Telecert SHAKEN CPS

SHAKEN

Certification Practice Statement

1 Introduction

SSL Corp, operating under the trade name Telecert, has created the Telecert SHAKEN Public Key Infrastructure ("Telecert SHAKEN PKI"). This CPS lays out the standards and procedures for Telecert's certificate issuance services for the Telecert SHAKEN PKI, as well as the practices employed to adhere to the STI-PA SHAKEN Certificate Policy and other relevant policies.

This practice statement should be read together with the STI-PA Shaken Certificate Policy. Unless otherwise defined in 1.6 of this document, all terms and acronyms defined in the CP retain their meanings in this document.

The Telecert SHAKEN PKI complies with the latest version of the STI-PA guidelines for issuing SHAKEN certificates. In case of any inconsistency between this CPS and the STI-PA Certificate Policy and operational requirements, the applicable requirement or guideline document will prevail.

The Telecert SHAKEN CPS, and the Telecert's CP uses the Internet X.509 Public Key Infrastructure Certificate Policy and Certification Practices Framework (RFC 3647). In accordance with RFC 3647, this CPS is organized using numbered paragraphs. To preserve the outline specified by RFC 3647, items that do not currently apply to Telecert SHAKEN PKI have the statement "Not applicable" or "No stipulation".

This CPS applies to all entities and individuals utilizing Telecert SHAKEN certification services.

Other important documents also apply to Telecert SHAKEN certification services. These include public documents (such as agreements with Subscribers and other its customers, Relying Party agreements, and the Telecert privacy policy, and its terms of use) and private documents governing internal operations.

This CPS, related agreements, and Certificate policies referenced within this document are available online at https://www.telecert.com/repository/.

1.1 Overview

This document concentrates on the practices and policies that must be adhered to by STI Certification Authorities (STI-CAs) to be authorized by the STI-PA to serve as trusted STI-CAs in the SHAKEN ecosystem. Only entities that have been granted a valid STI-PA-issued SPC token, as

defined in [ATIS-1000074.v003], [ATIS-1000080.v005], and [ATIS-1000092.v002], are eligible to obtain a certificate.

These STI-CA practices and policies are controlled and defined by the Telecert Policy Management Authority (PMA) as authorized by the STI-GA.

1.2 Document Name and Identification

This document is the Telecert SHAKEN Certificate Practices Statement and was approved for publication by the Telecert Policy Management Authority (PMA).

The Telecert CPS serves as Telecert SHAKEN's PKI documentation and regulatory framework. It includes both the Certificate Policy and Certification Practice Statement for Telecert's operations.

This document is the CPS for the following Certification Authorities:

CA Type	CA Distinguished Name	Key pair type and parameters	SHA-256 Key Fingerprint	Validity Period
Root CA	C=US,ST=Texas,L=Houston,O=SSL Corporation,CN=Telecert SHAKEN Root CA ECC R1	Algorithm: EC Public Key (1.2.840.10045.2.1) Named Curve: Prime256v1 (1.2.840.10045.3.1.7)	77:1B:F8:EB:B0:A6:D8:FD:14:5E:58:FC:DB:13:4C:18:E4:03:27:6F:6A:ED:B6:F6:0B:D1:AE:45:34:AA:2C:A2	1 Nov 2023, 4:05 p.m. to 25 Oct 2048, 4:05 p.m.

Version Control

Version	Date	Information
1.0	**October 6, 2023**	PMA Approved Version
1.1	**November 2, 2023**	Updates per v1.4 of the SHAKEN CP

This version of the Telecert CPS has been assigned the following Object Identifier [OID]: 1.3.6.1.4.1.38064.1.2.1.1.1.

Subsequent revisions to this CPS will contain new OID extensions corresponding to the Telecert CPS version.

1.3 PKI Participants

The participants in the Telecert SHAKEN PKI model include STI-CAs, Subscribers, and Relying Parties. The Telecert Root CA is an offline CA that only issues certificates to intermediate or Issuing CAs. In the context of the Telecert SHAKEN PKI, SPs are the Subscribers and Relying parties.

1.3.1 Certification Authorities

This CPS applies to Telecert SHAKEN PKI.

1.3.2 Registration Authorities

Not Applicable. Registration Authorities are not part of the SHAKEN PKI model.

1.3.3 Subscribers

The Subscribers, or their designees, are the SPs that request end entity STI Certificates in order to sign a PASSporT (including SHAKEN [RFC 8588]) in the SIP [RFC 3261] Identity header field [RFC 8224], or intermediate STI Certificates to be used as the parent certificate of delegate certificates issued to VoIP Entities as specified in [ATIS-1000092.v002].

See also the definition of "Subscriber" in Section 1.6.1 Definitions.

1.3.4 Relying Parties

The relying parties are those parties that use a Subscriber's certificate to verify the authenticity of the calling party identity per the procedures defined in [RFC 8224], [ATIS-1000074.v003] and [ATIS-100092.v002].

See also the definition of "Relying Party" in Section 1.6.1 Definitions.

1.3.5 Other Participants

There are no other active participants in the Telecert SHAKEN PKI model.

1.4 Certificate Usage

1.4.1 Appropriate Certificate Usage

In accordance with Telecert's Subscriber Agreement and CPS, the use of Private Keys and Certificates by subscribers is regulated. These agreements specify that relying parties are restricted to employing end-entity Certificates solely for the authentication of caller metadata through the signing of SHAKEN PASSporTs, as outlined in [ATIS-1000074.v003], along with any other PASSporT extensions designated for use within the SHAKEN ecosystem. Subsequently, Relying Parties utilize the SHAKEN PASSporTs to verify the authenticity of the calling party within the SP's VoIP network, as described in [ATIS-1000074.v003].

The STI-GA acknowledges the recognition of the following additional PASSporT extensions: 'div' [ATIS1000085.v002], 'rph' [ATIS-1000078], and 'rcd' [ATIS-1000094]. These extensions are validated using end entity certificates within the Telecert SHAKEN PKI trust model. Meanwhile, intermediate STI Certificates within the same model are exclusively designated for signing delegate certificates issued by Subscribers to VoIP Entities, in accordance with [ATIS-1000092.v002]. Furthermore, non-revoked certificates may find application in handling certificate renewal or rekey requests.

1.4.2 Prohibited Certificate Uses

Any use other than described in Section 1.4.1, or outside of the SHAKEN eco-system, or not allowed by STI-GA policies are prohibited.

1.5 Policy Administration

1.5.1 Organization Administering the Document

This CPS document is maintained by the Telecert PMA.

1.5.2 Contact Person

The Telecert PMA can be contacted via the following methods:

- Mail: 3100 Richmond Ave, Suite 405, Houston, Texas 77098, USA
- Email: legal@ssl.com
- Phone: +1-877-775-7328
- Fax: +1-832-201-7706

Contact information for Certificate Problem Reports can be found at:
https://www.telecert.com/revoke/

1.5.3 Entity Determining CPS Suitability for the Policy

Compliance and suitability with the Telecert CPS is monitored and managed by the Telecert PMA, with reference to results and recommendations made by Qualified Auditors and Self-Audits Section 8.

1.5.4 CPS Approval Procedures

Telecert maintains consistent oversight of modifications to the SHAKEN Certificate Policy. When officially informed of a new SHAKEN CP publication, Telecert will present an updated CPS to the PMA within 45 days. After the revised CPS gains approval, all certificates issued by the Telecert PKI will align with the new CPS requirements within 90 days.

Regarding other alterations, the Telecert PMA employs a structured review process, updating the CPS solely upon approval from the Telecert PMA.

1.6 Definitions and Acronyms

For a list of common communications terms and definitions, please visit the ATIS Telecom Glossary, which is located at http://www.atis.org/glossary.

1.6.1 Definitions

The following provides some key definitions used in this document. Refer to IETF RFC 4949 for a complete Internet Security Glossary, as well as tutorial material for many of these terms.

(Digital) Certificate: Binds a public key to a Subject (e.g., the end-entity). A certificate document in the form of a digital data object (a data object used by a computer) to which is appended a computed digital signature value that depends on the data object. [RFC 4949]. See also STI Certificate.

Basic Constraints extension: The Basic Constraints extension identifies whether the subject of the certificate is a CA.

Certification Authority (CA): An entity that issues digital certificates (especially X.509 certificates) and vouches for the binding between the data items in a certificate. [RFC 4949].

Certificate Chain: See Certification Path.

Certification Path: A linked sequence of one or more public-key certificates, or one or more public-key certificates and one attribute certificate, that enables a certificate user to verify the signature on the last certificate in the path, and thus enables the user to obtain (from that last certificate) a certified public key, or certified attributes, of the system entity that is the subject of that last certificate. Synonym for Certificate Chain. [RFC 4949].

Certificate Policy (CP): A named set of rules that indicates the applicability of a certificate to a particular community and/or class of application with common security requirements. [RFC 3647].

Certification Practice Statement (CPS): A statement of the practices that a certification authority employs in issuing, managing, revoking, and renewing or re-keying certificates. [RFC 3647].

Certificate Revocation List (CRL): A data structure that enumerates digital certificates that have been invalidated by their issuer prior to when they were scheduled to expire. [RFC 4949].

CPS Summary (or CPS Abstract) - A subset of the provisions of a complete CPS that is made public by a CA. [RFC 3647].

Certificate Signing Request (CSR): A CSR is sent to a CA to get enrolled. A CSR contains a Public Key of the end-entity that is requesting the certificate.

Certificate Validation: An act or process by which a certificate user established that the assertions made by a certificate can be trusted. [RFC 4949].

Chain of Trust: Deprecated term referring to the chain of certificates to a Trust Anchor. Synonym for Certification Path or Certificate Chain. [RFC 4949].

Company Code: A unique four-character alphanumeric code (NXXX) assigned to all SPs [ATIS-0300251].

Delegate Certificate: A certificate whose parent certificate contains a TNAuthList extension, as defined in [RFC 9060] and [ATIS-1000092.v002].

End-Entity: An entity that participates in the Public Key Infrastructure (PKI). Usually a Server, Service, Router, or a Person. In the context of SHAKEN, it is the SP on behalf of the originating endpoint.

End Entity STI Certificate: An STI Certificate containing a Basic Constraints extension with a CA boolean set to false.

Fingerprint: A hash result ("key fingerprint") used to authenticate a public key or other data [RFC 4949].

Identity: Unless otherwise qualified, an identifier that unambiguously distinguishes an entity for authentication and other security and policy application purposes. In this report, a SPC is an example of the identity of one kind of participant in the certificate management process.

Intermediate STI Certificate: An STI Certificate containing a Basic Constrains extension with a CA boolean set to true.

Issuing CA: A Certification Authority that issues certificates to an End-Entity. In the context of SHAKEN, the Issuing CA must be subordinate to a trusted STI-CA or to an intermediate CA that is subordinate to a trusted STI-CA.

National/Regional Regulatory Authority (NRRA): A governmental entity responsible for the oversight/regulation of the telecommunication networks within a specific country or region. NOTE: Region is not intended to be a region within a country (e.g., a region is not a state within the US).

National/Regional Regulatory Oversight (NRRO): A governmental entity responsible for the oversight/regulation of the telecommunication networks within a specific country or region. Synonym for NRRA.

Online Certificate Status Protocol (OCSP): An Internet protocol used by a client to obtain the revocation status of a certificate from a server.

Policy Management Authority (PMA): A person, role, or organization within a PKI that is responsible for (a) creating or approving the content of the certificate policies and CPSs that are used in the PKI; (b) ensuring the administration of those policies; and (c) approving any cross-certification or interoperability agreements with STI-CAs external to the PKI and any related policy mappings. The PMA may also be the accreditor for the PKI as a whole or for some of its components or applications.

Private Key: In asymmetric cryptography, the private key is kept secret by the end-entity. The private key can be used for both encryption and decryption. [RFC 4949].

Public Key: The publicly disclosable component of a pair of cryptographic keys used for asymmetric cryptography. [RFC 4949].

Public Key Infrastructure (PKI): The set of hardware, software, personnel, policy, and procedures used by a CA to issue and manage certificates. [RFC 4949].

Relying party: A system entity relying on certificate-provided information, including another entity's public key value [RFC 5217]. Relying parties are those who use a Subscriber's certificate to authenticate the calling party's identity as specified in [RFC 8224], [ATIS-1000074.v003], and [ATIS-100092.v002].

Root CA: A CA that is directly trusted by an end-entity. See also Trust Anchor CA and Trusted CA. [RFC 4949].

Secure Telephone Identity (STI) Certificate: A certificate containing a TNAuthList extension as defined in [RFC 8226] and [ATIS-1000080.v005]. The TNAuthList contains a single SPC value that identifies the SHAKEN SP holding the certificate. All STI Certificates include the Basic Constraints extension.

Service Provider Code: In the context of this document, this term refers to any unique identifier that is allocated by a Regulatory and/or administrative entity to a SP. In the US and Canada this would be a Company Code as defined in [ATIS-0300251].

Service Provider Code (SPC) token: An authority token that can be used by a SHAKEN SP during the ACME certificate ordering process to demonstrate authority over the identity information contained in the TN Authorization List extension of the requested STI Certificate. The SPC token complies with the structure of the TNAuthList Authority Token defined by [draft-ietf-acme-authority-token-tnauthlist] and contains a single SPC in the "atc" claim. The SPC token also contains a CA boolean that authorizes the SHAKEN SP to obtain end entity STI Certificates (CA boolean false), or intermediate STI Certificates (CA boolean true).

Signature: Created by signing the message using the private key. It ensures the identity of the sender and the integrity of the data. [RFC 4949].

