

Deadline of Submission of Comments: 26-Aug-24
 Document Number: ASB TR 012
 Document Title: Technical Report on the Articulation of the Reasoning and Foundational Principles Behind Friction Ridge Examinations

Comment #	Text Line # (s)	Document Section	New Section	Type of Comment	Current Document Wording	Proposed Revision	Revision Justification	Final Resolution
				E-Editorial T- Technical				
1		Totally		T	The document currently uses the words "likelihood" and "probability" in multiple locations.	Suggest consideration of rewording both terms to something else in all instances of use.	Just hesitant as we currently have no likelihood or probability ratios. I wouldn't want someone to read this document, see recommendations, and then ask examiners on the stand for likelihood & probability numbers. For example, in section 10. It states the strength of the evidence depends on the probability of one proposition outweighing the other. This further infers that it depends on the probability of the set of similarities occurring in an impression from a different source. But we don't have a definition for that sort of probability, nor numbers for it yet. Perhaps a similar word that would not invoke a request for specific research & numbers would be better? I admittedly have not read some of the references for this section, so perhaps they address this and my concern is moot. Thanks for the time!	REJECT - The terms "likelihood" and "probability" do not require the expression or calculation of a specific number. Both terms can refer equally to formal statistical calculations as well as informal (non-mathematical) assessments. These values are currently assessed qualitatively and subjectively during friction ridge examination (unless you are using a probabilistic model) and an examiner should be able to articulate how these assessments are made if requested to do so.
2		1		T	This document provides reference information to aid in articulating the reasoning and foundational principles behind the examination of friction ridge evidence. It provides additional explanations and references in support of fundamental statements made within the friction ridge discipline. The statements in the document include basic premises of friction ridge examination, the execution of the examination process, and the communication of the results of examinations. This document does not address the specific friction ridge examination conclusions or wording of those conclusions which are the subject of a separate document.	This document has taken on some things you can't say but fails to address what you can say about performance metrics, and we are not aware of any place where SC has addressed what are appropriate performance metrics and what you can say about those despite the FSSB guidance documents providing guidance on these subjects. There is FSSB guidance on testimony and reporting, which includes performance metrics, and the document should include some way of articulating the accuracy and error rate of the method. There are models for doing that see: PCAST, AAAS, Swafford etc - but you need to do more than you do here.	While this document does reference some prohibited language, this document does not address what the appropriate performance metric(s) is for this discipline or what the available research reveals about those performance metrics. The scope neither lists what performance metrics should be or what performance metrics are known nor explicitly states the document does not address these. Odd to tell you what not to say, without telling you what you can say. If the intention of the doc is to not reach that far, why say what you cant do but not what you can.	ACCEPT - See addition of section on Articulation of Performance Studies
3		3.1		T	identification	do not use the term identification	Given what ASB says about a technical report, should not use categorical definitions	REJECT - Per the ASB Manual ... "A Technical Report provides scientific, technical, terminology, or operational information relevant to a standard, a field of activity, or a profession." The ASB Manual also states... "Technical reports do not set requirements or recommendations and are not suitable for conformity assessment. Content is expressed in the most appropriate manner for the subject." The current document meets these guidelines. The provided justification does not support the proposed revision. Furthermore, the current document specifically states with its Scope that ... "This document does not address the specific friction ridge examination conclusions or wording of those conclusions which are the subject of a separate document." As such, the request to revisit the use of the term identification is not within the scope of this document.
4		3.1		E	Source identification is defined as an accumulation of similarities "that supports a conclusion of source identification." By itself similarities do not support such a conclusion; they do so only in the context of the entire print. If because of other print characteristics mean an identification is excluded, the similarities present do not support a source identification conclusion.	Insert the word "can" or "may" before "supports." i.e., "that can/may support a conclusion of source identification"		REJECT - The definition referenced is for "agreement" and not "source identification". The definition is written in the affirmative requiring "the accumulation of similarities" and "overall conformity" "that supports a conclusion of source identification". There is no suggestion within this definition that agreement (as defined here) is associated with less than sufficient support for source identification. The definition is appropriately stated.
5		3.5		E	The last line beginning with "usually" is not a sentence.	Either put in parentheses or add a subject, maybe simply the term being defined or the word "This". This can also be fixed by replacing the period at the end of the prior sentence with a comma, or by placing the line in parentheses.		REJECT - Per sections 13.2.1-13.2.2 of the ASB Manual terms are "described in sentence-like structure" and definitions are "written as single phrases not as sentences". There is no requirement for either to fit the conventional requirements of sentence structure.
