



FBCA Policy Change Proposal Number: 2008-04

To: Federal PKI Policy Authority
From: Certificate Policy Working Group
Subject: Proposed modifications to the US FBCA Certificate Policy
Date: 14 October 2008
Title: § 1.2 Document Identification

Version and Date of Document Requested to be changed:

X.509 Certificate Policy for the Federal Bridge Certificate Authority, Version 2.9, August 13, 2008

Change Advocate's Contact Information:

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Organization requesting change: CPWG

Change summary: Clarification of authorization to establish a high assurance certification authority

Background: In reviewing applications for cross certification with the FBCA from two commercial providers, it was noted that both had applied for cross certification at the High Assurance level. This, in turn, identified discrepancies and ambiguities in the wording between the FBCA Certificate Policy, the text of the Criteria and Methodology document, and the Cross Certification Application Template. Before proceeding with consideration of these applications, it is necessary to clarify and standardize the wording of these three documents regarding what entities may operate a High Assurance CA, under what circumstances, and in accordance with what requirements.

The FPKIPA's intent has always been to reserve High Assurance for U.S. Federal government CA use, and to impose the most stringent requirements, including U.S. citizenship for trusted roles, on the operations, security, and infrastructure of the CAs. The operation of High Assurance CAs by non-Federal entities, including commercial shared service providers, is inconsistent with this intent. This restriction does not preclude the issuance of Medium Hardware Assurance certificates that also satisfy eAuthentication Level 4 requirements (e.g., FRAC) for state, local, and tribal government CA use or issuance by commercial shared service providers.

Specific Changes: Specific changes are made to the following section and document as appropriate:

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

FBCA CP, Section 1.2, Document Identification

The High Assurance policy is reserved for U.S. Federal government entity PKI operation and use.

This change will also necessitate changes to the Criteria and Methodology document as follows:

Criteria and Methodology, Section 2.2, “Step 2: Documentation Submission” (second bullet):

Identification of which of the Applicant’s PKI’s Certificate Policies are to be considered for cross certification at which assurance levels. NOTE: Cross Certification at FBCA High Assurance level is only authorized for U.S. Federal government entity PKIs.

Criteria and Methodology, Appendix A, Cross Certification Application Template, table “Desired Federal PKI Cross Certification Level(s):

C4CA	FBCA Medium Hardware
FBCA Rudimentary	FBCA High (<u>for U.S. Federal government entities only</u>)
FBCA Basic	FBCA Medium Commercial Best Practices
FBCA Medium	FBCA Medium Hardware Commercial Best Practices

Estimated Cost:

No cost to the Federal Bridge CA.

Risk/Impact: Low risk – impact of this change is an increase in reliability of the cross certification review function and the integrity of the High Assurance certification level.

Implementation Date:

This change will be implemented immediately upon approval by the FPKIPA.

Prerequisites for Adoption:

There are no prerequisites.

Plan to Meet Prerequisites:

There are no prerequisites.

Approval and Coordination Dates:

Date presented to CPWG: 15 July 2008
Date presented to FPKIPA: 14 October 2008
Date of approval by FPKIPA: 14 October 2008