Subscriber: A SP that requests an end entity STI Certificate in order to sign a PASSporT (including SHAKEN [RFC 8588]) in the SIP [RFC 3261] Identity header field [RFC 8224], or requests an intermediate STI Certificate to be used as the parent certificate to delegate certificates issued to VoIP entities [ATIS-1000092.v002].

Telephone Identity: An identifier associated with an originator of a telephone call. In the context of the SHAKEN framework, this is a SIP identity (e.g., a SIP URI or a TEL URI) from which a telephone number can be derived.

Trust Anchor: An established point of trust (usually based on the authority of some person, office, or organization) from which a certificate user begins the validation of a certification

path. The combination of a trusted public key and the name of the entity to which the corresponding private key belongs. [RFC 4949].

Trust Anchor CA: A CA that is the subject of a trust anchor certificate or otherwise establishes a trust anchor key. See also Root CA and Trusted CA. [RFC 4949].

Trust Authority: An entity that manages a Trust List for use by one or more relying parties. [RFC 5217].

Trusted CA: A CA upon which a certificate user relies for issuing valid certificates; especially a CA that is used as a trust anchor CA. [RFC 4949].

Trusted Role: A role performed by a person who can introduce security problems if not carried out properly, whether accidentally or maliciously.

Trust List: A set of one or more trust anchors used by a relying party to explicitly trust one or more PKIs. [RFC 5217].

Trust Model: Describes how trust is distributed from Trust Anchors.

VoIP Entity: A non-STI-authorized end-user entity or another calling entity that acquires delegated telephone numbers from a TN Service Provider, for example, call centers, value-added service providers, and VoLTE subscribers.

1.6.2 Acronyms

Short Term	Explained Term
ACME	Automated Certificate Management Environment (Protocol)
ATIS	Alliance for Telecommunications Industry Solutions
CA	Certification Authority
CN	Common Name
CRL	Certificate Revocation List
CP	Certificate Policy
CPS	Certification Practice Statement
CR	Certificate Repository
CSR	Certificate Signing Request
DN	Distinguished Name
ECDSA	Elliptic Curve Digital Signature Algorithm
FCC	Federal Communications Commission
HTTPS	Hypertext Transfer Protocol, Secure
IETF	Internet Engineering Task Force

Short Term	Explained Term
JSON	JavaScript Object Notation
JWT	JSON Web Token
NNI	Network-to-Network Interface
OCN	Operating Company Number
OCSP	Online Certificate Status Protocol
PKI	Public Key Infrastructure
PKIX	Public Key Infrastructure for X.509 Certificates
PMA	Policy Management Authority
SHAKEN	Signature-based Handling of Asserted information using toKENs
SIP	Session Initiation Protocol
SKS	Secure Key Store
SP	Service Provider
SPC	Service Provider Code
SP-KMS	SP Key Management Server
STI	Secure Telephone Identity
STI-AS	Secure Telephone Identity Authentication Service
STI-CA	Secure Telephone Identity Certification Authority
STI-CR	Secure Telephone Identity Certificate Repository
STI-GA	Secure Telephone Identity Governance Authority
STI-PA	Secure Telephone Identity Policy Administrator
STI-VS	Secure Telephone Identity Verification Service
STIR	Secure Telephone Identity Revisited
TN	Telephone Number
URI	Uniform Resource Identifier
VoIP	Voice over Internet Protocol

1.7 References

At the time of publication, the editions indicated below were valid. All standards are subject to revision, and parties to agreements based on this Standard are encouraged to investigate the possibility of applying the most recent editions of the standards indicated below.

ATIS-1000074.v003, Signature-based Handling of Asserted Information using Tokens (SHAKEN).[1]

ATIS-1000080.v005, Signature-based Handling of Asserted Information using Tokens (SHAKEN): Governance Model and Certificate Management.[1]

ATIS-1000084.v003, Operational and Management Considerations for SHAKEN STI Certification Authorities and Policy Administrator.[1]

ATIS-1000092.v002, Signature-based Handling of Asserted Information using Tokens (SHAKEN): Delegate Certificates.[1]

ATIS-0300251.a.2020, Codes for Identification of Service Providers for Information Exchange.[1]

draft-ietf-acme-authority-token-tnauthlist, TNAuthList profile of ACME Authority Token.[2]

FIPS 140-2, Security Requirements for Cryptographic Modules.[3]

FIPS 186-4, Digital Signature Standard (DSS).[3]

NIST SP 800-88, Guidelines for Media Sanitization.[3]

NIST SP 800-147, BIOS Protection Guidelines.[3]

NIST SP 800-147B, BIOS Protection Guidelines for Servers.[3]

RFC 3261, SIP: Session Initiation Protocol.[2]

RFC 3647, Internet X.509 Public Key Infrastructure Certificate Policy and Certification Practices Framework.[2]

RFC 4949, Internet Security Glossary, Version 2.2.[2]

RFC 5217, Memorandum for Multi-Domain Public Key Infrastructure Interoperability.[2]

RFC 5280, Internet X.509 Public Key Infrastructure Certificate and Certificate Revocation List (CRL) Profile.[2]

RFC 5480, Elliptic Curve Cryptography Subject Public Key Information.[2]

RFC 5905, Network Time Protocol Version 4 (NTPv4).[2]

RFC 7159, The JavaScript Object Notation (JSON).[2]

RFC 7231, Hypertext Transfer Protocol (HTTP/1.1): Semantics and Content.[2]

RFC 7515, JSON Web Signatures (JWS).2 RFC 7516, JSON Web Algorithms (JWA).[2]

RFC 7517, JSON Web Key (JWK).[2]

RFC 7518, JSON Web Algorithm (JWA).[2]

RFC 7519, JSON Web Token (JWT).[2]

RFC 8224, Authenticated Identity Management in the Session Initiation Protocol.[2]

RFC 8226, Secure Telephone Identity Credentials: Certificates.[2]

RFC 8555, Automatic Certificate Management Environment (ACME).[2]

RFC 8588, Personal Assertion Token (PASSporT) Extension for Signature-based Handling of Asserted information using toKENs (SHAKEN).[2]

RFC 9060, STIR Certificate Delegation.[2]

X.501, ITU-T Recommendation X.501 (2005) | ISO/IEC 9594-2:2005, Information technology - Open Systems Interconnection The Directory: Models.[4]

[1.] This document is available from the Alliance for Telecommunications Industry Solutions (ATIS) at https://www.atis.org/docstore/

[2.] This document is available from the Internet Engineering Task Force (IETF) at: http://www.ietf.org.

[3.] This document is available from the National Institute of Standards and Technology (NIST) at: https://csrc.nist.gov/publications.

[4.] This document is available from the ITU-T at: http://www.itu.org.

2 Telecert SHAKEN PUBLICATION AND REPOSITORY RESPONSIBILITIES

In the SHAKEN ecosystem, the responsibility for publishing public certificates into a certificate repository (STI-CR) that is publicly accessible to all relying parties lies with the SP. As an STI-CA, Telecert does not maintain an STI-CR.

2.1 Public Repositories

Telecert has established a centralized repository that provides access to various documents pertaining to the company's policies and practices, such as the CP/CPS, agreements for Subscribers and Relying Parties, and root Certificates. The repository can be accessed through the following URL: https://www.telecert.com/repository/.

2.2 Publication of Certification Information

Telecert reminds all Subscribers that they are required to publish all end-entity certificates that they receive from an STI-CA via a publicly available certificate repository system (STI-CR). The

Subscriber shall ensure certificates are published in a repository accessible to all relying parties within the VoIP network for the validity period of the end entity certificate.

The Subscriber shall notify and provide the STI-PA with any revoked certificates that shall be placed on the CRL via the STI-PA UI. It is required that the certificate being revoked be uploaded as part of the revocation process.

2.3 Time or Frequency of Publication

The Subscriber is required to make any issued certificate publicly available within 24 hours of its issuance.

New or revised Telecert CPS, Terms of Service, Privacy Policy, and Subscriber Agreement are promptly accessible to the public, generally within seven days of receipt or approval. The Telecert PMA submits CPS documents for approval by the PMA on an annual basis, ensuring publication post-approval.

Newly created Telecert Root CA certificates are delivered to the STI-PA within 7 days of approval by the PMA and at least 1 week prior to the expiration of the current root being stored by the STI-PA for distribution to the SPs.

2.4 Access Controls on Repositories

Unrestricted access for reading is granted to the Telecert Policy and Legal Repository as well as the Subscriber's certificate repository (CTI-CR). However, access to writing is safeguarded through both logical and physical controls.

3 Telecert SHAKEN IDENTIFICATION AND AUTHENTICATION

The following sub-sections describe the procedures used to authenticate the identity and other attributes of an SP prior to issuing certificates to the SP. This includes Telecert's support for the Automated Certificate Management Environment (ACME) [RFC 8555] protocol, as well as the ACME extension for token authorization using the SPC as described in [ATIS-1000080.v005], [ATIS-1000092.v002] and[draft-ietf-acme-authority-tokentnauthlist]. The fingerprint in the SPC token is based on the public key associated with the SP's account ACME credentials.

3.1 Naming

3.1.1 Type of Names

Telecert Certificates must comply with the rules for naming and identification, which require assigning to each Subscriber a Distinguished Name (DN) that conforms to the ITU X.501 standard. Issuer and subject DNs shall include single country name (C), which shall be "US" for all certificates produced under this policy, single organizationName (O), and single commonName (CN) naming attributes. The organizationName and commonName values will meet all requirements in regulatory documents, [ATIS-100080.v005] and [ATIS-100092.v002].

Telecert may include the “serialNumber’ attribute to distinguish among successive instances of certificates issued to the same entity.

3.1.2 Need for Names to be Meaningful

Telecert’s issued certificates must have a unique, clear, and unequivocal Distinguished Name (DN), unless a product’s profile specifically dictates the use of an alternative naming methodology (refer to Section 7). In all other cases, Telecert will ensure that certificates utilize a meaningful, unambiguous, and unique Distinguished Name (DN).

3.1.3 Anonymity or Pseudonymity of Subscribers

Not applicable.

3.1.4 Rules for Interpreting Various Name Form

No stipulation.

3.1.5 Uniqueness of Name

The complete combination of Subject Attributes (Distinguished name) must be distinct within Telecert’s PKI. Unique elements/attributes of the certificate depend on the certificate type.

RDN	Value
Country	US
Organization	{Legal Name of Reporting Entity}
Common Name	SHAKEN {OCN}
Serial Number	{Unique string}

3.1.6 Recognition, Authentication, and Role of Trademarks

No additional stipulations.

3.2 Initial Identity Validation

Telecert supports the SHAKEN model for identification, which requires that an SP shall first register with the STI-PA and have a valid SPC token issued by the STI-PA in order to obtain certificates.

3.2.1 Method to Prove Possession of Private Key

To apply for a Telecert certificate, an Applicant is required to provide a Certificate Signing Request (CSR) to prove their ownership of the Private Key that corresponds to the Public Key to be included in the requested certificate. However, this requirement does not apply if Telecert generates a Key Pair on behalf of a Subscriber. In such cases, Telecert will take control of the Key Pairs as detailed in Section 6.2.1.

3.2.2 Authentication of Organization Identity

The certificate subject's distinguished name (DN) must include the Country (C) naming attribute along with other Subject Identity Information. Telecert is responsible for confirming the identity of the service provider (SP) and verifying the authenticity of the SP Applicant Representative's certificate request through a verification procedure outlined in the Telecert's CPS. At the very least, this process entails validating the SP and ensuring the possession of a valid SPC token.

Telecert will verify the legal existence, legal name, assumed name, legal form, and requested address of the organization, and confirm the authority of the requesting party. Any document used for these purposes shall be inspected by Telecert for any alteration or falsification.

Telecert allows Applicants to provide the FCC Form 499 Filer ID number of the organization they would like a certificate for. Telecert will use this information with the FCC Form 499 Filer Database to determine the following:

- Current registration by the Applicant with the FCC
- The full Legal Name of the Applicant Organization
- The Primary (Headquarters) Address of the Applicant Organization
- The CORESID of the Applicant Organization

Telecert will use the CORESID along with the FCC Registration Database to determine the email address of the registered contact at the Applicant Organization.

The Applicant Representative will be provided with a one-time use, short lived, cryptographically generated code that they must provide to the registered contact at the organization, out of band.

Telecert will then send an email registered organization contact notifying them that the applicant has requested the ability to acquire certificates on behalf of their organization. Included in the email will be a secure, unique link where the contact may enter the code provided to the applicant. Provided that the code is submitted within a set time period not to exceed 30 days, the applicant is approved to submit requests for certificates on behalf of the organization.

3.2.3 Authentication of Individual Identity

Telecert shall verify the Applicant's name and the authenticity of the certificate request.

Telecert SHALL verify:

- the Applicant's name using a legible copy, which discernibly shows the Applicant's face, of at least one currently valid government-issued photo ID (passport, drivers license, military ID, national ID, or equivalent document type). Telecert SHALL inspect the copy for any indication of alteration or falsification.

- the Applicant's address using a form of identification that the CA determines to be reliable, such as a government ID, utility bill, or bank or credit card statement. Telecert

MAY rely on the same government-issued ID that was used to verify the Applicant's name.

Telecert shall rely on strong identity proofing, based on a face to face meeting with the Applicant, or a procedure that provides an equivalent assurance. The latter may include any of the following:

- means of secure video communication;
- use of identity verification software/AI;
- hybrid or other methods.

After successful verification of the Applicant's identity, Telecert may then uses both the FCC Form 499 Filer Database and FCC Registration Database to verify the applicants affiliation with the organization. Alternatively, Telecert may contact the organization using already authenticated means of communication to verify the authority of the Applicant.

3.2.4 Non-verified Subscriber Information

Certificates shall not contain information that has not been verified.