6		3.6		E	The last line in each beginning with "usually" is not a sentence.	Either put in parentheses or add a subject, maybe simply the term being defined or the word "This is...". This can also be fixed by replacing the period at the end of the prior sentence with a comma, or by placing the line in parentheses.		REJECT - Per sections 13.2.1-13.2.2 of the ASB Manual terms are "described in sentence-like structure" and definitions are "written as single phrases not as sentences". There is no requirement for either to fit the conventional requirements of sentence structure.
7		3.7		T	conclusion (synonym of source conclusion) Opinion stated by an examiner after interpretation of observed data. The opinion is the professional judgment that the observed data can offer support for one proposition over another. A conclusion is distinct from a "proposition."	should not be defined as the use of propositions/ explanation that is support for one over another	while we understand that in practice with FP examinations a proposition is one over another, that is not a statistically correct definition of propositions and not how they generally used in forensic disciplines. Propositions are mutually exclusive but not exhaustive	REJECT - It is wholly appropriate to provide a definition which is accurate for the usage within the context of this document/discipline. There is no need to provide alternate definitions that are not relevant to the content of the document or the discipline. The definition is appropriately stated.
8		3.8		T	A dissimilarity, or an accumulation of dissimilarities, that is deemed to be outside of expected variations in the appearance of impressions from the same source, resulting in overall nonconformity.	use a different word than non-conformity	use of the term non-conformity is confusing bc suggests lab error or method non conformance or procedure based and not sure that is what they mean here	REJECT - Within the context of this definition there is no suggestion that nonconformity is being used to indicate the a formal quality assurance action. The definition is appropriately stated.
9		3.9		T	The degree to which information in an impression can be used to distinguish it from impressions made by different sources. The discriminability of an impression	Any use of these term rarity or probability must acknowledge the lack of known statistics or empirical basis. There also needs to be an acknowledgement that LR are personal and not empirically based	rarity or probabilistic statements should not be used unless the empirical basis for such is acknowledged, or where there is none, then that needs to be explicitly stated bc both rarity and probability statements imply such.	REJECT - The proposed revisions are not appropriate for a basic definition.
10		3.10		E	The last line in each beginning with "Not to be..." is not a sentence.	Either put in parentheses or add a subject, maybe simply the term being defined or the word "This is...".		REJECT - Per sections 13.2.1-13.2.2 of the ASB Manual terms are "described in sentence-like structure" and definitions are "written as single phrases not as sentences". There is no requirement for either to fit the conventional requirements of sentence structure.

11		3.11	E	Evaluation is defined as "The weighting of the aggregate strength of the evidence (observed similarities and dissimilarities when considering two competing propositions) between the observed data in the friction ridge impressions being compared...". As written it sounds as if the presence of more similarities than dissimilarities might mean that a source conclusion should be reached. But a friction ridge examiner is not engaged in a counting process. Rather the entire print is being evaluated as a totality. Special attention is given to similarities and dissimilarities, but they are not being weighed in some numerical fashion against each other. There may be far more similarities than dissimilarities but if there are only a few clear and meaningful dissimilarities which cannot be explained away as an artifact or deviant for some other reason, no source identification should be drawn.	Something like, "A comparison of two impressions paying special attention to similarities and dissimilarities to determine the likelihood that the two impressions come from the same source." would work, or something similar that makes it clear that merely counting the number of similarities and dissimilarities is not what is required here - some of those similarities and dissimilarities will have differing levels of significance or will carry different weight.		REJECT - The current definition clearly states that there is a "weighting of the aggregate strength of the evidence" and does not suggest that this weighting is accomplished by merely counting the number of similarities/dissimilarities. The proposed revision is stated with bias toward the same source proposition as opposed to being neutral to the two competing propositions. Furthermore a basic definition should not include language directing examiners on how to perform said action (i.e., "paying special attention"). The proposed revision does not improve on the current definition. The current definition is appropriately stated.
