Forwarded to Policy team as of 9-5-03
101	Jacklets	Global	How does the UID policy apply to property procured under old rules and remaining in place?	<p>Business rules specific to property management items will be developed and approved under a separate team. An additional business rules team has been initiated to handle property management, property accounting, contracts and administration. Rich Culbertson and Pat Jacklets will remain on both teams to ensure consistency and communication between the two teams. This item will be forwarded to that team for approval.</p> <p>The rules (new rules #30, 31, 32,33, 34, and 35) will be placed in Version 3.1 of the UID Business Rules for Item Marking under the title, “Property Management”</p>	Closed as of 7-30-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
102	Jacklets	Global	How do you address assemblies of property items that each have a UID and are reconfigured during transfer to another site?	It is assumed that the assemblage of property items that each has a UID is an end item with its own UID. In this case, if items were reassembled into a new end item, the new end item would require a new UID. If previous end items so assembled were deconstructed during this process, the UIDs that belong to those end items would be retired. All sub-components would retain their original UID.	Closed as of 7-30-03
103	Jacklets	Global	Will the UID policy apply to short-term deliveries (i.e., spares or other materials under a BOA) that could be considered "new solicitations"? If so, there are many issues related to part marking that will need to be resolved very soon (i.e., no IAC code for CAGE).	The UID policy applies to new solicitations issued after January 1, 2004, for new equipment, major modifications and reprocurments of equipment and spares. The policy memorandum signed by the Acting Under Secretary of Defense (Acquisition, Technology and Logistics) on July 29, 2003 also states "I strongly encourage Component Acquisition Executives to incorporate this policy into ongoing contracts where it makes business sense to do so." So, if the business case justifies it, an ongoing Basic Ordering Agreement (BOA) could be modified, at the discretion of the program/item manager, to require unique identification of those qualifying items being delivered under the BOA. This item will be forwarded to the Property Management Business Rules team for review as a contractual issue.	Closed as of 7-30-03
104	Jacklets	Global	Does UID require manufacturing drawings to be changed?	Drawings will be changed in accordance with contract provisions, or in their absence, contractor practice. Generally, any markings to be placed on an item are required to be detailed in the technical documentation. The policy requires that UID markings comply with the provisions of MIL STD 130.	Closed as of 7-30-03
105	Jacklets	Global	Does/will UID policy apply to items that are already marked with a unique identifier (i.e., items covered by the Nuclear Regulatory Committee)?	The contractor determines what is serially managed based on circumstance. Nuclear material should be exempt as the NRC controls it. However, if UID is required, the program/item manager should obtain the information from the NRC, not the contractor. James/Max to check with NAVSEA 08 on how they mark and track their items.	Closed as of 7-30-03 Reopened 11-13-03
106		Global	Do "tangible items" include things like Compact Discs, training manuals, etc?	Yes. An item is a single article or a unit formed by a grouping of component or constituent parts. In the Department, an item is any article produced, stocked, stored, issued, or used; or any product, including systems, materiel, parts, subassemblies, sets, and accessories. MIL-STD-130 defines an item as "a non-specific term used to denote any unit or product including materials, parts, assemblies, equipment, accessories, and computer software." Items such as compact discs and training manuals would probably be considered as accessories.	Forwarded to Policy team as of 8-27-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
				The team determined that while media is tangible, content is intangible and most of the value may be contained in the content. The team decided to forward this item to the Policy team for clarification (with the assistance of OSD PPE). Rich Culbertson will forward the DFAR definition of "item" to the Policy team as well.	