3.2.5 Validation of Authority

Telecert is committed to verifying the authorization of all certificate requests. Telecert will perform ID verification on applicant representatives and verify their affiliation to the subject organization via industry-standard methods such as confirmation via Reliable Means of Communication, or confirmation via FCC Form 499 Filer Database and/or FCC Registration Database.

3.2.6 Criteria for Interoperation

No stipulation.

3.3 Identification and Authentication for Re-key Requests

Re-keying (sometimes called reissuing) refers to the creation of an entirely new certificate, using some or all of the information submitted for an existing certificate and using a newly generated Private Key. Subscribers may request re-keying of a Telecert certificate prior to the certificate's expiration. Subordinate CAs of Telecert may request re-keying of a certificate registered by them prior to the certificate's expiration.

3.3.1 Identification and Authentication for Routine Re-key

For re-key of any Subscriber certificate issued under this CPS, credentials may be established through use of current a signature key unless the certificate has been revoked (see Section 3.3.2). The credentials shall be established following the same procedures as the initial registration at least once every three (3) years from the time of the initial registration.

3.3.2 Identification and Authentication for Re-key after Revocation

If a Subscriber wants to re-key a Telecert certificate that has been previously revoked, they will need to follow all validation and authentication procedures required for a new certificate application.

3.4 Identification and Authentication for Revocation Requests

Telecert reserves the right to revoke any certificate issued within its PKI at its discretion. However, any revocation request must follow the identification and/or authorization procedures outlined in Section 4.9.3.

4 Telecert SHAKEN CERTIFICATE LIFE-CYCLE OPERATIONAL REQUIREMENTS

The chapter outlines the policy, procedures, and requirements necessary for managing Certificates throughout their entire life cycle.

4.1 Certification Application

4.1.1 Who Can Submit a Certificate Application

Applicants must have a valid SPC Token issued by the STI-PA in order to request certificates from Telecert. The SPC Token will serve as the means for verification. The SPs must have previously set up an account with the STI-PA and must provide a valid SPC token, as defined in [ATIS-1000080.v005] and [ATIS-1000092.v002], to prove that it is authorized to obtain STI Certificates.

Please note that Telecert will not issue Certificates to entities or organizations that appear on the United States' government denied list or are located in a country with which the laws of the United States prohibit doing business. Issuance will depend on proper validation and compliance with Telecert policies.

4.1.2 Enrollment Process and Responsibilities

Prior to the issuance of a certificate, Telecert shall obtain the following documentation from the Applicant:

1. A certificate request, which may be electronic; and
2. An executed Subscriber Agreement or Terms of Use, which may be electronic.

In particular, to obtain a Telecert certificate, the enrollment process should include the following steps:

- Submission of the certificate application
- Creation of a Key Pair using secure methods

- Delivery of the SPC Token and the Public Key of the Key Pair to Telecert
- Acceptance of the applicable Subscriber Agreement
- Payment of any applicable fees

Please note that the sequence of these events may differ based on the method used and the product ordered. Telecert will obtain any additional documentation and perform any other necessary steps to meet the requirements for the requested product.

For certificates issued with the ACME protocol, the procedures outlined in [ATIS-1000080.v005] and [ATIS-1000092.v002] shall be followed in order to create an account with Telecert.

4.2 Certification Application Processing

4.2.1 Performing Identification and Authentication Functions

The Certificate request should include all factual information about the Applicant that needs to be included in the Certificate, along with any additional information required by Telecert to comply with this CPS. If the Certificate request does not contain all the necessary information, Telecert will obtain the missing information either from the Applicant or a reliable, independent, third-party data source and confirm it with the Applicant.

Telecert has established systems and processes to authenticate the identity of every Applicant and adheres to documented procedures to verify all data requested by the Applicant for inclusion in the Certificate.

The procedures outlined in Chapter 3 shall be followed for the initial identity verification of the applicant and validation or the organizational identity. It is mandatory that successful validation is achieved through these identification and authentication procedures before issuing any certificate.

4.2.2 Approval or Rejection of Certificate Applications

Telecert will decline any certificate request with information that cannot be verified. Furthermore, Telecert reserves the right to refuse the request for any certificate that could harm, reduce, or otherwise negatively impact Telecert's business or reputation. Telecert has the sole discretion to determine what meets these criteria and is not obliged to provide any reason for refusing any Certificate Request.

4.2.3 Time to Process Certificate Applications

Telecert will handle certificate applications within a commercially reasonable timeframe. However, Telecert shall not be held responsible for any delays in application processing caused by the Applicant or the Applicant's agent, including the omission or provision of incorrect details and/or documentation in the application. Furthermore, Telecert shall not be responsible for any events outside of its control that delay application processing.

After validation of the applicant and the organization's identities, an account will be considered authorized. Once an account has been authorized, certificate requests will typically be processed within a few seconds, but such processes will not take more than 24 hours.

4.3 Certificate Issuance

In the case of STI-CAs that support the ACME protocol, the procedures for certificate issuance depend on the type of STI Certificate as follows:

- For issuing end entity STI Certificates, the procedures described in [ATIS- 1000080.v005] and [RFC 8555] shall be followed.
- For issuing intermediate STI Certificates, the procedures in [ATIS-1000092.v002] shall be followed.

For CP revisions that place new requirements on end-entity certificates, Telecert shall comply with the new requirements for all newly assigned certificates within 90 days of the approval of the revised CPS.

For certificates issued under a previous version of the CP, the new requirements will not need to be applied until 90 days after the effective date of the new CP and until those certificates are renewed or re-keyed.

4.3.1 STI-CA Actions During Certificate Issuance

Any RA, whether internal or external, utilizing Telecert's PKI, is obligated to validate all information provided before issuing any certificate.

Issuance of certificates by a Root CA necessitates an individual authorized by Telecert, such as the CA system operator, system officer, or PKI administrator, to deliberately issue a direct command, allowing the Root CA to perform a certificate signing operation.

4.3.2 Notification to Subscriber by the STI-CA of Issuance of Certificate

Any RA, whether internal or external, utilizing Telecert's PKI, is required to inform the Subscriber of the successful issuance of a certificate.

Notification shall be given via email, utilizing an email address provided by the Subscriber. Telecert may, at its sole discretion, provide notification by other means as required. Upon receiving notification, the Subscriber acknowledges that the certificate is available for review, access, and download from the Telecert Account Dashboard associated with the ordered certificate.

4.4 Certificate Acceptance

A url where the certificate can be downloaded is provided to the applicant at time of issuance.

4.4.1 Conduct Constituting Certificate Acceptance

After the certificate has been issued, both the applicant and the organization are referred to as the Subscriber. It is the responsibility of the Subscriber or Subscriber's agent to review and verify the information provided in the issued certificate.

The Subscriber or agent shall be considered to have accepted the certificate:

• Upon downloading, installing, or receiving the certificate through any other means

• Following a period of 30 (thirty) days from the time of fulfillment communication

4.4.2 Publication of the Certificate by the STI-CA

Telecert shall deliver any issued certificate to the email address associated with the Subscriber or the Subscriber's agent. The certificate may also be made available through alternative means, including:

• Publishing the certificate to the relevant Telecert Account

• Publishing the certificate to a publicly accessible repository, such as an x.509 or LDAP repository

• Publishing the certificate to other parties as necessary, in accordance with the Telecert PKI CP/CPS

4.4.3 Notification of Certificate Issuance by the STI-CA to Other Entities

No other entities shall be notified of issuance of the STI Certificates.

4.5 Key Pair Certificate Usage

4.5.1 Subscriber Private Key and Certificate Usage

Subscribers who use certificates issued through the Telecert PKI must ensure that the Private Key for the certificate is protected. This includes:

• Taking measures to secure the Private Key and any copies to prevent disclosure or compromise

• Using the Private Key and/or certificate only in accordance with the relevant terms of service and/or Subscriber Agreement

• Discontinuing use of the Private Key after the expiration or revocation of the associated certificate

• Informing the issuing entity if the Private Key is compromised

• Using the certificate only as applicable and for the intended purpose specified in the key usage field of the certificate.

4.5.2 Relying Party Public Key and Certificate Usage

Any SP that receives a SIP Identity header field with a STI Certificate signed PASSporT must verify the information. Before using the STI public key certificate, the SP shall perform digital signature per procedures defined in [ATIS-1000074.v003] and [ATIS-1000092.v002], as well as ensure that the certificate was issued by a STI-CA that is on the list of Trusted Root CAs, as provided by the STI-PA, and the certificate is not included in the CRL. The Relying Party shall ensure that the list of Trusted Root CAs has not expired; i.e., is up to date. If it has expired, they shall retrieve the current list from the STI-PA.

4.6 Certificate Renewal

In the context of this CPS, the term "certificate renewal" refers to the issuance of a new certificate that preserves the same Public Key and all other information from the original certificate, with the sole exceptions of the notBefore and notAfter fields, which indicate the renewal date.

In the case of the ACME protocol, the Subscriber initiates a request for a new certificate. Telecert shall not initiate the process to renew or issue a new certificate on behalf of the Subscriber. The process for renewal follows that of certificate issuance per Sections 4.2 through 4.4.

In the case of non-ACME renewals:

- Renewal of a certificate issued utilizing the Telecert PKI may be requested by the Subscriber or the Subscriber's agent. Subscribers with Certificates issued directly by Telecert may request renewal via their Telecert Account Dashboard.
- Any RA, internal or external, utilizing the Telecert PKI shall require a specific request for renewal.
- Certificates issued by any entity utilizing the SSL.com PKI shall not be automatically renewed.
- Renewal requests shall require validation and/or authentication identical to that for a new certificate.
- Any certificate slated for renewal shall re-use all information in the original request, with the sole exception of the expiration date (the notAfter field).
- Any certificate slated for renewal which for any reason fails re-verification and/or re-authentication of the certificate shall not be renewed.

4.6.1 Circumstance for Certificate Renewal

Unless prohibited in this CPS, certificates issued using Telecert PKI may be renewed if the following conditions are met:

• The original certificate has not been revoked or flagged

• The Public Key from the original certificate has not been blocked

• The Private Key corresponding to the original certificate has not been compromised

• The key lifetime is not exceeded as per Section 6.3.2

• All information, except the notAfter field, in the certificate remains accurate

• The cryptographic security of the renewed certificate is deemed sufficient for its intended lifetime

• The information provided in the renewal request still passes the validation checks

• No additional validation is required beyond the steps performed during the original issuance

Certificates that have previously been renewed or re-keyed may also be renewed, provided that the criteria mentioned above are satisfied. After renewal, the original certificate may be revoked at Telecert or the authorized entity's discretion. The original certificate cannot be further renewed, re-keyed, or modified, regardless of its revocation status.

4.6.2 Who May Request Renewal

A Subscriber that is the holder of the expiring certificate, or their authorized representative, may request the renewal of a certificate issued through the Telecert PKI. For Subscribers who have received certificates directly from Telecert, renewal can be requested through their Telecert Account Dashboard. Certificates issued by any party using the Telecert PKI will not be renewed automatically.

4.6.3 Processing Certificate Renewal Requests

Validation and/or authentication procedures identical to those required for a new certificate will be necessary for renewal requests. Subscribers holding Certificates issued directly by Telecert may request renewal through their Telecert Account Dashboard. When renewing a certificate, all Subject DN information from the original request will be reused, except for the start date (the notBefore field) and the expiration date (the notAfter field). If a certificate slated for renewal fails the re-verification and/or re-authentication process for any reason, it will not be renewed.

4.6.4 Notification of New Certificate Issuance to Subscriber

The process shall follow that described in Section 4.3.2.

4.6.5 Conduct Constituting Acceptance of a Renewal Certificate

The process shall follow that described in Section 4.4.1.

4.6.6 Publication of the Renewal Certificate by the STI-CA

The process shall follow that described in Section 4.4.2.

4.6.7 Notification of Certificate Issuance by the STI-CA to Other Entities

The process shall follow that described in Section 4.4.3. No other entities shall be notified of certificate issuance.

4.7 Certificate Re-key

In this CPS document, "certificate re-keying" refers to the issuance of a new certificate that employs a different Key Pair.

4.7.1 Circumstance for Certificate Re-key

Re-key of a certificate must only be performed when required, based on:

1. Knowledge or suspicion of compromise or loss of the associated private key; or
2. The expiration of the cryptographic lifetime of the associated key pair.

Telecert or SP may perform the certificate re-key operation for other reasons (e.g., an SP could choose to always re-key its short-lived certificates). Information on maximum key lifetimes can be found in Section 6.3.2. Telecert's re-key operation requires the reissuance of all certificates issued by the re-keyed entity. It must be performed only when necessary and in a way that preserves the capability of Relying Parties to validate certificates whose validation path includes the re-keyed entity.

If the re-key is based on a suspected compromise, then the previous certificates shall be revoked per the procedures in Section 4.9.

4.7.2 Who May Request Certification of a New Public Key

The Subscriber or their authorized representative may request the re-keying of a certificate issued through the Telecert PKI. Subscribers who have been issued Certificates directly by Telecert can request re-keying directly through their Telecert Account Dashboard.

4.7.3 Processing Certificate Re-keying Request

To request re-keying, a new CSR must be provided. Any certificate that is to be re-keyed may be re-issued using some or all of the information in the initial request, with the exception of the Public Key and the date of issuance (the validFrom field). Other changes to the information may be made in the re-key request, as requested by the Subscriber or the Authorized Entity. Re-keying requests must be validated and/or authenticated, as outlined in Section 4.2. If a certificate submitted for re-keying fails verification and/or authentication for any reason, it will not be issued.

4.7.4 Notification of New Certificate Issuance to Subscriber

Any certificate re-keyed via the Telecert PKI shall utilize a notification method which is in compliance with Section 4.4.2.