12		3.12	T	exemplar impression (synonym of exemplar or known and exemplar prints) exemplar or known (synonym of exemplar impression and exemplar prints) exemplar prints (synonym of exemplar impression and exemplar or known) The deliberately recorded images or impressions from the friction ridge skin of an individual.	either remove may rely on or specify what info cannot be relied upon and what can	is there any info they cannot rely on? The "may rely upon" clause is confusing or cause unnecessary confusion if any information seen would suffice	REJECT - The quoted "may rely upon" language is not present in the referenced definition. <i>[If the commenter intended to reference the definition in Section 3.12 which includes said language, see the resolution of comment 13]</i>
13		3.13	E	The words "examiner that a "examiner may rely on to reach" are problematic. While the kinds of factors that are listed may all figure in an evaluation, most, if not all cannot be relied upon in reacting a decision.	A better way to phrase this would be that an "examiner might appropriately consider in reaching..."		REJECT - The language "may rely upon" is appropriate. It does not suggest that any of the listed factors would be the sole bases for a conclusion, nor what weight would be assigned to the observation, but that their observation may contribute to the aggregate support for a conclusion. The use of "may" was intentional to indicate an Examiner's choice to include said observation in the support for the conclusion or not.
14		3.14	E	The first sentence is a bit confusing. "In theory" implies that the concept being defined may not, in fact, exist. Also, the definition goes on to talk about friction ridges existing during friction ridge formation. We think we understand what is meant by this - namely that as some friction ridges have formed the patterns those yet unformed ridges will take become constrained, but the language is nonetheless confusing.	If pattern force areas only exist in theory, then the sentence should begin something like "A region of friction ridge skin that according to some theories was forced to form..." but essentially our suggestion is that more thought should go into how best to communicate the point the SAC wishes to make.		REJECT - As the formation of the friction ridge skin cannot be directly observed, the inference that this contributes to minutiae density is in the realm of theory. The proposed revision does not improve upon the current definition.
15		3.15	E	Probability is defined as "An expression of chance that a particular event occurs." This isn't very helpful because it just raises the issue of how to define "chance." Moreover, "occurs" seems to be the wrong word. Probability is usually attached to the chances that something exists or, with respect to events, that the event will occur or has occurred rather than an event "occurs."	Maybe a better definition would be the "The likelihood, usually expressed numerically, that a proposition or hypothesis is true." One might also have to define likelihood, however, but it is a better term than "chance" in this context, particularly given its use in Bayesian statistics.		REJECT - The usage of probability within this document is not in reference to formal statistical calculations, but rather the subjective, professional judgement of the examiner. As such, the definition is appropriate for the context of this document.
16		3.15	T	probability An expression of the chance that a particular event occurs.	Any use of these terms rarity or probability must acknowledge the lack of known statistics or empirical basis. There also needs to be an acknowledgement that LRs are personal and not empirically based	rarity or probabilistic statements should not be used unless the empirical basis for such is acknowledged, or where there is none, then that needs to be explicitly stated bc both rarity and probability statements imply such.	REJECT - The proposed revisions are not appropriate for a basic definition.
17		3.16	E	Propositions are defined as "Statements about the actual state of nature or an event which is unknown or unknowable." But "state of nature" is an odd term as it is unclear whether this refers to the weather or some other natural phenomenon. Also, when referring to "statements about events unknown or unknowable", it doesn't seem to follow that these must be "propositions". By that logic, "I don't know if God exists" could be a proposition.	As used here, something like "assertions of claimed truths" would be better. Also note that propositions are proclamations or assertions; they are not just "statements about".		REJECT - The substitution of "assertions" for "statements" and "claimed truths" for "state of nature" is a matter of wording preference and does not substantively alter the meaning of the definition. Furthermore the use of "assertions of claimed truths" may introduce language that overstates the nature of a proposition (i.e., a proposition is. The proposed revisions do not substantively improve upon the definition as stated.
18		3.16	T	propositions Statements about the actual state of nature or an event, which is unknown or unknowable. Not to be confused with "conclusions," nor "source conclusions" (refer to those definitions for further clarification)	ask the stats resource group what the correct definition of propositions is	not clear if this is a correct definition	REJECT - The definitions included are for terms as used within the context of this document. The term proposition is not being used to refer to formal statistical calculations, and as such, a definition for propositions as used for statistical calculations would not be appropriate. The current definition is appropriate for the usage within this document.
19		3.18	T	rarity (of a feature type) The frequency or prevalence of a friction ridge feature, either in isolation or in conjunction with other information about its local context.	Any use of these terms rarity or probability must acknowledge the lack of known statistics or empirical basis. There also needs to be an acknowledgement that LRs are personal and not empirically based	rarity or probabilistic statements should not be used unless the empirical basis for such is acknowledged, or where there is none, then that needs to be explicitly stated bc both rarity and probability statements imply such.	REJECT - The proposed revisions are not appropriate for a basic definition.
