



FBCA Policy Change Proposal Number: 2007-04

To: Federal PKI Policy Authority
From: Certificate Policy Working Group
Subject: Proposed modifications to the Federal Bridge Certificate Policy
Date: July 17, 2007
Title: Citizenship/Security Clearance Policy

Version and Date of Certificate Policy Requested to be changed:

X.509 Certificate Policy for the Federal Bridge Certificate Policy Version 2.5, July 12, 2007.

Change Advocate's Contact Information:

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Organization requesting change: Federal PKI Policy Authority

Change summary:

This Change Proposal requests that the FBCA CP (Medium and Medium Hardware) be modified to allow security clearances comparable to US secret or higher, issued by nations that are members of NATO or other friendly nations, as defined in the International Traffic in Arms Regulation (ITAR) – 22 CFR 120.32, to be accepted in lieu of citizenship requirements. The existing language requires persons performing trusted roles on behalf of intergovernmental organization PKIs have to be a citizen of the country in which the CA is located. This language violates EU statutory language and therefore is not acceptable to members of the European Community, CertiPath and its European customers (AIRBUS/EADS), who have a requirement to communicate with DoD using certificates at the Medium and Medium Hardware Levels of Assurance, not the CBP alternatives.

Background:

Over the past three months (since March 9, 2007), the FPKIPA Chair, FICC Chair and DoD representatives have been meeting with the aerospace industry (CertiPath, its European customers, AIRBUS/EADS), to discuss the aerospace industry's requirement that we revise the language in the FBCA CP. CertiPath has found that being cross-certified at the CBP level of assurance may not be acceptable to some Federal partners, with whom it needs to exchange certificates. They proposed that the FPKIPA accept, instead of citizenship, a security clearance issued by a nation that is a NATO member or whose security clearances are otherwise accepted

by the US Government. The U.S. Government has reciprocal security trust relationships with a number of nations within NATO and without – Australia, for example. In addition, there is a requirement to change the FBCA CP citizenship requirement to accommodate members of the EU, e.g., CertiPath's European customers, who cannot discriminate in hiring on the basis of nationality of member countries, according to EU legislation.

A teleconference was held on May 4, 2007 to try to develop a US position on this request, but had very limited representation. After that meeting, members of the FPKIPA were encouraged to participate in the next meeting, May 10, 2007. At that meeting, the aerospace community and DoD hammered out language that is contained in this change proposal. This draft revised language was communicated to the FPKIPA by Dr. Peter Alterman in an e-mail of May 10, 2007, with the stipulation that this would be presented to the CPWG as a Change Proposal for their review and concurrence. The proposed change would amend the FBCA CP language to permit security clearances (equivalent to US Secret or higher) to be used in lieu of citizen requirements for trusted roles for PKIs operated at Medium or Medium Hardware Levels of Assurance. The next step is to present the Change Proposal to the FPKIPA for formal discussion and vote.

Specific Changes: Specific changes are made to the following section: 5.3.1.

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

5.3.1. Background, Qualifications, Experience & Security Clearance Requirements

Each Entity shall identify at least one individual or group responsible and accountable for the operation of each CA in that Entity. For the FBCA, these are the Federal PKI Policy Authority and the FPKI Operational Authority.

All persons filling trusted roles shall be selected on the basis of loyalty, trustworthiness, and integrity. For the FBCA and Federal Agency PKIs, regardless of the assurance level, and for state and local government PKIs operated in the U.S. at High Assurance, all trusted roles are required to be held by U.S. citizens. For PKIs operated at Medium Assurance and Medium Hardware, ~~all trusted roles must be held by citizens of the country where the CA is located~~ each person filling a trusted role must satisfy at least one of the following:

- The person shall be a citizen of the country where the CA is located; or
- For PKIs operated on behalf of multinational governmental organizations, the person shall be a citizen of one of the member countries; or
- For PKIs located within the European Union, the person shall be a citizen of one of the member States of the European Union; or
- For PKIs other than the FBCA and Federal Agency PKIs, the person shall have a security clearance equivalent to U.S. Secret or higher issued by a NATO member nation or major non-NATO ally as defined by the International Traffic in Arms Regulation (ITAR) – 22 CFR 120.32; or
- For RA personnel only, in addition to the above, the person may be a citizen of the country where the RA is located.

For PKIs, apart from the FBCA and Federal Agency PKIs, operated at Rudimentary, Basic, Medium-CBP and Medium Hardware-CBP, there is no citizenship requirement or security clearance specified.

Practice Note: For PKIs operated at Medium Assurance and Medium Hardware on behalf of multinational governmental organizations, all trusted roles must be held by citizens of the member countries.

~~Where an entity PKI operated at Medium or Medium Hardware Assurance is affiliated with RAs operated overseas, RA personnel holding trusted roles may be local citizens of the country where the RA is located or of the country where the CA is located.~~

FPKI Operational Authority personnel acting in trusted roles shall hold TOP SECRET security clearances.

Estimated Cost:

No cost to the FBCA or FBCA cross-certified entities.

Implementation Date:

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

Prerequisites for Adoption:

None

Plan to Meet Prerequisites:

N/A

Approval and Coordination Dates:

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| Date presented to CPWG: | 17 July 2007 |
| Date Presented to FPKI PA: | 14 August 2007 |
| Date of approval by FPKI PA: | |