4.7.5 Conduct Constituting Acceptance of a Re-keyed Certificate

Acceptance of any certificate re-keyed via the Telecert PKI shall use the same methods described for a new certificate in Section 4.4.1.

4.7.6 Publication of the Re-keyed Certificate by the STI-CA

Any certificate re-keyed via the Telecert PKI may be published via email to the Subscriber using the same methods described for a new certificate in Section 4.4.2.

4.7.7 Notification of Certificate Issuance by the STI-CA to Other Entities

Notification to other entities may also be performed for any re-keyed certificate using the same methods as described in Section 4.4.3

4.8 Certificate Modification

Subscriber certificates must not be modified. If certificate information is not correct, then a new certificate must be requested. For example, if the Subscriber name changes, then the Subscriber shall undergo the initial registration process again with the STI-CA and then follow the procedures described in Sections 4.2 through 4.4. The previous certificate must be revoked and follow the procedures in Section 4.9.

4.8.1 Circumstance for Certificate Modification

Not applicable.

4.8.2 Who May Request Certificate Modification

Not applicable.

4.8.3 Processing Certificate Modification Requests

Not applicable.

4.8.4 Notification of New Certificate Issuance to Subscriber

Not applicable.

4.8.5 Conduct Constituting Acceptance of Modified Certificate

Not applicable.

4.8.6 Publication of the Modified Certificate by the STI-CA

Not applicable.

4.8.7 Notification of Certificate Issuance by the STI-CA to Other Entities

Not applicable.

4.9 Certificate Revocation and Suspension

The Telecert CPS defines “revocation” as the addition of the serial number of a certificate issued via the Telecert PKI to a Certificate Revocation List (CRL), an Online Certificate Status Protocol (OSCP), and any other relevant database that is used for blocklisting, as described in [ATIS-1000080.v005].

Telecert is responsible for verifying all revocation requests. Certificates eligible for inclusion in the Telecert managed CRL encompass end-entity or intermediate certificates authorized through SPC tokens or approved Telecert’s intermediate STI Certificates. Delegate Certificates generated following the procedures outlined in [ATIS-1000092.v002] are exempt from inclusion in the Telecert’s CRL.

4.9.1 Circumstances for Revocation

Each new entry in the Certificate Revocation List (CRL) must include the RFC 5280 revocation reason code (CRLReason), as specified by this section, except when the CRLReason is “unspecified (0)”. The CRL may only contain the following CRLReasons:

• keyCompromise (RFC 5280 CRLReason #1);

• privilegeWithdrawn (RFC 5280 CRLReason #9);

• cessationOfOperation (RFC 5280 CRLReason #5);

• affiliationChanged (RFC 5280 CRLReason #3); or

• superseded (RFC 5280 CRLReason #4).

CAs are required to inform Subscribers of revocation reasons, except for “privilegeWithdrawn,” and provide tools that allow Subscribers to easily specify these options when requesting revocation. The default value for the revocation reason should be “unspecified (0).” Telecert will initiate the revocation process within 24 hours if one or more of the following criteria are met:

1. The Subscriber submits a written request to revoke the Certificate for any of the following reasons:

• keyCompromise (RFC 5280 CRLReason #1) - when the Subscriber’s Private Key is suspected of compromise;

• cessationOfOperation (RFC 5280 CRLReason #5) - when the Subscriber discontinues their website and will no longer be using the Certificate;

• affiliationChanged (RFC 5280 CRLReason #3) - when identifying information about the Subscriber in the Certificate has changed;

• superseded (RFC 5280 CRLReason #4) - when the Subscriber requests a new certificate to replace an existing certificate.

In order to begin the revocation process for a Subscriber certificate, Telecert must receive a request from the Subscriber in writing, or there must be evidence of a potential compromise or invalidation of the certificate. Telecert will revoke a certificate if:

1. The Subscriber requests revocation due to Key Compromise and can demonstrate possession of the associated Private Key. If the Subscriber cannot demonstrate possession of the associated Private Key, Telecert MAY revoke all certificates associated with that Subscriber that contain that Public Key, and MAY block issuance of future certificates with that key;

2. The Subscriber notifies Telecert that the original certificate request was not authorized and does not retroactively grant authorization (CRLReason #9, privilegeWithdrawn);

3. Telecert receives evidence that the Subscriber's Private Key corresponding to the Public Key in the Certificate has been compromised (CRLReason #1, keyCompromise);

4. Telecert becomes aware of a proven method that can easily compute the Subscriber's Private Key based on the Public Key in the Certificate, such as a Debian weak key (CRLReason #1, keyCompromise);

5. Telecert receives evidence that the validation of domain authorization or control for any Fully-Qualified Domain Name or IP address in the Certificate should not be relied upon (CRLReason #4, superseded or CRLReason #9, privilegeWithdrawn).

4.9.2 Who Can Request Revocation

A certificate revocation can be initiated by a Subscriber with the appropriate authorization. Furthermore, a third party (such as STIGA, FCC, or other regulatory bodies specified in the policies) also holds the authority to revoke a certificate. When needed, the STI-CA can request the revocation of an end-entity or intermediate certificate it issued through the STI-PA.

4.9.3 Procedure for Revocation Request

Revocation of a certificate issued via the Telecert PKI may be initiated by the Subscriber or their authorized agent, by submitting a request to the appropriate RA (internal or external). Telecert may allow other approved methods of communication for revocation requests, as long as corresponding account credentials are adequately provided.

Telecert will maintain a continuous ability to accept and respond to revocation requests and Certificate Problem Reports, 24 hours a day, 7 days a week.

An authorized third party requesting a certificate revocation (see Section 4.9.2 for the list of such requesters) must submit a request for revocation of an end entity or intermediate certificate to the STI-PA by providing a certificate to be placed on the CRL.

4.9.4 Revocation Request Grace Period

There is no grace period for revocation requests. A request for revocation must be made as soon as circumstances requiring revocation have been confirmed. Once a certificate has been

identified and the revocation requester has been verified, the STI-PA shall revoke the certificate immediately by adding it to the CRL.

4.9.5 Time within which the Revocation Request must be Processed

The expected revocation timing is guided by the process per Section 4.9.4 and the revocation requestor. The timing shall consider the process of notifying the STI-PA.

4.9.6 Revocation Checking Requirement for Relying Parties

Relying parties shall acquire and check the CRL, which is managed by the STI-PA, when the Relying Party validates a certificate.

4.9.7 CRL Issuance Frequency (If Applicable)

The STI-PA maintains the CRL and updates the CRL and makes it available within a 24-hour timeframe.

4.9.8 Maximum Latency for CRLs (If Applicable)

Not applicable.

4.9.9 Online Revocation/Status Checking Availability

Not Applicable. Telecert does not provide revocation status checking capability. Instead a URL to the CRL maintained by the STI-PA is included in the 'cRLDistributionPointName' field in the issued certificate. The Relying Party accesses the list via an HTTPS interface as described in [ATIS-1000080.v005].

4.9.10 Online Revocation Checking Requirements

The Telecert SHAKEN PKI does not make provisions for the support of certificate status services such as Online Certificate Status Protocol (OCSP). The Telecert SHAKEN PKI defines an indirect CRL model in which the Subscribers can provide any revoked end-entity or intermediate certificates and STI-CAs provide any revoked intermediate certificates to the STI-PA for inclusion in the CRL. The URL to the CRL is included in the SPC token provided by the STI-PA. The STI-CA includes the URL from the token in the 'cRLDistributionPointName' field in the end entity certificate so that during path validation, the Relying Party can check whether the end entity certificate or any intermediate certificate in the certification path have been revoked.

4.9.11 Other Forms of Revocation Advertisements Available

Not applicable.

4.9.12 Special Requirements Re-key Compromise

Not applicable.

4.9.13 Circumstances for Suspension

The Telecert PKI does not support Certificate suspension.

4.9.14 Who Can Request Suspension

Not applicable.

4.9.15 Procedure for Suspension Request

Not applicable.

4.9.16 Limits on Suspension Period

Not applicable.

4.10 Certificate Status Services

The Telecert SHAKEN PKI does not support certificate status services such as OCSP.

4.10.1 Operational Characteristics

Not applicable.

4.10.2 Service Availability

Not applicable.

4.10.3 Optional Features

Not applicable.

4.11 End of Subscription

Subscribers are provided with two choices for concluding a certificate subscription. A certificate subscription will be considered terminated under the following circumstances:

1. The certificate is revoked before the date indicated in the validTo field.
2. The certificate reaches its validTo date and naturally expires.

Either of these options will result in the termination of the subscription. Telecert, or the relevant Authorized Third Party or Enterprise Registration Authority (RA), is responsible for notifying Subscribers regarding the requirement for certificate renewal prior to its expiration. These notifications can be conveniently set up through the Subscriber's Telecert Account.

4.12 Key Escrow and Recovery

The Telecert PKI does not support key escrow.

4.12.1 Key Escrow and Recovery Policy and Practices

The Telecert PKI does not support key escrow.

4.12.2 Session Key Encapsulation and Recovery Policy and Practices

The Telecert PKI does not support key escrow.

5 Telecert SHAKEN FACILITY, MANAGEMENT, AND OPERATIONAL CONTROLS

This Section describes the technical and administrative security controls used by Telecert for key generation, subject authentication, certificate issuance, certificate revocation, auditing, and archiving.

5.1 Physical Security Controls

As described in the following subsections, Telecert maintains security controls for all facilities hosting Telecert operations, including those that are not under the direct control of Telecert.

5.1.1 Site Location and Construction

Telecert PKI Facilities are located in the United States, as are all copies of Telecert CA Private Keys. Telecert conducts its operations from a secure commercial datacenter. Secure areas within the datacenter encompass critical facilities, equipped with suitable security barriers and entry controls. These measures are implemented to safeguard against unauthorized access, damage, and any form of interference.

5.1.2 Physical Access

The equipment owned by Telecert is subject to stringent physical security measures to prevent unauthorized access. These measures include:

1. Two-factor access control, which requires both physical cards and biometric readers to gain entry.
2. 24-hour video surveillance to monitor and record all activities.
3. Continuous human security presence to ensure vigilant oversight and maintain logs of access.

Rooms dedicated to support and vetting, where Registration Authority (RA) functions take place, are secured with controlled access and keyed-lock doors. The building security system logs the usage of access cards for these areas. Additionally, video monitoring is implemented to record all entry and exit activities. It is imperative to note that unauthorized personnel seeking access to the secure datacenter or the RA operational area will never be left unsupervised, ensuring constant oversight by an authorized individual.

5.1.3 Power and Air Conditioning

The equipment utilized by Telecert is housed in a facility that employs uninterrupted power supply (UPS) units and automatic backup generators. These power sources ensure the availability of multiple redundant power options, guaranteeing continuous operation. Additionally, the heating, cooling, and ventilation (HVAC) systems within the facility are adequately designed to support the efficient functioning of the Certification Authority (CA) system.

5.1.4 Water Exposures

The equipment utilized by Telecert is located within a facility that offers safeguards against water-related incidents and exposures. Measures are in place to protect the equipment from any potential water damage.

5.1.5 Fire Prevention and Protection

The equipment used by Telecert is housed in a facility that is equipped with automatic engineered fire suppression systems specifically designed to protect and preserve electronic equipment. These systems are in place to promptly detect and suppress fires, ensuring the safety and integrity of the equipment.

5.1.6 Media Storage

Telecert ensures that all media utilized is handled and stored securely to safeguard against damage, theft, and unauthorized access. In particular, media containing Private Key material is stored offline in a secured environment. Access to private key materials is documented and all items are handled, packaged, and stored in accordance with the sensitivity level of the information it protects or grants access to. The storage protection measures employed for CA Private Key material are aligned with the specifications outlined in Section 5.1.2. These practices guarantee the integrity and confidentiality of the stored data and uphold the required security standards.

5.1.7 Waste Disposal

Paper documents or any other printed material containing Telecert PKI information or other confidential data are subjected to secure disposal methods such as shredding or destruction through an approved service. Removable media that contain Telecert PKI information or related confidential data are securely disposed of by completely destroying the media or by utilizing approved utilities to wipe or overwrite the data stored on the removable media. These practices ensure the complete eradication of sensitive information and maintain the confidentiality and integrity of Telecert's PKI operations, commensurate with those in SP 800-88.

5.1.8 Off-site Backup

A system backup shall be made when a Telecert system is activated. Telecert operational system backups shall be made at least once per week.

Telecert utilizes an off-site location for the storage and retention of backup software and data related to the Telecert PKI. This off-site storage facility is accessible to authorized personnel round the clock, 24 hours per day and 7 days per week, allowing for seamless retrieval of software and data when needed. The off-site storage facility adheres to robust physical security measures, ensuring the appropriate levels of protection against fire incidents and unauthorized access. These precautions are in place to maintain the integrity and availability of Telecert's PKI backup resources and to safeguard the stored data.

5.2 Procedural Controls

5.2.1 Trusted Roles

Within the PKI ecosystem, individuals perform their designated functions within clearly defined trusted roles. These roles are established and upheld to ensure shared responsibility, restrict individual actions, and securely separate duties and functions within the PKI framework. Trusted roles encompass various responsibilities, including but not limited to:

- **CA Administrator** : Authorized to install, configure and maintain the CA systems used for Certificate life-cycle management.
- **RA Administrator** : Certificate generation and revocation, and end entity creation and deletion.
- **System Administrator** : Responsible for operating the CA and RA systems on a day-to-day basis.
- **Network Administrator** : Responsible for operating networking equipment on a day-to-day basis.
- **Validation Specialist** : Responsible for validating the authenticity and integrity of data to be included within Certificates via a suitable RA system.
- **Security Auditor** : Responsible for internal auditing of CAs and RAs and responsible for administering the implementation of the security practices. This sensitive role shall not be combined with any other sensitive role, e.g. the Security Auditor shall not also be a CA Administrator. Security Auditors shall review, maintain, and archive audit logs, and perform or oversee internal audits (independent of formal compliance audits) to ensure that CAs and RAs are operating in accordance with any applicable CP/CPS.