20		3.19	E	"Not to be confused with "agreement."" is not a complete sentence.	Either put in parentheses or add a subject, maybe simply the term being defined or the word "This is..."		REJECT - Per sections 13.2.1-13.2.2 of the ASB Manual terms are "described in sentence-like structure" and definitions are "written as single phrases not as sentences". There is no requirement for either to fit the conventional requirements of sentence structure.
21		3.20	E	Source is defined as "An area of friction ridge skin of an individual from which an impression originated." This cites a source for the definition so it appears that the authors of this document are not responsible for the grammatical issues, but they are there and the definition is unclear as a result.	A better definition would be "The portion of an individual's friction ridge skin that gave rise to the impression being examined." or "The portion of an individual's friction ridge skin associated with the impression." Technically, the words "friction ridge" are also not needed.		REJECT - The proposed revisions do not improve upon the provided definition. The definition is grammatically correct.
22		3.21	E	Strength of the evidence is defined as "the relative support the evidence lends one proposition over another.". This definition is wrong. Strength of the evidence is not a relative concept. One would never say "The strength of the evidence is 50/50" or "is indeterminate."	A better definition would be something like, "The degree to which evidence supports a proposition that it is offered to prove. It may be expressed verbally or numerically as a probability."		REJECT - As it appears within this document (see Section 10.2.3) the strength of evidence is indeed an expression of the relative levels of support for one proposition over another.
23		3.21	T	strength of the evidence The relative support the evidence lends to one proposition over another. It may be described verbally or numerically.	"It may be described verbally or numerically," change to "It may be described verbally, numerically, or demonstratively through the use of marked images." (or similar)	support is often demonstrated using visual documentation (marking features on images); these images are discoverable in court and may be used to demonstrate/describe the strength of a conclusion past "verbally" or "numerically"	REJECT - The proposed revision is too granular for a basic definition. Furthermore, the provision of marked images could be proffered as a demonstration of "the evidence" and not "the strength" thereof.
24		5	E	5 Discriminating and Persistent Nature of Friction Ridge Skin	no change except to increase the font size: font size is inconsistent with "6", "7", "8" and so on	consistency with headers and ease of skimming document when used as a quick reference/resource	ACCEPT
25		7.2	T	"Examiner confidence in the existence and type of observed data increases with the clarity of the data observed in an impression." observed in an impression."	"Examiner confidence in the existence and type of observed data increases with the clarity of the data observed in an impression. Examiner confidence in the existence and type of observed data may also be impacted by training and experience."	I was thinking of how training and experience definitely do impact a person's ability to "see" data/features. Not just make decisions, but even actually see them. We know of instances where more experience/trained people see far more data than people with little or no experience/training. I don't think someone should claim that experience & training make them more "correct." But to have a document that says implies the ability to observe data is impacted ONLY by clarity also seems lacking. Was wondering if a comment about training & experience should be included, especially since references provided do include studies of novices vs. experts? Thanks for the consideration!	REJECT WITH MODIFICATION - While training and experience are fundamental components of building expertise, an examiner's confidence in what they see is not technically the same as their ability to see this information (though it is related). Within the context of this section, the specific inclusion of an "Examiner's confidence" was determined not to be needed and so the existing "Examiner's confidence..." was slightly reworded to simply state "Confidence...". Note: There is no wording in this section that states or implies that the ability to observe information is only based on clarity. The first two sentences of this section clearly support that expertise (e.g., training and experience) is needed.

26		7.2		T	Examiners have demonstrated an ability to observe data such as ridge events, creases, and scars in friction ridge impressions that surpasses that of untrained individuals. Examiners are capable of observing data even in highly distorted impressions. Examiner confidence in the existence and type of observed data increases with the clarity of the data observed in an impression.	cite specifically for this statement or else tone down to be commensurate with what the research actually shows	is this accurate or supported by research that examiners are capable of observing data even in highly distorted impressions or is that an overstatement?	REJECT - Across the totality of this document, sufficient citations are provided to support the statements. The commenter does not refute the statement in the justification but rather questions it without providing any support to the contrary.
27		9.1		E	"The larger the set of similarities observed between two impressions the greater the likelihood of those observations if the impressions originated from the same source versus if they originated from different sources."	"There is a greater likelihood two impressions originated from the same source than from a different source when a larger set of observed similarities exists between the two impressions."	The current sentence feels clunky and hard to understand. Especially the part of "...the greater the likelihood of those observations if the impressions..." So I'm just throwing out an alternate option for clarity :-)	REJECT - The current statement is worded purposefully to emphasize the observation first and the conclusion second to avoid statements that commit the prosecutor's fallacy of transposing the conditional.