107	Denham	19	I have some real concerns on the items listed under "Metadata Requirements". The last time we got together we decided on the field length based on existing standards. The implied change negates our previous agreement and has serious flaws. Not to mention cost drivers to the industry. Why was this changed? I would like to revisit this issue at the next meeting. Someone will have to come up with a compelling reason to limit the data field size which in turn causes the supplier to come up with a new numbering system to meet the requirements.	The group decided that this is a decision that needs to be made at the executive level since it will impact cost either to industry or DOD. This item will be forwarded to the Policy team for review. Additionally, select participants in the GEIA conference on Sept 9-12 will discuss the item and make a recommendation to the Policy team.	Forwarded to Policy team as of 8-27-03
108	G-4 (Ben Morgan)	Global	Special weapons and submarine communities may not permit anyone to physically mark an item with a UID. Also, the nuclear or special weapons folks will modify their databases to accommodate a UID. Someone needs to see what can or cannot be done.	This is an implementation consideration that may require a subsequent change to the business rules. Implementation of the UID will be subject to exceptions, based on specific program needs. If a UID would create a security or engineering breach, the program would need to make modifications to how the policy is implemented. MIL-STD-130 is the appropriate source for addressing this concern as it relates to UID requirements.	Closed as of 9-5-03
109	UCC (Jim Petraghani and Frank Sharkey)	Old 16, New 15	Reword as follows: The UID or the UID component data elements, at a minimum, should be contained in a Data Matrix ECC200 symbol. Data may be contained in other AIT media (e.g., contact memory buttons, linear bar codes, radio frequency identification tags , etc.) in addition to instead of the Data Matrix symbol . The physical data carriers that contain the UID, or the UID-required elements, shall remain readable and non-transferable until the item is destroyed. Rationale: For direct part marking, the Data Matrix symbol provides an	See response to #82.	Closed as of 9-25-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
			<p>adequate solution for automatic identification of the item marked. The UID policy encompasses a much broader range of identifying an item. The installed base of equipment for marking, reading and verifying matrix symbols is very small (3 to 5 percent?) relative to the installed base of equipment for marking, reading and verifying linear symbols. The current auto id technology infrastructure predominantly supports marking and reading of linear bar code symbols. Requiring suppliers to mark, read and verify a matrix symbology would unnecessarily add cost to systems that are currently identifying items with other machine readable technologies.</p> <p>International standards for automatic identification technology relating to matrix symbologies are not yet published. In particular, conformance standards will not be published until sometime in 2004. Conformance standards for matrix symbologies include those for print quality, scanner performance and verifier conformance.</p>		
110	G-4 (Ben Morgan)	Global	Determine if UID is acceptable to NATO, UN, and other treaty signatories (Mason)	The UID is assumed acceptable to the UN via EAN.UCC since EAN.UCC participated in UID working groups. Once Dan Kimball briefs NATO in October 2003, he will open a new work item if issues arise.	Closed as of 9-5-03
111	IBM (Milligan)	Old 15, New 14	Why is it necessary to have the UID elements appear first in the string?	Team agreed to leave the first bullet of Business Rule 15 in but replace "shall" with "should".	Closed as of 7-30-03
112	Rich Culbertson	New	Determine if model number can or should be substituted for part number in the UID constructs for Property Management.	No new rule needs to be written for items in new solicitations as indicated in the policy. This issue will be forwarded to the upcoming legacy team.	Forwarded to legacy team
113	Kimball, Goodell	Old 26, 28 New 27	Add "or centrally" after locally.	This item was approved and closed due to a lack of substantial objections from the team.	Closed as of 9-25-03
114	Kimball, Goodell	Old 27, 29 New 28	Approve slight modifications to this rule to clarify intent and state preference for re-serialization.	This item was approved and closed due to a lack of substantial objections from the team.	Closed as of 9-25-03
115	Kaarlela	Old 24, 26 New 25	Develop wording to address the requirement for passing data without the item (i.e., one party may not be able to re-construct the UID or find the appropriate data records without the component data elements)	<p>What should the process be for communicating how the UID was constructed by the entity that created the UID to other parties receiving electronic UID information? How long should this communication process continue?</p> <p>Proposed new rule: A database shall be capable of using the UID or the combination of its component data elements to retrieve the data record associated with the item represented by the UID. This modification was approved.</p>	Closed as of 9-25-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