5.2.2 Number of Persons Required Per Task

Active participation by Telecert personnel is mandatory for PKI-sensitive operations. Such participation necessitates the involvement of at least two trusted individuals, who will fulfill their specified roles to carry out the required duties. To ensure the security of CA Private Keys, backup, storage, and recovery procedures must be executed by personnel in trusted roles, employing dual control measures within a physically secured environment.

It is important to note that multi-party control should not be established using personnel serving solely in the Security Auditor role, except for audit functions. The following tasks specifically require the involvement of two or more individuals:

- Generation, activation, and backup of CA keys.

- Performance of CA administration or maintenance tasks.
- Archiving or deleting CA audit logs, with at least one participant fulfilling the role of Security Auditor.
- Physical access to CA equipment.
- Access to any copy of the CA cryptographic module.

5.2.3 Identification and Authentication for Each Role

All individuals authorized in trusted roles must properly authenticate themselves to the relevant CA or RA before performing their duties. Background checks are performed on all Trusted Role personnel.

Trusted Role personnel authenticate themselves using unique credentials that are distinct from any credential they use to perform non-trusted role functions. This credential is coupled with multi-factor authentication to insure authorized use. Individuals holding trusted roles are appointed to the trusted role by the Policy Management Authority. These appointments shall be periodically reviewed for continued need, and renewed as appropriate. The approval by the policy authority is recorded in a secured ticketing system.

Users requiring access to a sensitive resource are required to authenticate themselves to all associated systems.

5.2.4 Roles Requiring Separation of Duties

Any trusted role as defined in Section 5.2.1 intrinsically possesses duties and/or capabilities separate from those in other trusted roles. All trusted role personnel have only one identity when accessing CA systems.

5.3 Personnel Security Controls

Telecert shall maintain personnel security controls for its operation. The personnel controls employed for CA operation are specified in the following subsections.

5.3.1 Qualifications, Experience, and Clearance Requirements

Telecert ensures that the identity and reliability of all personnel, including employees, agents, and independent contractors, are verified before engaging their services.

For individuals occupying trusted roles, as defined in Section 5.2.1, Telecert requires them to possess relevant experience and be deemed qualified for the role. Prior to performing any duties within the trusted role, personnel are required to undergo Telecert training to ensure their preparedness and competence. Telecert also performs background checks and periodic reviews of Trusted Role job performance to insure that only the highest quality personnel fulfill the role.

5.3.2 Background Check Procedures

All individuals carrying out functions within trusted roles have successfully completed thorough security screenings and background checks that comply with Telecert's current standards. These checks are tailored to the specific requirements of each role. The background check procedures involve verifying relevant information, which may include identity confirmation through government-issued photo identification, as well as conducting research on previous employment history, relevant qualifications, and criminal records, as applicable. The purpose of these measures is to ensure the integrity and suitability of individuals fulfilling trusted roles within Telecert.

5.3.3 Training Requirements

Telecert is committed to delivering comprehensive training to all personnel involved in information verification duties. This training encompasses various essential areas, including, but not limited to:

- CA security principles and mechanisms;
- All PKI software versions in use on the CA system;
- All PKI duties they are expected to perform;
- Certificate lifecycle management;
- Subscriber vetting and identification and validation procedures;
- Disaster recovery and business continuity procedures;
- Stipulations of this CPS.

Telecert ensures that all personnel engaged in validation duties receive appropriate training and maintain a suitable skill level. The training program includes an initial examination and periodic retraining sessions to align with any changes in PKI operations. Thorough documentation is maintained for all training activities conducted.

5.3.4 Retraining Frequency and Requirements

Personnel holding any Trusted Role are required to consistently maintain skill levels commensurate with their respective roles. They are also obliged to undergo periodic retraining specific to their roles. Telecert's retraining programs are designed to encompass and address any pertinent changes in the Telecert PKI and related operations.

To ensure compliance and record-keeping, Telecert diligently maintains records of all retraining activities performed by personnel. This approach guarantees that the necessary skill levels are upheld and that individuals remain up to date with the evolving requirements of their Trusted Roles within the organization.

5.3.5 Job Rotation Frequency and Sequence

No Stipulation.

5.3.6 Sanctions for Unauthorized Actions

Failure by Telecert employees and agents to comply with the Telecert CP/CPS, whether due to negligence or malicious intent, may result in administrative or disciplinary actions. These actions can include the termination of employment or agency, as well as potential criminal sanctions.

If a Telecert employee holding a Trusted Role is found to have engaged in unauthorized actions, they will be promptly removed from that role pending the results of an investigation. Telecert management will conduct a thorough review of the incident, examining the underlying details. Once a conclusion has been reached, Telecert management will promptly issue an applicable resolution report.

The resolution process may involve termination, other forms of sanctions, or the individual being demoted to a new non-trusted role within the Telecert PKI. Additionally, retained personnel may be required to undergo additional training programs as determined by Telecert management in order to address any identified shortcomings and prevent future incidents.

5.3.7 Independent Contractor Requirements

All personnel, including independent contractors and personnel from Delegated Third Parties, who are engaged in the issuance of Certificates through the Telecert PKI, are fully bound by Telecert's CPS. This entails complying with the training and skills requirements outlined in Section 5.3.3, as well as abiding by the sanctions specified in Section 5.3.6. Furthermore, these personnel must adhere to the document retention and event logging requirements detailed in Section 5.4.1. The same expectations and obligations that apply to Telecert employees also extend to these individuals, ensuring consistency and adherence to the highest standards across all parties involved in the issuance process.

5.3.8 Documentation Supplied to Personnel

Telecert is committed to providing authorized personnel with all the necessary documentation required to carry out their job functions and duties effectively. All documentation pertinent to the duties, functions, and obligations of personnel utilizing the Telecert PKI and related functions will be readily available to authorized personnel. This documentation will be properly maintained and updated to ensure accuracy and alignment with current operations and processes.

Access to documentation specifically associated with specific Trusted Roles may be restricted to personnel holding those roles. Relevant materials will be systematically disseminated through Telecert's training and retraining programs, ensuring that personnel are equipped with up-to-date information.

Any changes made to the operations, processes, or practices pertaining to the Telecert PKI will be diligently recorded and incorporated into the corresponding documentation, reflecting the most current state of affairs. This practice ensures that personnel have access to accurate and current information in support of their roles and responsibilities.

5.4 Audit Logging Procedures

Telecert generates audit log files for all events relating to the security of the CA operation. The log information is automatically collected. Where this is not possible, Telecert uses a logbook, paper forms or other physical mechanisms to capture the information. Details of how Telecert implements the audit logging are specified in the following subsections.

Procedures are in place for the PMA and internal auditing team to review the logs on a request basis.

5.4.1 Types of Events Recorded

All security-related events concerning the Certificate Systems, Certificate Management Systems, Root CA Systems, and delegated Third Party Systems of Telecert, as well as each Delegated Third Party, are meticulously recorded in audit log files.

Whenever possible, security audit logs are generated automatically. In cases where automatic generation is not feasible, alternative methods such as logbooks, paper forms, or other physical mechanisms are employed.

The retention of all security audit logs is in accordance with the specifications outlined in Sections 5.4.3 and 5.5. These logs are preserved and made available to Qualified Auditors upon request.

Each log entry includes the following essential elements:

- Date and time of the event
- Identity of the person responsible for the journal entry
- Description detailing the nature of the event

By capturing these log elements, Telecert ensures the comprehensive documentation of security-related activities, providing a valuable resource for auditing and maintaining the integrity of the systems involved.

Examples of auditable events include:

- Access to CA computing equipment (e.g., logon, logout),
- Messages received requesting CA actions (e.g., certificate requests, certificate revocation requests, compromise notifications),
- Access to subscriber identification information,
- Certificate creation actions,
- Posting of any material to a repository,
- Adding a revoked certificate to the CRL maintained by the STI-PA,
- Any attempts to change or delete audit data,
- Key generation,
- Software and/or configuration updates to the CA,

- Clock adjustments.

5.4.2 Frequency of Processing Log

Telecert is dedicated to monitoring the integrity of the logging processes for both application and system logs. This is achieved through continuous automated monitoring and alerting mechanisms, or alternatively, through periodic human reviews to ensure the effectiveness of logging and log-integrity functions. If a human review is employed and the system is online, the review process will take place at least once every 31 days.

Following each review, a summary of the findings, if any, will be reported to the appropriate personnel. In cases where investigations are initiated based on reported findings, any resulting recommendations and actions taken to address the identified issues will be meticulously documented. These records are made available to auditors upon request.

By actively monitoring and reviewing the logging processes, Telecert ensures the ongoing accuracy and effectiveness of the logging system, thereby maintaining the integrity and security of its operations. Telecert monitors all alert systems 24 hours a day, 7 days a week.

5.4.3 Retention Period for Audit Log

Audit logs shall be retained for at least ninety (90) days in addition to being archived as described in Section 5.5.

5.4.4 Protection of Audit Log

Telecert is responsible for collecting and conducting regular analysis of pertinent audit data to detect any attempts aimed at compromising the integrity of any aspect of the Telecert PKI. Access to Telecert audit logs is restricted solely to authorized personnel and auditors. Audit logs are written only by the logging mechanism and are not modiiable by human or machine.

Telecert retains the authority to determine which audit records may be viewed by others and the specific circumstances under which such records will be made available.

To ensure the integrity and preservation of audit logs, Telecert implements protective measures against unauthorized modification or destruction. Digital logs are maintained in an encrypted format, safeguarding their confidentiality and integrity.

5.4.5 Audit Log Backup Procedures

Telecert conducts a daily onsite backup of the audit log to ensure its preservation and availability. This backup process includes the creation of a weekly copy of the audit log from the Telecert facility. To enhance security and protection, this backup is securely stored at an offsite location dedicated to maintaining the integrity of the data.

5.4.6 Audit Collection System (Internal vs. External)

The security audit process operated by Telecert operates autonomously from the Telecert PKI certificate issuance software. This ensures that the security audit processes initiate upon

system start-up and continue uninterrupted until system shutdown. It is of utmost importance that these security audit processes are designed to be immune to any attempts to bypass or circumvent them, reinforcing their effectiveness and reliability in upholding security standards.

5.4.7 Notification to Event-Causing Subject

Not Applicable.

5.4.8 Vulnerability Assessments

Telecert and Delegated Third Parties conduct routine vulnerability assessments and penetration tests to ensure the security of all Certificate Systems. These assessments occur at least once a year and encompass a comprehensive examination of potential vulnerabilities and threats.

In addition to the regular assessments, vulnerability assessments may be carried out in the following circumstances:

- After any significant system or network changes as determined by the CA.
- At least once per quarter, targeting both public and private IP addresses identified by the CA or Delegated Third Party as part of their Certificate Systems.

These assessments are designed to identify, review, and address any identified vulnerabilities and threats, following a documented vulnerability correction process. This approach ensures that necessary measures are taken to mitigate risks and enhance the overall security posture of the Certificate Systems.

5.5 Records Archival

5.5.1 Types of Records Archived

Telecert and each Delegated Party are required to maintain archives of all documentation pertaining to certificate requests, their verification process, and the issuance and revocation of Certificates.

At a minimum, if applicable, the following data shall be recorded for archive:

- CP
- CPS
- Contractual obligations
- Other agreements concerning operations of the CA
- System and equipment configuration
- Subscriber identity authentication data as per Section 3.2.3
- Documentation of receipt and acceptance of certificates (if applicable)

- Subscriber agreements
- Documentation of receipt of tokens
- All certificate requests for which the authorization failed
- All certificates issued
- All certificates revoked
- All Audit logs
- Other data or applications to verify archive contents
- Compliance Auditor reports
- Any changes to the Audit parameters, e.g. audit frequency, type of event audited
- Any attempt to delete or modify the Audit logs
- All access to any certificate subject private keys retained within the CA for key recovery purposes
- All changes to the trusted public keys, including additions and deletions
- Remedial action taken as a result of violations of physical security
- Violations of CP
- Violations of CPS

Furthermore, Telecert and each Delegated Party are obligated to archive the following:

- Documentation pertaining to the security of their Certificate Systems, Certificate Management Systems, Root CA Systems, and Delegated Third Party Systems.
- Documentation related to the verification, issuance, and revocation of certificate requests and Certificates.

Telecert is also authorized to archive any other documents deemed relevant to the operations of the Telecert PKI. By maintaining these archives, Telecert ensures the availability of historical records necessary for auditing, compliance, and the overall management of the PKI infrastructure.

5.5.2 Retention Period for Archive

Archive records will be kept for a minimum of seven (7) years and six (6) months without any loss of data.

5.5.3 Protection of Archive

Archives shall be securely retained and safeguarded against any unauthorized modification or destruction for the duration specified in Section 5.5.2. Archives are maintained in a secure storage system separate from the CA systems with physical and procedural security controls equivalent to or better than those of the Telecert PKI.

Telecert is committed to implementing all necessary measures to ensure that only authorized access is granted to the archives. This ensures the integrity and confidentiality of the archived information, promoting the security and trustworthiness of the Telecert operations.

5.5.4 Archive Backup Procedures

Telecert will employ secure and verifiable backup procedures to ensure the availability of a comprehensive and easily accessible backup archive in case of primary archive loss or damage. The backup archive will be stored at a separate and secure location, distinct from the primary archive. Access to the backup archive will be protected by security protocols equivalent to those implemented for the primary archive.