28		9.1		T	The larger the set of similarities observed between two impressions the greater the likelihood of those observations if the impressions originated from the same source versus if they originated from different sources. Furthermore, the greater the clarity and/or rarity of those similarities, the greater the likelihood of those observations if the impressions originated from the same source versus if they originated from different sources.	Any use of these terms rarity or probability must acknowledge the lack of known statistics or empirical basis. There also needs to be an acknowledgement that LRs are personal and not empirically based	rarity or probabilistic statements should not be used unless the empirical basis for such is acknowledged, or where there is none, then that needs to be explicitly stated bc both rarity and probability statements imply such.	ACCEPT - Added Section 9.2.5 as "Likelihoods, probabilities, and rarity may be empirically derived (e.g., from validated statistical models) and/or subjectively assigned by the examiner based on their professional judgment."
29		9.2.2		T	Not all observed data carry the same weight. Observed data with higher clarity generally indicate more accurate representations of the source friction ridge skin. Observed data that are rarer allow the examiner to better discriminate between two sources.	Any use of these terms rarity or probability must acknowledge the lack of known statistics or empirical basis. There also needs to be an acknowledgement that LRs are personal and not empirically based	rarity or probabilistic statements should not be used unless the empirical basis for such is acknowledged, or where there is none, then that needs to be explicitly stated bc both rarity and probability statements imply such.	ACCEPT - Added Section 9.2.5 as "Likelihoods, probabilities, and rarity may be empirically derived (e.g., from validated statistical models) and/or subjectively assigned by the examiner based on their professional judgment."
30		9.2.4		E	Here, and in general with respect to the discussion of the implications of numbers of similarities and dissimilarities, it should be clearer that not all dissimilarities are weighed equally. It might take only one clear dissimilarity to justify an exclusion if it cannot be explained away (e.g. a scar on the finger of a suspect that is not present in the impression left and would have had to have been left if the person's finger was the source.)	Perhaps something like "Conversely, the larger the set of dissimilarities or the more significant/salient the dissimilarities observed between two impressions the greater the likelihood of those observations if the impressions originated from different sources versus if they originated from the same source."		ACCEPT WITH MODIFICATION - Modified current wording to ... "Conversely, the stronger the dissimilarity or larger the set of dissimilarities observed between two impressions the greater the likelihood of those observations if the impressions originated from different sources versus if they originated from the same source."
31		10.2.3		T	To determine the strength of the evidence, the examiner weighs the probability of observing the similarities and dissimilarities in two impressions assuming they were made by the same source against the probability of observing the similarities and dissimilarities assuming they were made by different sources. The strength of the evidence is the degree to which the probability of one proposition outweighs the probability of the other proposition.	Any use of these terms rarity or probability must acknowledge the lack of known statistics or empirical basis. There also needs to be an acknowledgement that LRs are personal and not empirically based	rarity or probabilistic statements should not be used unless the empirical basis for such is acknowledged, or where there is none, then that needs to be explicitly stated bc both rarity and probability statements imply such.	REJECT WITH MODIFICATION - As appears in the definitions, the term probability is not being used to refer to a formal statistical calculation, nor does rarity appear in the cited section; However, see new Section 9.2.5 for greater clarity of these terms and their applicability across the document.
32		11	12	E	No comments, really, we just wanted to say that this section is great and goes to great lengths to incorporate important human factors considerations into this document.	Nothing, just more like this from you and others! Hurrah!		ACCEPT - see addition of Bias in Limitations
33				Ballot Comment	I did notice something in section 11 that I find to be a bit contradictory. Section 11.2.1 a) Individualization, Made by, Originated from the same source, Exclusion of all others. Use of the term "individualization" or phrases such as "originated from the same source" (outside of the presentation of propositions)....			REJECT - The statements made in Section 4.6 of STD013 are the presentation of propositions. As such, the current wording (with the parenthetical caveat) is considered appropriate and within the context of the document as a whole should not lead to additional confusion.
