



**FBCA Policy Change Proposal Number: 2009-01**

**To:** Federal PKI Policy Authority  
**From:** FPKI Certificate Policy Working Group  
**Subject:** Proposed modification to the FBCA CP  
**Date:** 8 January 2009

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**Title:** Change to the FBCA CP to remove the requirement for backing up the archive

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

X.509 Certificate Policy for Federal Bridge Certificate Authority (FBCA), Version 2.11, November 20, 2008

**Change Advocates Contact Information:**

Judith Spencer, GSA  
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**Organization requesting change:** GSA

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**Background:** The CPWG has received numerous complaints from the cross-certified entities and applicants regarding the requirement in Section 5.5.4 to backup the archive. In practice, the archive is not backed up by the FPKI Management Authority, nor must it be backed up by the cross-certified entities. This is an erroneous requirement unless specified by the cross-certified entity's own certificate policy.

**Change summary:** This Change Proposal would eliminate the current text in Section 5.5.4: Archive Backup Procedures, and add an optional clause.

**Specific Changes:** This Change Proposal would eliminate Section 5.5.4., as shown below. Text with ~~strikethrough~~ will be removed. Underlined text will be added.

**5.5.4 Archive Backup Procedures**

~~The CPS or a referenced document shall describe how archive records are backed up, and how the archive backups are managed.~~ If a cross-certified entity chooses to back up its archive records, the CPS or a referenced document shall describe how the records are backed up and managed.

**Estimated Cost:**

There is no financial cost associated with implementing this change.

**Implementation Date:**

This change will be implemented immediately upon approval by the FPKIPA and incorporation into the FBCA CP.

**Prerequisites for Adoption:**

There are no prerequisites.

**Plan to Meet Prerequisites:**

There are no prerequisites.

**Approval and Coordination Dates:**

Date presented to CPWG: January 8, 2009

Date presented to FPKI PA: January 13, 2009

Date of approval by FPKI PA: February 10, 2009