To prevent data loss, maintenance of the backup archive will involve periodic transfer of archived data to new media. This practice ensures the preservation and integrity of the data, safeguarding it against any potential loss or degradation. Telecert's commitment to robust backup procedures guarantees the continuity and resilience of its archival systems.

5.5.5 Requirements for Time-Stamping of Records

All archived documents will incorporate precise timestamps indicating the date and time of their creation, occurrence, or modification. These timestamps will be sourced from a trusted time source, as defined in Section 6.8. By relying on such trusted time sources, Telecert ensures the accuracy and integrity of the timestamps associated with archived documents, enhancing the reliability and traceability of the archival records.

5.5.6 Archive Collection System (Internal or External)

Telecert shall employ internal systems to collect and maintain a primary archive.

5.5.7 Procedures to Obtain and Verify Archive Information

Access to Telecert's primary and backup archives will be restricted solely to authorized Telecert personnel and qualified auditors.

Upon request and at its discretion, Telecert may release specific records pertaining to requests made by a Subscriber, a Relying Party, or an authorized agent of a Subscriber or Relying Party. However, Telecert will not disclose the archives in their entirety unless mandated by law.

In cases where access or retrieval of requested archival data is necessary, Telecert may require compensation and fees to cover associated costs.

Telecert is committed to ensuring the integrity and readability of both the primary and backup archives. To verify their reliability, periodic random testing will be conducted, thus validating the accuracy and accessibility of the archived data. This practice reinforces Telecert's commitment to maintaining high standards of data integrity and security.

5.6 Key Changeover

Telecert will ensure a secure and well-managed transition of Private Keys for any expiring Root Certificate used within the Telecert PKI.

During the key changeover process, Telecert will maintain concurrent Root Certificates, specifically the expiring Root Certificate with its associated Private Key and the new Root Certificate with the updated Private Key. This coexistence of certificates will be strictly limited to a temporary period, allowing for a seamless transition of functions and services. The temporary period will conclude upon the expiration of the original Root Certificate's Private Key.

Telecert will promptly provide Subscribers and Relying Parties with the new Public Key through the delivery methods outlined in Section 6.1.4, ensuring a smooth and uninterrupted continuation of services.

Similar key changeover and key distribution methods will be employed to manage the expiration of any cross-certified certificates, maintaining the security and reliability of the Telecert PKI ecosystem.

5.7 Compromise and Disaster Recovery

Telecert has established and maintains a comprehensive Business Continuity Plan (BCP) that outlines the necessary steps, procedures, and actions to be taken in the event of incidents or disasters that negatively impact any function of the Telecert PKI. This plan ensures that operations can be restored promptly and efficiently, minimizing any potential disruptions and enabling the continued provision of services to Subscribers and Relying Parties. The BCP serves as a strategic framework, guiding Telecert's response and recovery efforts to effectively address and mitigate the impact of adverse events on the Telecert PKI infrastructure.

5.7.1 Incident and Compromise Handling Procedures

Telecert upholds a set of policies and procedures designed to address potential or actual security compromises, natural disasters, and similar events. These policies encompass an Incident Management Policy (IMP), a Business Continuity and Disaster Recovery Plan, and various other relevant resources. It is important to note that these documents are not limited to the ones mentioned above.

Telecert is committed to regularly reviewing, testing, and updating these policies and procedures as necessary. This ensures their continued effectiveness and alignment with the evolving security landscape and operational requirements. By maintaining a proactive approach to policy and procedure management, Telecert enhances its readiness to respond to

unforeseen events and maintain the continuity of its operations. If compromise of a Telecert occurs, certificate issuance by Telecert shall be stopped immediately. An independent, third-party investigation shall be performed in order to determine the nature and the degree of damage. The scope of potential damage shall be assessed in order to determine appropriate remediation procedures. If a Telecert private signing key is suspected of compromise, the procedures outlined in Section 5.7.3 shall be followed.

Telecert shall immediately notify the PMA if any of the following occur:

- Actual or detected compromise of any CA system or subsystem;
- Physical or electronic penetration of any CA system or subsystem;
- Successful denial of service attacks on any CA system or subsystem; or
- Any incident preventing Telecert from notifying the STI-PA of a revoked certificate (e.g., compromised credentials).

5.7.2 Computing Resources, Software, and/or Data are Corrupted

Telecert's Business Continuity Plan incorporates comprehensive measures to handle incidents involving the corruption of Computing Resources, Software, and/or Data associated with the Telecert PKI. In the event of such incidents, affected operations will be thoroughly investigated and promptly suspended as necessary. The restoration of suspended activities will be prioritized to minimize disruptions while ensuring the secure operation of the Telecert PKI.

When computing resources, software, and/or data are corrupted, STI-CAs operating under this CP shall respond as follows:

- Notify the PMA director as soon as possible using the PMA contact information provided in this CP.
- Ensure that the system's integrity has been restored prior to returning to operation and determine the extent of loss of data since the last point of backup.
- Reestablish CA operations.
- If the CA signing keys are destroyed, reestablish CA operations as quickly as possible, giving priority to the generation of a new CA signing key pair.
- If the integrity of the system cannot be restored, or if the risk is deemed substantial, reestablish system integrity before returning to operation.

To validate the effectiveness of the Disaster Recovery Plan, regular testing is conducted at least once every year. This testing enables Telecert to assess the readiness and functionality of the plan, making any necessary adjustments or improvements to enhance its response capabilities. By diligently reviewing and testing the plan, Telecert maintains a high level of preparedness to effectively address any incidents and swiftly restore operations within the Telecert PKI.

5.7.3 Entity Private Key Compromise Procedures

5.7.3.1 Root CA Compromise Procedures

In the case of the Root CA compromise, Telecert shall immediately notify the PMA. Telecert will also notify all Subscribers. The PMA shall update the list of trusted STI-CAs and make it available to all Subscribers and Relying Parties to obtain the new list of Trusted STI-CAs.

Initiation of notification shall be made at the earliest feasible time and shall not exceed twenty-four (24) hours beyond determination of the actual compromise or loss unless otherwise required by law enforcement. If the cause of the compromise can be adequately addressed, and it is determined that the PKI can be securely re-established, Telecert shall then generate a new Root CA certificate and update its account with the STI-PA per the established CPS procedures.

CP changes that place new requirements on an existing root (or issuing) CA will be limited to those that have been evaluated and required to address a security issue within the SHAKEN ecosystem. For such changes, the PMA will coordinate with individual STI-CAs on a practical implementation approach and schedule.

Telecert has established procedures to effectively respond to any incident involving the loss, destruction, compromise, or suspected compromise of a CA Private Key. These procedures also apply to situations where there is a compromise of the algorithms and parameters used to generate the Private Key and certificate. Following a thorough investigation of the incident, appropriate steps will be taken, which may include, but are not limited to:

- Revocation of the affected CA Private Key
- Generation of a new CA Key Pair
- Notification of all affected Subscribers
- Revocation of all Certificates signed with the affected CA Private Key

5.7.3.2 Intermediate CA Compromise Procedures

In the event of an Intermediate CA key compromise, the ICA shall notify the Telecert PMA and the Root CA. The STI-PA shall revoke that CA's intermediate STI-CA certificate, and the revocation information shall be published immediately via the distributed CRL model described in section 4.9. The Compromised CA shall also investigate and report to Telecert and the PMA what caused the compromise or loss, and what measures have been taken to preclude recurrence. If the cause of the compromise can be adequately addressed and it is determined that the CA can be securely re-established, then the CA shall be re-established. Upon re-establishment of the CA, new Subscriber certificates shall be requested and issued.

CP changes that place new requirements on an existing intermediate (or issuing) CA will be limited to those that have been evaluated and required to address a security issue within the

SHAKEN ecosystem. For such changes, the Telecert PMA will coordinate with individual STI-CAs on a practical implementation approach and schedule.

5.7.4 Business Continuity Capabilities After a Disaster

Telecert's Business Continuity Plan is designed to ensure secure continuous operations, and/or timely and secure restoration of affected operations, in the event of an incident or disaster.

5.8 STI-CA Termination

When Telecert operating under this CP terminates operations before all certificates have expired, entities shall be given as much advance notice as circumstances permit. The STI-CA shall notify the PMA using documented contact information, and the STI-PA shall remove the STI-CA from the Trusted STI-CA List. The STI-CA shall archive all audit logs and other records prior to termination. The STI-CA shall destroy all private keys upon termination. The STI-CA archive records shall be transferred to the PMA. If a Root CA is terminated, the Root CA shall be removed from the list of trusted STI-CAs. In that case, any certificates that have not been revoked will be invalid once the relying parties receive the updated list.

5.9 STI-CA Authority to Issue STI Certificates is Withdrawn

If Telecert loses its authority to issue STI Certificates, then the STI-PA shall remove the Telecert roots from the Trusted STI-CA list.

6 Telecert SHAKEN TECHNICAL SECURITY CONTROLS

Telecert is committed to implementing and upholding suitable technical security controls that govern all operations within the Telecert PKI. These controls are designed to safeguard the integrity, confidentiality, and availability of the PKI infrastructure, ensuring the secure and reliable issuance, management, and revocation of Certificates. Telecert continuously maintains and updates these technical security controls to align with industry best practices and evolving security requirements. By doing so, Telecert ensures a robust and resilient security posture within the Telecert PKI ecosystem.

6.1 Key Pair Generation and Installation

Telecert is responsible for the generation and installation of all CA Key Pairs, which will be conducted in a physically secure environment using secure cryptographic equipment. These tasks will be performed exclusively by personnel occupying trusted roles and following the prescribed methodology outlined in Section 6.1.1. This approach ensures the utmost protection and integrity of the CA Key Pairs, maintaining the security of the Telecert PKI infrastructure.

Access to physical modules shall be controlled as detailed in Section 6.2.

6.1.1 Key Pair Generation

Telecert ensures that CA Key Pairs are exclusively generated within cryptographic modules specified in Section 6.2.

The generation process follows a Key Generation Script ceremony, involving multiple trusted individuals in specific roles. For intermediate CA keys, the process is witnessed by an internal or external audit team. External auditors may also issue an appropriate opinion report for Root Certification Authority or subordinate Authority not under the operator's control.

Subscriber key pair generation shall be performed by the Subscriber or a delegate with written authorization from Subscriber.

6.1.2 Private Key Delivery to Subscriber

This is not applicable in the case that only the Subscriber generates the key pair.

6.1.3 Public Key Delivery to Certificate Issuer

Public key delivery to Telecert must be by methods conforming to Section 3.2.1. or through other established protocols such as ACME.

6.1.4 CA Public Key Delivery to Relying Parties

Telecert ensures the secure delivery of Public Keys to Relying Parties, minimizing the risk of substitution attacks.

Third parties as well as Subscribers and Relying Parties are authorized to use and distribute the current Telecert Root Certificate. These Root Certificates are readily available and regularly updated in the Telecert repository, ensuring accessibility and proper maintenance.

6.1.5 Key Sizes

For STI Certificates under this CPS, Telecert shall generate digital signatures with:

- the Elliptic Curve Digital Signature Algorithm (ECDSA) with Curve P-256 and SHA-256 or ECDSA with Curve P-384 and SHA-384
- a NIST-approved hash function that offer the same security as the elliptic curve used by the CA. For example, the NIST P-256 curve and SHA-256 offer the same security.

6.1.6 Public Key Parameters Generation and Quality Checking

Telecert employs HSMs that adhere to [FIPS 186-4] and [RFC 5480] standards, equipped to deliver random number generation and on-board generation of ECDSA keys, each with a minimum length of 256 bits.

6.1.7 Key Usage Purposes (as per X.509 v3 Key Usage Field)

The Telecert Root CA Private Keys are exclusively used for signing Certificates for specific purposes:

1. Self-signed Certificates for the Telecert Root CA.
2. Certificates for Subordinate CAs and Cross Certificates.
3. Certificates for infrastructure needs, such as administrative role Certificates and internal CA operational device Certificates.
4. Certificates for OCSP Response verification.

6.2 Private Key Protection and Cryptographic Module Engineering Controls

6.2.1 Cryptographic Module Standards and Controls

CA Private Keys are securely stored and utilized exclusively within a Hardware Security Module (HSM) designed for key signing operations. The HSM employed meets the stringent FIPS 140-2 level 3 standards, ensuring the highest level of security for the storage and usage of CA Private Keys.

6.2.2 Private Key (n out of m) Multi-person Control

Telecert CA Private Keys, including backups, require activation and access by multiple individuals fulfilling specific trusted roles. This “n-of-m multi-person control” approach ensures that the Private Keys can only be utilized when authorized personnel authenticate using multi-factor authentication methods.

6.2.3 Private Key Escrow

No stipulation

6.2.4 Private Key Backup

Telecert ensures the secure and reliable backup of CA Private Keys by multiple authorized individuals holding trusted roles. Backup copies of Telecert CA Private Keys are securely stored, following the procedures outlined in Section 5.1.6 for media storage and encryption. Access to backup copies is strictly limited to authorized personnel.

For Subscriber Certificates, the control of private key backups lies exclusively with the Subscriber, provided it is technically feasible.

Backup keys for Telecert CA Private Keys are stored solely in encrypted form, ensuring they are never stored as plain text outside of a cryptographic module (as described in Section 6.2.1).

At the end of their lifecycle, all copies of the CA Private Keys, including signing keys, are securely decommissioned.

6.2.5 Private Key Archival

Telecert shall not archive Private Keys.

6.2.6 Private Key Transfer Into or From a Cryptographic Module

The transfer of Telecert CA Private Keys to and from hardware security modules is conducted through a secure and verifiable process, involving multiple individuals in designated trusted roles.