34		11.2	12.2	T	identification	do not use the term identification	Given what ASB says about a technical report, should not use categorical definitions	REJECT - Per the ASB Manual ... "A Technical Report provides scientific, technical, terminology, or operational information relevant to a standard, a field of activity, or a profession." The ASB Manual also states... "Technical reports do not set requirements or recommendations and are not suitable for conformity assessment. Content is expressed in the most appropriate manner for the subject." The current document meets these guidelines. The provided justification does not support the proposed revision. The current document (as well as the Conclusions document) have substantially changed to both the definition of Source Identification as well as the guidance on how to communicate this conclusion effectively removing said conclusion from a categorical statement.
35		11.2.1	12.2.1	T	(Nothing to reference, language not in current draft)	Add a lettered subsection that addresses how an examiner should not imply that a conclusion is a fact (or known fact, or scientific fact, etc.). But add additional language expressing how an examiner should make clear the conclusion is their opinion, and that expressing it as an opinion is okay to do (with the limitations already described in the doc).	The industry appears to be confused on what the ASB docs are and are not allowing regarding opinion-based testimony. For example, the conclusions doc states an examiner shall not "assert that two impressions were made by the same source or imply an individualization to the exclusion of all other sources." Half of the industry seems to think this means we cannot ever say we believe impressions originated from the same source (in any context at all). They consequently have become upset, making claims of "What are we here for if we can't say two things are from the same source?" The other half of the industry seems to believe the document means yes you can still say it, but with limitations (don't imply it's a fact, give context, make it clear it is an opinion). The point is - people are reading the docs in very different ways and are becoming confused as to what the docs are allowing us to say and not. I think clarification on the issue that expressing conclusions as opinions is okay would be helpful to people. Especially to those who are upset, believing the docs tell them they can never say it at all. I understand the definitions of conclusions in the terms section states that conclusions are opinions. And also section 12 covers the idea that it is inappropriate to give a conclusion as a known fact. I just don't think people will piece all of these things together on their own to get the full picture. And therefore something in this particular section would be helpful for overall understanding. Something that ensures them they can express it as an opinion, so long as the suggested limitations are also given. And that that is okay. That the docs aren't saying "No, under no circumstances can you ever say you think they are from the same source...never ever!" (I know this got wordy, thank you!)	ACCEPT - This document is intended to provide greater clarity to the Conclusion document and the articulation of conclusions. To further that clarification, following addition was made. "(including using such language under the caveat that it is an examiner's "opinion")".

36	2nd paragraph, 1st sentence	11.2.1 d)	12.2.1 d)	E	certainly	certainly	spelling	ACCEPT
37		11.2.1 d)	12.2.1 d)	E	In practice, the concept of <u>certainly</u> is often inappropriately conflated with confidence.	'certainly' should be 'certainty'	spelling typo	ACCEPT
38		12	13	E	Again, we just wanted to say that this section is great and goes to great lengths to incorporate important human factors considerations into this document.	Please, sir/madam/esteemed colleague, may we have some more?		ACCEPT - see addition of Bias in Limitations
39		12.2.1	13.2.1	T	<p>While performance studies have demonstrated that friction ridge examiners in the aggregate can reach accurate conclusions (under specific test conditions), friction ridge examination is fundamentally an exercise in personal (professional) judgment. Decisions are made based on human observations. Examiners also apply personally-derived thresholds to effect examination decisions. While these personal observations and thresholds are not arbitrarily derived or applied they can vary from examiner to examiner.</p> <p>Studies have demonstrated that individuals can develop expertise in friction ridge examination by acquisition of relevant knowledge, experience, and training. Furthermore, studies have shown that examiners often reach consensus and that variability amongst examiners was most strongly associated with high complexity impressions and with decisions at or near sufficiency thresholds. The subjective nature of friction ridge examination means that examiners will not always agree</p>	Soften the claims about validation	The document attempts to cabin claims of validation but needs to be softened/tamped down even more to match what the empirical data shows and what it does not	REJECT - There is no discussion of validation within the cited section. If by validation you are referring to the statements regarding examiner accuracy and consensus, all statements made are supported by the cited research.
40		12.2.7	13.2.7	T	<p>It is inappropriate to assert that because a conclusion has been reproduced by others (through verification or other means) it is therefore accurate. In both practice and performance studies, errors have occurred that have been reproduced by other examiners. The only way to be certain of accuracy is to know ground truth. In the absence of ground truth, the most appropriate way to support the accuracy of a conclusion is by clearly demonstrating the support the data provide for the conclusion.</p>	include more on bias	section 12 on limitations in general needs to include more about bias, specifically wrt reproducibility and verification	ACCEPT WITH MODIFICATION - Added section on bias (in general). Limitations on reproducibility (with verification implied) already covered in cited section.