FBCA Certificate Policy Change Proposal Number: 2010-05

To: Federal PKI Policy Authority
From: Certificate Policy Working Group
Subject: Proposed modifications to the Federal Bridge Certificate Policy
Date: 5 August 2010
Title: Addition of the Real ID credential for States to use in meeting FPKI Identity Proofing requirements

Version and Date of Certificate Policy Requested to be changed:

Change Advocate’s Contact Information:
Name: Judith Spencer
Organization: GSA
Telephone number: 202-236-0328
E-mail address: Judith.Spencer@gsa.gov

Organization requesting change: Federal PKI Policy Authority

Change summary: This change proposal adds a Real I.D. Act compliant Picture I.D. to the list of required credentials for use by States in seeking cross-certification with the Federal Bridge

Background: Many states have implemented the Real ID Act compliant Picture I.D. and are asking the Federal Government PKI Policy Authority to accept it as an alternative means of identification.

Specific Changes: Specific changes are made to the following sections: 3.2.3.1 Authentication of Human Subscribers (Table, Medium). Insertions are underlined, deletions are in strikethrough:
3.2.3.1 Authentication of Human Subscribers

Modify the table in 3.2.3.1 (Medium) as follows:

<table>
<thead>
<tr>
<th>Assurance Level</th>
<th>Identification Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium (all policies)</td>
<td>Identity shall be established by in-person proofing before the Registration Authority, Trusted Agent or an entity certified by a State or Federal Entity as being authorized to confirm identities; information provided shall be verified to ensure legitimacy. A trust relationship between the Trusted Agent and the applicant which is based on an in-person antecedent may suffice as meeting the in-person identity proofing requirement. Credentials required are either one Federal Government-issued Picture I.D., one REAL ID Act compliant picture ID(^1), or two Non-Federal Government I.D.s, one of which shall be a photo I.D. (e.g., Non-REAL ID Act compliant Drivers License). Any credentials presented must be unexpired. Clarity on the trust relationship between the Trusted Agent and the applicant, which is based on an in-person antecedent identity proofing event, can be found in the “FBCA Supplementary Antecedent, In-Person Definition” document. […]</td>
</tr>
</tbody>
</table>

Estimated Cost:

No cost to the Federal Bridge CA.

Risk/Impact:

Adoption of this Change Proposal involves an acceptable level of risk to the Federal Government. The impact is that State credentials which hitherto have been too heterogeneous to be defined by policy are now accepted for Identity Proofing provided they are compliant with the Real I.D. Act.

Implementation Date:

This change will be implemented immediately upon approval by the FPKIPA and incorporation into the FBCA 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: 5 August 2010
Date presented to FPKIPA: 10 August 2010
Date of approval by FPKIPA: TBD

\(^1\) REAL ID Act compliant IDs are identified by the presence of the DHS REAL ID star