



**FBCA Certificate Policy Change Proposal Number: 2010-06**

**To:** Federal PKI Policy Authority  
**From:** CPWG  
**Subject:** Proposed modifications to the Federal Bridge Certificate Policy  
**Date:** September 21, 2010  
**Title:** Digitally Signed Declaration of Identity

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

X.509 Certificate Policy for the Federal Bridge Certification Authority (FBCA), Version 2.18, dated 8/15/2010.

**Change Advocate's Contact Information:**

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**Organization requesting change:** CPWG

**Change summary:** The FBCA Certificate Policy (CP) requires a declaration of identity signed by the applicant using a handwritten signature and performed in the presence of the person performing the identity authentication, using the format set forth at 28 U.S.C. 1746 (declaration under penalty of perjury) or comparable procedure under local law [§3.2.3.1]. However, the FBCA CP also permits the use of the current signature key for routine re-keying, except that identity shall be established through initial registration process every three to nine years from the time of initial registration depending upon the assurance level of the certificate [§3.3.1].

**Background:** For Entities with widely dispersed Subscriber populations, the requirement for obtaining a handwritten signature can be unnecessary, and creates an undue financial, operational, and administrative burden in those situations when certificates are created and downloaded immediately following identity authentication. While the FBCA CP addresses delays in certificate generation by providing that, "For Medium and High Assurance, identity shall be established no more than 30 days before initial certificate issuance" [§3.2.3.1], it does not address situations of rapid turn-around, and forces Registration Authorities to maintain multiple records of signature for identity authentication and certificate issuance.

**Specific Changes:** Specific changes are made to the following sections:

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

### 3.2.3.1 Authentication of Human Subscribers

[...]

The FPKI Management Authority, Entity CAs and/or RAs shall record the information set forth below for issuance of each certificate:

- The identity of the person performing the identification;
- A signed declaration by that person that he or she verified the identity of the applicant as required using the format set forth at 28 U.S.C. 1746 (declaration under penalty of perjury) or comparable procedure under local law; The signature on the declaration may be either a handwritten or digital signature using a certificate that is of equal or higher level of assurance as the credential being issued;
- If in-person identity proofing is done, a unique identifying number(s) from the ID(s) of the applicant, or a facsimile of the ID(s);
- The date of the verification; and
- A declaration of identity signed by the applicant using a handwritten signature or appropriate digital signature (see Practice Note) and performed in the presence of the person performing the identity authentication, using the format set forth at 28 U.S.C. 1746 (declaration under penalty of perjury) or comparable procedure under local law.

Practice Note: In those cases in which the individual is in possession of a valid digital signature credential of equal or higher level of assurance or the signature certificate is generated immediately upon authentication of the applicant's identity, the applicant may sign the declaration of identity and certificate of acceptance using the digital credential. In the latter case, if the applicant fails to sign the declaration of identity then the certificate must be revoked.

**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:**

There are no prerequisites.

**Approval and Coordination Dates:**

Date presented to CPWG: August 5, 2010; August 17, 2010; September 21, 2010  
Date presented to FPKIPA: August 10, 2010; September 14, 2010; October 12, 2010  
Date of approval by FPKIPA: October 12, 2010