



FBCA CP Change Proposal Number: 2011-01

To: Federal PKI Policy Authority
From: FPKI Certificate Policy Working Group
Subject: Proposed modifications to the FBCA Certificate Policy
Date: January 18, 2011

Title: Protection of Subscriber Attribute Information

Version and Date of Certificate Policy Requested to be changed: X.509 Certificate Policy for the Federal Bridge Certification Authority (FBCA) Version 2.21, December 16, 2010.

Change Advocate's Contact Information:

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Organization requesting change: FPKI Certificate Policy Working Group

Change summary: This change proposal requires protection of subscriber information stored in PKI databases.

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.

One of the issues identified by CertiPath is that requirements for protection of subscriber information stored in PKI databases are not adequately specified.

Specific Changes:

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

4.1.2 Enrollment Process and Responsibilities

Add the following paragraph to the end of section 4.1.2:

If databases or other sources are used to confirm Subscriber attributes, then these sources and associated information sent to a CA shall require:

- When information is obtained through one or more information sources, an auditable chain of custody be in place.
- All data received be protected and securely exchanged in a confidential and tamper evident manner, and protected from unauthorized access.

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:	January 18, 2011
Date presented to FPKIPA:	January 20, 2011
Date of approval by FPKIPA:	January 20, 2011