During the transfer, Telecert CA Private Keys are maintained exclusively in encrypted form and are never in plain text outside of a cryptographic module (as outlined in Section 6.2.1).

6.2.7 Private Key Storage on Cryptographic Module

Telecert securely generates, stores, and employs CA Private Keys using a dedicated Hardware Security Module, following the guidelines outlined in Section 6.2.1. Root Private Keys are stored in offline cryptographic modules or backup tokens for enhanced security.

6.2.8 Method of Activating Private Key

Telecert activates CA Private Keys following the manufacturer's instructions and specifications for the cryptographic module, employing a secure and verifiable process. This process involves multiple authorized individuals in trusted roles and incorporates multi-factor authentication.

Applicants and Subscribers are advised to adhere to the standards outlined in the relevant Subscriber Agreement to safeguard their Private Keys. The responsibility for protecting Private Keys rests solely with the Subscribers.

6.2.9 Method of Deactivating Private Key

Telecert deactivates CA Private Keys stored in cryptographic hardware when they are not in use, following documented procedures that uphold the necessary physical and logical security controls.

6.2.10 Method of Destroying Private Key

CA Private Keys are securely destroyed when they are no longer required. The destruction process involves:

- Using the secure deletion function of the Hardware Security Module (HSM) to destroy any CA Private Key stored within it, following the manufacturer's instructions. Only the specific instance of the CA Private Key stored in the HSM is destroyed.
- Ensuring the destruction of any other encrypted copies and fragments of the CA Private Key over a reasonable period of time.

When a CA cryptographic device is permanently taken out of service, the CA Private Key used for cryptographic purposes within the device is erased. If the device case provides tamper-evident characteristics and is being permanently removed from service, the case is destroyed.

The destruction of CA Private Keys and cryptographic devices is carried out exclusively by authorized personnel in trusted roles, following documented and verifiable procedures.

Subscribers bear full responsibility for securely and completely destroying all copies and fragments of their Private Key at the end of the Key Pair life cycle.

6.2.11 Cryptographic Module Rating

See Section 6.2.1

6.3 Other Aspects of Key Pair Management

6.3.1 Public Key Archival

Telecert archives Public Keys as described in Section 5.5.

6.3.2 Certificate Operational Periods and Key Pair Usage Periods

The maximum validity period of CA Certificates is:

- Twenty-five (25) years for Root CAs,
- Twelve (12) years for Intermediate CAs, and
- Three (3) years for end-entity certificates.

The operational period of Key Pairs is determined based on key size and technological advancements in cryptography to ensure optimal security and efficiency.

Subscribers are advised against reusing Key Pairs when applying for new certificates.

6.4 Activation Data

6.4.1 Activation Data Generation and Installation

Telecert activates and deploys Telecert CA Private Keys into cryptographic modules following the instructions and specifications provided by the module manufacturer. The initial generation, activation, and installation are performed through a CA key ceremony as outlined in Section 6.1.1.

To ensure secure access to Private Keys generated for Subscribers, separate Activation Data is generated and safeguarded.

Activation data chosen by the user can be customized. The activation data's strength must align with or surpass the authentication mechanism requirements defined for Level 3 in FIPS 140-2 or an equivalent standard. In case transmission of activation data is necessary, it should occur through a securely protected channel, separate in both time and location from the associated cryptographic module.

6.4.2 Activation Data Protection

Telecert safeguards activation data to prevent unauthorized disclosure or compromise. Robust cryptographic and physical access controls are implemented to ensure the protection of CA Private Key activation data.

When Telecert generates Key Pairs for Subscribers, Activation Data is exclusively delivered through a secure channel separate from the delivery of the cryptographic module containing the corresponding Private Key.

6.4.3 Other Aspects of Activation Data

Activation data for Telecert CA Private Keys and associated root Certificates is exclusively held by Telecert personnel in designated trusted roles.

6.5 Computer Security Controls

6.5.1 Specific Computer Security Technical Requirements

Telecert Shaken PKI systems are appropriately secured in order to protect CA software and data from unauthorized access or modification. Access pathways to systems are secured via multi-factor authentication whenever possible with unique user logins for each element in the system. Security updates are applied in a timely fashion after testing and vulnerability scans are run regularly. Additional requirements detailed below.

6.5.1.1 Access Control

Access to information such as sensitive details about customer accounts, passwords, and CA-related private keys are carefully guarded and logged. Access to the physical machines housing such information is also closely guarded and logged.

6.5.1.1.1 Access Control Policy and Procedures

Telecert has documented the roles and responsibilities for each trusted role employee job function. Telecert has also created and maintains a mapping of these trusted roles and their associated responsibilities to specific employees and their accounts on the CA system.

6.5.1.1.2 Account Management

Access for operational staff and trusted role employees are limited to the functionality required to perform their specific job function.

Telecert maintains a record of accounts, along with the conditions and procedures to follow when creating new accounts, groups and roles. Groups and roles are mapped to the business function involved in operating the CA.

Telecert takes appropriate action when a user no longer requires an account, their business role changes, or the user is terminated or transferred. Telecert shall annually review all active

accounts to match active authorized users with accounts and disable or remove any accounts no longer associated with an active authorized user.

Automated systems are configured to maintain access for only those users who are actively authorized to use the information system. After thirty (30) days of inactivity, an accounts are automatically disabled and attempts to access any deactivated account shall be logged.

All account administration activities, including account creation, modification, enabling, disabling, group or role changes, and removal actions, are logged and are available for inspection by appropriate security personnel. Guest, default, and anonymous accounts for logon to CA operations systems disabled and prohibited. Accounts are only assigned to a single user and not shared.

6.5.1.1.3 Least Privilege

All systems utilized in the Telecert PKI, including CA servers, support and vetting workstations, and systems used by trusted third parties, are configured, maintained, and secured according to industry best practices, including the principle of least privilege. Each user or system only has the necessary permissions to accomplish assigned tasks and users are required to use non-privileged accounts or roles when accessing non-privileged functions (such as reading email).

6.5.1.1.4 Access Control Best Practices

Telecert follows industry best practices for managing access control. Examples include, but are not limited to:

- Unique User IDs are associated with each individual user.
- All user activity shall be traceable to an individual.
- No shared or default accounts shall be used.
- There is a process to track the assignment and configurations of administrative privileges toCA operations systems. The principle of least privilege shall be followed.
- There is an authorization process to approve users and their associated privileges.
- There is a process to establish, change, deactivate and remove UserIDs and privileges.
- Passwords shall be at least 8 characters with associated complexity and usage rules.
- Passwords are never stored or transmitted in clear text.
- There are defined session timeouts (15 minutes) during periods of user inactivity.
- There shall be a limit on failed login attempts (5). If there is a lockout, an administrator needs to reset the password.
- For remote access from external public networks, multi-factor authentication shall be used.
- There shall be logging of all failed login attempts and changes in administrative privileges.

6.5.1.1.5 Authentication: Passwords and Accounts

In situations where Telecert Shaken PKi allows user selectable passwords, strong passwords shall be employed, as defined in the CA password policy described in section 6.5.1.1.4. Passwords for CA authentication operational systems shall be different from CA enterprise systems.

Telecert shall have the minimum number of user accounts that are necessary to its operation. Account access shall be locked after five (5) unsuccessful login attempts in a one hour period. Restoration of access shall be performed by a different person who holds a trusted role, or restore access after a timeout period. Whenever possible, multi-factor authentication is implemented for PKI components that support it, including accounts with certificate issuance capabilities.

6.5.1.1.6 Permitted Actions without Identification or Authentication

Not applicable. There are no privileged actions that can be performed without identification or authentication.

6.5.1.2 System Integrity

6.5.1.2.1 System Isolation and Partitioning

Telecert Shaken PKI systems are configured, operated, and maintained so as to ensure the continuous logical separation of CA operations processes and their assigned resources. This separation shall be enforced by:

- Physical and/or logical isolation mechanisms, such as dedicated systems or virtualization;
- Protecting an active process and any assigned resources from access by or interference from another process;
- Protecting an inactive process and any assigned resources from access by or interference from an active process; and
- Ensuring that any exception condition raised by one process will have no lasting detrimental effect on the operation or assigned resources of another process.

All trusted components are logically separated from each other and shall be logically separated from any untrusted components of the CA system.

6.5.1.2.2 Malicious Code Protection

Systems are defined as idempotent and are regularly re-deployed via Continuous Integration. The continuous integration system is hardened and all code / changes are required by a trusted role prior to deployment.

6.5.1.2.3 Software and Firmware Integrity

All software, including dependencies are maintained in a dedicated source repository and are freshly built as part of each deployment. Commitments into the master branch require third-party trusted role approval.

All firmware on associated hardware is code signed by the hardware manufacturer or the infrastructure operator and are verified prior to installation.

6.5.1.2.4 Information Protection

Telecert shall protect the confidentiality and integrity of sensitive information stored or processed on CA systems that could lead to abuse or fraud. In the most sensitive systems, cache periods are kept to a minimum and in some cases cashes are not used such to ensure the latest information is used to determine if a certificate should be issued.

Sensitive information stored on devices that are not physically protected from potential attackers shall be stored in an encrypted format.

6.5.2 Computer Security Rating

No stipulation.

6.6 Life Cycle Security Controls

6.6.1 System Development Controls

Telecert's system development controls encompass the following measures (among others):

- Software used for CA systems undergoes a documented development process before implementation.
- Hardware and software components of the CA system are acquired in a manner that minimizes the risk of falsification, modification, or tampering.
- Secure packing methods, including tamper proof packaging where applicable, are employed when shipping and delivering hardware for CA systems, accompanied by comprehensive tracking records.
- The hardware and software utilized in CA systems are dedicated solely to CA operations, with only necessary software, hardware, and network connections installed or permitted.
- All updates to CA systems, whether hardware or software, are documented and performed exclusively by personnel in trusted roles who have appropriate authorization.

These measures ensure the integrity and security of Telecert's CA systems throughout the development lifecycle.

6.6.2 Security Management Controls

Telecert implements comprehensive security controls and monitoring across its systems, specifically focusing on CA software configurations. A well-defined process is followed to authenticate any modifications, installations, and management activities related to software used within or in connection with CA systems. This ensures that only authorized and verified changes are made to maintain the integrity and security of the software environment.

6.6.3 Life Cycle Security Controls

Telecert conducts routine security scans on all online CA operations systems using commercial vulnerability testing tools. Each scan finding triggers a ticket for assessment of severity and relevance. Valid findings are prioritized by risk level, and high-priority issues are addressed within 72 hours if feasible. Vendor patches undergo testing before deployment, and issue resolution progress is tracked via the ticketing system. We minimize dependencies, regularly track product vulnerabilities and breach notifications, and maintain open communication with vendors for efficient issue resolution. Our extensive monitoring detects anomalies, aiding in identifying misconfigurations or compromises. All issues, regardless of severity, are promptly addressed.

6.7 Network Security Controls

Telecert employs practical safeguards and controls within its network to thwart unauthorized access to CA systems and infrastructure. The network architecture is multi-tiered, aligning with the defense-in-depth principle. Robust network security measures are in place to routinely scan and review production environments and logs for operational anomalies that might indicate a breach.

Furthermore, diligent monitoring encompasses tracking dependencies and routinely assessing CVEs and security updates from vendors for suitability and deployment. Any identified potential compromises or vulnerabilities are recorded in a ticket tracking system and addressed through the same system, including decisions on patching, remediation, or other actions.

6.8 Time-stamping

Telecert maintains the accuracy of time sources utilized in all time-stamping operations through trusted and verifiable NTP (Network Time Protocol)[RFC 5905]. To ensure the authenticity of system time, Telecert employs a combination of manual and digital processes. Additional details can be found in Section 5.5.5 of the documentation.

7 Telecert SHAKEN CERTIFICATE, CRL AND OCSP PROFILES

7.1 Certificate Profile

Certificates issued by the Telecert shall adhere to the X.509 v3 certificate profile documented in RFC 5280. Telecert shall support the certificate extensions defined and described for STIR [RFC 8226], SHAKEN [ATIS-1000080.v005] and [ATIS-1000092.v002].

When issuing STI Certificates to a Service Provider, Telecert shall ensure that the 'cRLDistributionPointName' extension of the issued certificate contains a URL reference to the indirect CRL hosted by the STI-PA. Telecert shall also ensure that the 'cRLDistributionPointName' extension of all STI intermediate certificates in the certification path of the issued certificate contain that same CRL URL value.