116	Goodell	New	Does DOD want to differentiate, using the data qualifiers, between items serialized by the manufacturer and items serialized by another entity (e.g., legacy item re-serialization).	The team agreed that the answer to this question is no because the definition of EID (for UID purposes) is the entity that serialized the item. It should not matter if that entity was the manufacturer or not. For instances in which the entity serializing is not the manufacturer and databases want to capture the manufacturer, the actual manufacturer should be marked on the item, using a different data qualifier from the UID EID and recorded in the database.	Closed as of 9-25-03
117	IBM (Milligan)	Global	How will marking be handled for sets or kits?	There is no need to draft a rule to address this because sets and kits are considered end items and will follow the same guidance as other end items. Dan will confirm with Charlie Milligan that this item can be closed.	Closed as of 9-25-03
118		Old 6 New 5	What is the true definition of Original Part Number? Is it the original at the time of delivery? On a legacy item, if you cannot confirm the existing part number is the original, can the existing part number be used as the original for purposes of generating the UID?	Create a new rule under the legacy category to instruct how to determine original part number for legacy items for purposes of UID Construct #2. The proposed rule should state that original part number should be determined in the following priority order: <ul style="list-style-type: none"> - Use the original part number if it can be determined - Use the current part number at the time of acquisition, if it can be determined - Use the current part number at the time the UID is created The proposed new rule will be entered into the current business rules, pending discussion.	Open Work Item #5
119	Kimball, Goodell	New	How do we create a UID solely from the human readable markings (i.e., MRC is unreadable)	According to MIL STD 130 L, the data qualifiers will exist on the human readable label. Therefore, the new rule (inserted as the second rule in the section "Capturing the UID" will read: If the symbol is unreadable, the human readable data qualifiers and data elements adjacent to the symbol shall be manually input to derive the UID using existing Business Rules.	Closed as of 9-25-03
120	Goodell	Old 29 New 28	Add new business rule(s) under Special Rules for Existing Inventory to address re-serialization.	The team has drafted business rule 28 to address this. The preferred option for maintaining part number integrity during re-serialization is to capture old EID and SN in DLIS with new EID and SN to provide a cross reference. No new rule is required to address this. Original data elements deemed necessary during re-serialization should be preserved in both the data carrier and the database. This item will be forwarded to the TIWG to determine the AIS impacts and develop any additional requirements for data gathering or data	Forwarded to TIWG as of 9-25-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
				preservation. Business rule has been forwarded to TIWG for comment.	
121	Ben Morgan	New	Develop language to clarify how the “DD” format should be handled in either scenario (i.e., SC 31 either accepts or rejects DOD’s proposal.)	There is no need to draft a rule to address this issue, since it is a policy item. Guidance provided by the policy team to date indicates that if the new format code is approved, those using the “DD” format will switch to the new format without having to change items already marked with “DD”. If the format is not approved, those using the “DD” format will be provided additional guidance.	Closed as of 9-25-03
122	Kimball, Goodell	Old 16, 15 New 14	Approve second sentence (new insertion).	Approved by team.	Closed as of 9-25-03
123	Kimball	Old 16, 15 New 26	There have been questions about what non-transferable means. Perhaps we could consider a different word or phrase such as permanent. Also, add a note saying that “transfer of the UID or the mark containing the UID elements to another item is prohibited.”	Business Rule 26 addresses this issue. “once retired” was removed from the end of the rule, leaving the rule to state “The UID cannot be transferred from one item to another item once assigned and cannot be reused.”	Closed as of 9-25-03
124		Old 14, New 13	Guide should footnote enterprise identifiers by noting that there can be more than one (see business rule #14).	Forward to the policy team for inclusion into the UID Guide.	Forwarded to Policy team as of 8-27-03
