



**FBCA Certificate Policy Change Proposal Number: 2015-01**

**To:** Federal PKI Policy Authority (FPKIPA)  
**From:** PKI Certificate Policy Working Group (CPWG)  
**Subject:** Proposed modifications to the FBCA Certificate Policy  
**Date:** 20 October 2015

---

**Title: Clarifying Assertion of Policies for Devices**

**Version and Date of Certificate Policy Requested to be changed:** X.509 Certificate Policy for the Federal Bridge Certification Authority (FBCA) Version 2.27, December 2, 2013

**Change Advocate's Contact Information:**

Name: Matt King  
Organization: CPWG  
Telephone number: 410-271-5624  
E-mail address: matthew.king@protiviti.com

**Organization requesting change:** FPKI Certificate Policy Working Group

**Change summary:** Clarifying Assertion of Policies for Devices

**Background:**

Currently, the FBCA CP has policies for Non-Person Entities (NPE) (e.g., Medium Device and Medium Device HW, but the CP still allows non-device policies to be asserted in certificates assigned to NPEs. This change proposal sets a deadline by which all certificates issued to NPEs, must only assert device policies. This change will help Relying Parties determine whether a certificate belongs to a human or an NPE.

**Specific Proposals**

**1.2 DOCUMENT IDENTIFICATION**

The requirements associated with the mediumDevice policy are identical to those defined for the Medium Assurance policy with the exception of identity proofing, re-key, and activation data. The requirements associated with the mediumDeviceHardware policy are identical to those defined for the Medium Hardware Assurance policy with the exception of identity proofing, re-key, and activation data. In this document, the term “device” is defined as a non-person entity (NPE), i.e., a hardware device or software application. The

use of the mediumDevice and mediumDeviceHardware policies are restricted to devices and systems. ~~However, this does not restrict certificates issued to non-person entities from asserting one or more other policies if all requirements for those policies are met.~~

End-Entity certificates issued to devices after October 1, 2016 shall assert policies mapped to FBCA Medium Device, Medium Device Hardware, or PIV-I Content Signing policies. All other policies defined in this document should be reserved for human subscribers when used in End-Entity certificates.

**Estimated Cost:**

There is a cost expected to implement this change.

**Implementation Date:**

This change will be effective immediately upon approval by the FPKIPA and incorporation into the FBCA Certificate Policy after the full review currently underway.

**Prerequisites for Adoption:**

CAs may need to add device OIDs to their policies to meet this requirement. CAs may map their device policies to the FBCA device policies and obtain a new cross-certificate from the FBCA.

**Plan to Meet Prerequisites:**

N/A.

**Approval and Coordination Dates:**

Date presented to CPWG:	18 October and 5 November 2015
Date presented to FPKIPA:	10 November 2015
Date of approval by FPKIPA:	25 November 2015