Title: Change to FBCA CP to clarify CMS requirements


Change Advocate’s Contact Information:
Name: Deb Gallagher
Organization: GSA
Telephone number: 202-604-5733
E-mail address: deborah.gallagher@gsa.gov

Organization requesting change: FPKI Certificate Policy Working Group

Change summary: This change proposal provides a clarification on Rules for Role Separation for Trusted Roles operating the CMS.

Background:
CertiPath recently conducted a certificate policy mapping analysis of the CertiPath Bridge CA CP against the FBCA CP and found a number of issues. These issues were discussed at FPKI CPWG meetings in November and December 2010 and it was agreed that change proposals were required for any unresolved issues.

Specific Changes:

Insertions are underlined, deletions are in strikethrough:

APPENDIX B – CARD MANAGEMENT SYSTEM REQUIREMENTS

Individual personnel shall be specifically designated to the four Trusted Roles defined in Section 5.2.1. Trusted Role eligibility and Rules for separation of duties follow the requirements for Medium assurance in Section 5.
**Estimated Cost:**
There is no cost expected for Federal Agencies.

**Implementation Date:**
This change will be effective immediately upon approval by the FPKIPA and incorporation into the FBCA CP.

**Prerequisites for Adoption:**
There are no prerequisites.

**Plan to Meet Prerequisites:**
Not Applicable.

**Approval and Coordination Dates:**
- Date presented to CPWG: February 15, 2011
- Date presented to FPKIPA: February 15, 2011
- Date of approval by FPKIPA: February 24, 2011