



**FBCA Policy Change Proposal Number: 2008-03**

**To:** Federal PKI Policy Authority  
**From:** Certificate Policy Working Group  
**Subject:** Proposed modifications to the Federal Bridge Certificate Policy  
**Date:** April 3, 2008  
**Title:** § 8.3 Assessor's Relationship to Assessed Entity

**Version and Date of Certificate Policy Requested to be changed:**

X.509 Certificate Policy for the Federal Bridge Certificate Policy Version 2.7, September 26, 2007

**Change Advocate's Contact Information:**

Name: John Cornell  
Organization: FPKI-CPWG  
Telephone number: 202-501-1598  
E-mail address: [john.cornell@gsa.gov](mailto:john.cornell@gsa.gov)

**Organization requesting change:** CPWG

**Change summary:** Clarification on what constitutes auditor independence.

**Background:** In reviewing a compliance audit, the CPWG encountered an instance in which the same firm that was conducting the compliance audit had also (through an acquired company) also written significant portions of the entity's CP and CPS. The CPWG was of the opinion that this would have the compliance auditor standing in judgment of their own work in drafting the CP and CPS, which called objectivity into question.

**Specific Changes:** Specific changes are made to the following section:

Insertions are underlined, deletions are in ~~strikethrough~~:

FBCA CP

**8.3 ASSESSOR'S RELATIONSHIP TO ASSESSED ENTITY**

For both the FBCA and Entity CAs, the compliance auditor either shall be a private firm, that is independent from the entity being audited, or it shall be

sufficiently organizationally separated from that entity to provide an unbiased, independent evaluation. An example of the latter situation may be an Agency inspector general. To insure independence and objectivity, the compliance auditor may not have served the entity in developing or maintaining the entity's CA Facility or certificate practices statement.

The Federal PKI Policy Authority shall determine whether a compliance auditor meets this requirement.

**Estimated Cost:**

No cost to the Federal Bridge CA.

**Risk/Impact:** Low risk – impact of this change is an increase in integrity of audit function.

**Implementation Date:**

This change will be implemented immediately upon approval by the FPKIPA and incorporation into the Federal Bridge Certificate Policy.

**Prerequisites for Adoption:**

There are no prerequisites.

**Plan to Meet Prerequisites:**

There are no prerequisites.

**Approval and Coordination Dates:**

Date presented to CPWG: 3 April 2008

Date presented to FPKI PA: 8 April 2008

Date of approval by FPKI PA: 25 July 2008