125	Kimball	Global	The UID Guide should caution organizations from using both constructs.	Forward to the Policy Team for inclusion in the UID Guide.	Forwarded to Policy team as of 9-5-03
126	Jacklets	Global	Will the UID policy apply to short-term deliveries (i.e., spares or other materials under a BOA) that could be considered “new solicitations”? If so, there are many issues related to part marking that will need to be resolved very soon (i.e., no IAC code for CAGE).	The UID policy applies to new solicitations issued after January 1, 2004, for new equipment, major modifications and re-procurements of equipment and spares. The policy memorandum signed by the Acting Under Secretary of Defense (Acquisition, Technology and Logistics) on July 29, 2003 also states “I strongly encourage Component Acquisition Executives to incorporate this policy into ongoing contracts where it makes business sense to do so.” So, if the business case justifies it, an ongoing Basic Ordering Agreement (BOA) could be modified, at the discretion of the program/item manager, to require unique identification of those qualifying items being delivered under the BOA. This item will be forwarded to the Property Management Business Rules team for review as a contractual issue.	Forwarded to Business Rules – Contract and Admin. Sub-team as of 8-27-03
127	Jacklets	Global	Does UID require manufacturing drawings to be changed?	Drawings will be changed in accordance with contract provisions, or in their absence, contractor practice. Generally, any markings to be placed on an item are required to be detailed in the technical documentation. The policy requires that UID markings comply with the provisions of MIL STD 130.	Forwarded to Business Rules – Contract and Admin. Sub-team as of 8-27-03

UNIQUE IDENTIFIER (UID) BUSINESS RULES TEAM

DISPOSITION OF COMMENTS – Version 10

#	Submitter	Affected Rule	Comment	Resolution	Status
				This item will be forwarded to the Property Management Business Rules team for review as a contractual issue.	
128	Kimball, Goodell	19	Approve the last bullet as accurate and necessary.	This item was approved in Version 3.1	Closed as of 7-30-03
129	Jacklets	Global	Does/will UID policy apply to items that are already marked with a unique identifier (i.e., items covered by the Nuclear Regulatory Commission)?	The contractor determines what is serially managed based on circumstance. Nuclear material should be exempt as the NRC controls it. However, if UID is required, the program/item manager should obtain the information from the NRC, not the contractor. This item will be researched to determine what the Nuclear Regulatory Commission (NRC) uses for unique identification and combined with Item #4.	Closed as of 8-27-03, consolidated under Open Work Item #4
130	GEIA	Old 27 New 26	Proposed new rule: An item will retain the same UID throughout its life, whatever its use, ownership or modification, to ensure traceability and audit, unless the item is certified by the accountable authority as guaranteed unusable and beyond any repair or physically destroyed - and recorded permanently in the UID Registry (common attributes - eg. destroyed...). In the unlikely event that a certified item is then reworked or remanufactured for a new purpose, a new UID will be issued but the UID Registry database must show a direct link between the old and new UID.	Business Rule 26 addresses this issue. "once retired" was removed from the end of the rule, leaving the rule to state "The UID cannot be transferred from one item to another item once assigned and cannot be reused." See Disposition #123.	Closed as of 11-13-03
131	Team	New	Determine the list of UID equivalents.	GIAI, GRAI, and VIN are accepted as UID Equivalents. HIBCC and CLEI do not meet the criteria. Dan Kimball will research HIBCC and CLEI for confirmation and report to the UID team.	Open Work Item #56
132	Chris Sautter	Old 28 New 27	In business rule 27 there is a sentence that needs to be added to the first bullet. "In this case the serial number must also be changed to comply with the uniqueness standard".	The team added "The serial number must comply with Rule #9." In replacement of the suggested text. The team also added the reference to Rule #9 to the 3 rd bullet of Business Rule 27.	Closed as of 11-13-03
133	Chris Sautter	Global	Revisit the solution for what TEIs to use for re-serializing legacy parts (i.e., SPL/UCN vs. CAG/SER, DUN/SER, or EUC/SER)	This should also be considered for data and application identifiers. Chris Sautter will draft a business case for the use of SPL/UCN for review.	Open Work Item #58
134	Team	Old 29 New 28	The group decided that for legacy items lot/batch number could be used in a variant to Construct #2, referred to as Construct #2A. For new items, the Guide applies. The group recommends communication with JOCG to verify how they serialize for item marking.	Rob Leibrandt will contact JOCG to determine their conventions both for new parts under the UID policy and for legacy parts.	Open Work Item #134