(1) Root CA Certificates

Field or extension	Values
Serial Number	Serial Number Must be unique, with 64 bits of output from a CSPRNG
Issuer Distinguished Name	C: US; ST: Texas; L: Houston; O: SSL Corporation; CN: Telecert SHAKEN Root CA ECC R<m>, where m is an integer representing the instance of the Root CA Certificate.
Subject Distinguished Name	Same as Issuer Distinguished Name
Duration	Not greater than 25 years
Key Usage	Critical: True, keyCertSign: True
Basic Constraints	Critical: True, cA: True
Subject Key Identifier	Critical: False. Must be SHA1 hash of Subject public key

(2) Subordinate CA Certificates**

Algorithm	Values
Serial Number	Serial Number Must be unique, with 64 bits of output from a CSPRNG
Issuer Distinguished Name	Same as Issuer Subject DN
Subject Distinguished Name	C: US; ST: Texas; L: Houston; O: SSL Corporation; CN: Telecert SHAKEN Issuing CA ECC <m>, where m is an integer representing the instance of the Subordinate CA Certificate.
Duration	Not greater than 5 years

Algorithm	Values
Key Usage	Critical: True, keyCertSign: True
Basic Constraints	Critical: True, cA: True
Subject Key Identifier	Critical: False, Must be SHA1 hash of Subject public key
Authority Key Identifier	Critical: False, Must be SHA1 hash of Issuer public key
Certificate Policies	Critical: False. 2.16.840.1.114569.1.1.4
CRL Distribution Point	Critical: False. Distribution Point URI: https://authenticate-api.iconectiv.com/download/v1/crl; CRL Issuer Directory Name: [L: Bridgewater; ST: NJ; CN: STI-PA CRL; C: US; O: STI-PA]

(3) Subscriber Certificates**

Algorithm	Values
Serial Number	Serial Number Must be unique, with 64 bits of output from a CSPRNG
Issuer Distinguished Name	Same as Issuer Subject DN
Subject Distinguished Name	C: US; Organization: {Legal Name of Reporting Entity}; Common Name: SHAKEN {OCN}; Serial Number: {Unique string}
Duration	Not greater than 1 year
Key Usage	Critical: True. digitalSignature: True
Basic Constraints	Critical: True, cA: False
Subject Key Identifier	Critical: False, Must be SHA1 hash of Subject public key
Authority Key Identifier	Critical: False. Must be SHA1 hash of Issuer public key
Telephone Number Authorization List	Critical: False. SPC: {OCN}, …
Certificate Policies	Critical: False. 2.16.840.1.114569.1.1.4

Algorithm	Values
CRL Distribution Point	Critical: False. Distribution Point URI: https://authenticate-api.iconectiv.com/download/v1/crl; CRL Issuer Directory Name: [L: Bridgewater; ST: NJ; CN: STI-PA CRL; C: US; O: STI-PA]

7.1.1 Version Numbers

The Telecert PKI issues Certificates that adhere to X.509 Version 3 standards.

7.1.2 Certificate Content and Extensions

Telecert Certificates adhere to RFC 5280 and relevant industry best practices, as shown in Section 7.1.

A tabulated representation of the prevalent certificate profiles utilized by Telecert is provided in Annex A (Telecert Certificate Profiles).

7.1.3 Algorithm object identifiers

Name	Object Identifier
ecdsa-with-SHA256	1.2.840.10045.4.3.3

7.1.4 Name forms

Telecert Certificates facilitate name chaining as defined in RFC 5280. Every issued Certificate includes a distinct and identifying serial number that is greater than 0.

7.1.5 Name Constraints

Telecert reserves the right to issue Certificates with name constraints and/or marked as critical when deemed necessary.

7.1.6 Certificate Policy object identifier

The OID assigned to Telecert by IANA is iso (1) org (3) dod (6) internet (1) private (4) enterprise (1) Telecert / SSL.com (38064).

This Certification Practice Statement has been assigned the following Object Identifier [OID]: 1.3.6.1.4.1.38064.1.2.1.1.1 for Telecert CPS Version 1.1.

7.1.7 Usage of Policy Constraints extension

No stipulation

7.1.8 Policy qualifiers syntax and semantics

The policy qualifier field of Telecert includes information that relying parties can refer to for identifying potential limitations of a certificate.

7.1.9 Processing semantics for the critical Certificate Policies extension

No stipulation

7.2 CRL Profile

The CRL for the SHAKEN ecosystem is maintained by the STI-PA as defined in [ATIS-1000080.v005]. The CRL issued by the STI-PA also includes the crlExtensions CRLNumber as per RFC 5280. This extension is updated when the CRL is updated, or when the CRL expires and a new one is generated.

Telecert's PKI generates version 2 CRLs that adhere to RFC 5280 standards and include the following information:

- Issuer Signature Algorithm: The algorithm used to sign the CRL.
- Issuer Distinguished Name: The Distinguished Name of the Certification Authority that issued the CRL.
- thisUpdate: The date and time when the CRL was issued, expressed in UTCTime or GeneralizedTime.
- nextUpdate: The date and time when the next CRL will be issued, expressed in UTCTime or GeneralizedTime.
- Revocation list (identified by certificate serial number): A list of all revoked Certificates, including their serial numbers and the date and time of revocation in UTCTime or GeneralizedTime.

7.2.1 Version Numbers

CRL V2.

7.2.2 CRL and CRL Entry Extensions

When Telecert revokes a certificate, the procedures described in Section 4.9 shall be followed. Telecert shall notify the STI-PA and provide the following information, which is included in the CRL entries:

- Certificate's Serial Number;
- Revocation Date;
- Reason;
- Certificate Issuer.

7.3 OCSP Profile

Not applicable.

8 COMPLIANCE AUDIT AND OTHER ASSESSMENT

Telecert policies are designed to meet the requirements based on [ATIS-1000080.v005] and [ATIS-1000084.v003], as well as generally accepted and published industry standards. Telecert ensures that audits are conducted for all PKI functions regardless of how or by whom the PKI components are managed and operated. All audit related costs are the responsibility of Telecert.

8.1 Frequency or Circumstances of Assessment

Telecert shall submit to the PMA a CP Compliance Attestation each year by February 15th based on either an independent auditor's or an independent department of Telecert's assessment of the policy compliance of Telecert.

In addition, if requested by the PMA, Telecert shall submit to the PMA a CP Compliance Attestation for a specific period of time. The CP Compliance Attestation shall include the following:

- Confirmation of compliance with the Certificate Policy standards for infrastructure, security, and business process management;
- Identification/notification of any security breach incidents in any environment supporting the STI-CA; and
- Identification/notification of any material changes in technology architecture or business processes supporting the STI-CA.

8.2 Identity / Qualifications of Assessor

External audits must be conducted by a Qualified Auditor who possesses the following attributes:

- Evidenced expertise in conducting compliance audits.
- Comprehensive understanding of the CA's CP/CPS.
- Consistent engagement in compliance audits as part of their routine business operations.
- Relevant professional background and certifications.
- Specialization in PKI subject matter.

8.3 Assessor's Relationship to Assessed Entity

The selection of the auditor occurs on a yearly basis and must either be an external private firm with no affiliation to Telecert, or it must maintain a significant organizational separation from said entities to guarantee an impartial and unbiased evaluation.

In either scenario, the auditor must not have participated in the creation or upkeep of the entity's CA Facility or CPS. The ultimate responsibility for confirming the auditor's fulfillment of the CPS-specified criteria lies with the PMA.

8.4 Topics Covered by Assessment

The assessment will encompass the documented practices of Telecert, the integrity of Issuing PKI operations, and adherence to governing CP requirements, as required by industry standards. The audit will cover each issuing CA (root certificate or subordinate) is compliant with the STI-PA's CP.

8.5 Actions Taken as a Result of Deficiency

In the event of an audit revealing a substantial failure to comply with applicable laws, this CPS, the CP, or any contractual commitments linked to Telecert's services, the following steps will be taken:

- The auditor will document the identified discrepancy.
- The auditor will promptly inform both Telecert and the PMA of the discrepancy.
- Telecert and the PMA will collaborate to establish a corrective plan for addressing the non-compliance.
- Telecert will submit the proposed corrective plan to the PMA for approval.
- If deemed necessary, the PMA may require further actions to rectify significant issues arising from the non-compliance, which may include the revocation of affected Certificates.

8.6 Communication of Results

Within a 30-day period following the conclusion of the audit and the identification of necessary corrective actions, the PMA, along with any other entities entitled by law, regulation, or agreement, will be furnished with the details of the corrective measures.

Telecert publishes letters confirming compliance with annual external Audit Reports in the legal Repository, accessible at https://www.telecert.com/repository.

9 Telecert SHAKEN OTHER BUSINESS AND LEGAL MATTERS

9.1 Fees

9.1.1 Certificate Issuance or Renewal Fees

Telecert has the right to charge fees for certificate products and renewal services.

9.1.2 Certificate Access Fees

Telecert does not charge for revocations, certificate access, or CRLs.

9.1.3 Revocation Access Fees

Telecert does not charge for revocations, certificate access, or CRLs.

9.2 Financial Responsibility

9.2.1 Insurance Coverage

No Stipulation.

9.2.2 Other Assets

No Stipulation.

9.2.3 Insurance or Warranty Coverage

No Stipulation.

9.3 Confidentiality of Business Information

9.3.1 Scope of Confidential Information

Confidential information encompasses at a minimum, but is not limited to, materials concerning business and marketing plans, intellectual property, financial records, research findings, operational methodologies, sensitive details like PINs/passwords/combinations and cryptographic keys, data obtained from third parties, restricted personal information, and data acquired from third parties.

9.3.2 Information Not Within the Scope of Confidential Information

Any information not specified as confidential in Section 9.3.1 shall be considered public.

9.3.3 Responsibility to Protect Confidential Information

Telecert, along with all employees, agents, and contractors, bears the responsibility of safeguarding confidential information. To achieve this, Telecert implements comprehensive training and enforcement programs for all personnel, ensuring the maintenance and protection of confidential information.

9.4 Privacy of Personal Information

9.4.1 Privacy Plan

All personal information utilized within the Telecert PKI is safeguarded in compliance with Telecert's Privacy Policy. The Privacy Policy is available for review at https://www.telecert.com/privacy-policy

9.4.2 Information Treated as Private

Personally identifiable information received from certificate Applicants, which is not typically included in a Certificate, is treated as private. Telecert will conduct training and regular retraining, as outlined in Section 5.3 concerning Personnel Security Controls, to ensure secure handling and access to private information by all personnel.

9.4.3 Responsibility to Protect Private Information

All Telecert personnel are bound by policies and confidentiality agreements, mandating the proper handling of private information in accordance with the Telecert Privacy Policy

9.4.4 Disclosure Pursuant to Judicial or Administrative Process

Telecert may, as required by law or regulation, disclose private information without prior notice to Applicants or Subscribers.

9.5 Intellectual Property Rights

No stipulation.

9.6 Representations and Warranties

9.6.1 STI-CA Representations and Warranties

Telecert extends the following certificate warranties to Certificate Beneficiaries upon issuance:

1. The Subscriber party to the Subscriber Agreement or Terms of Use for the Certificate.
2. Application Software Suppliers with whom the Root CA has a contract for Root Certificate inclusion in their distributed software.
3. All Relying Parties who reasonably rely on a Valid Certificate.

Telecert assures Certificate Beneficiaries of compliance with its CPS throughout the Certificate's validity period.

Responsibility for the performance, warranties, liabilities, and indemnification obligations of Subordinate CAs under this CPS lies with Telecert.

9.6.2 Relying Party Representations and Warranties

No stipulation.

9.6.3 Subscriber Representations and Warranties

No stipulation.

9.7 Disclaimers of Warranties

Unless explicitly stated in Section 9.6.1 STI-CA Representations and Warranties, all Certificates, related software, and services are provided on an "as is" and "as available" basis.

Telecert disclaims all express and implied warranties not specified in the CP, including but not limited to warranties of merchantability, fitness for a particular purpose, and non-infringement, to the maximum extent permitted by law.

9.8 Limitations of Liability

Telecert and any Delegated Third Party may allocate liability through contractual agreements for delegated tasks. However, Telecert remains fully responsible for all parties' performance according to this CPS, as if no delegation occurred.

If Telecert has issued and managed the Certificate in accordance with this CPS, liability disclaimers may apply to the Certificate Beneficiaries and other third parties for losses resulting from the use or reliance on the Certificate beyond the scope specified in Telecert's CPS. In case Telecert has not issued or managed the Certificate in compliance with its CPS, Telecert may seek to limit its liability to the Subscriber and Relying Parties through appropriate means for any claims, losses, or damages resulting from the use or reliance on such Certificate, regardless of the cause of action or legal theory involved. Should Telecert choose to limit its liability for non-compliant Certificates, the limitations will be included in Telecert's CPS.

9.9 Indemnities

9.9.1 Indemnification by an Issuing STI-CA

No stipulation.

9.9.2 Indemnification by Subscribers

To the extent permitted by law, each Subscriber shall provide indemnification to Telecert, its partners, cross-signed entities, and their respective directors, officers, employees, agents, and contractors against any loss, damage, or expense, including reasonable attorney's fees, arising from:

1. Any misrepresentation or omission of material fact by the Subscriber, regardless of intent.
2. The Subscriber's violation of the Subscriber Agreement, this CPS, or applicable laws.
3. The compromise or unauthorized use of a certificate or Private Key due to the Subscriber's negligence or intentional acts.
4. The Subscriber's misuse of the certificate or Private Key.

9.9.3 Indemnification by Relying Parties

To the extent allowed by law, each Relying Party shall indemnify Telecert, its partners, cross-signed entities, and their respective directors, officers, employees, agents, and contractors against any loss, damage, or expense, including reasonable attorney's fees, resulting from the Relying Party's:

1. Breach of the Relying Party Agreement, an End-User License Agreement, this CPS, or applicable laws.
2. Unreasonable reliance on a certificate.
3. Failure to verify the certificate's status before use.

9.10 Term and Termination

9.10.1 Term

This version of the Telecert CPS is effective until otherwise communicated through the Telecert repository. (https://www.telecert.com/repository)

9.10.2 Termination

This CPS and any subsequent modifications will remain valid until they are superseded by a more recent version.

9.10.3 Effect of Termination and Survival

Telecert will publicly announce any CA termination through its public repository and notify the Application Software Suppliers with whom it has a Root Certificate distribution agreement.

9.11 Individual Notices and Communications with Participants

Telecert acknowledges receipt of notices pertinent to this CPS at the designated locations outlined in Section 1.6.2 of this CPS. Notices are regarded as effective upon receipt of a valid and digitally signed acknowledgment from Telecert. In cases where no acknowledgment is received within a five-day period, the sender is required to reissue the notice in physical form, sending it to the address specified in Section 1.6.2 via a courier service with delivery confirmation or through certified/registered mail with prepaid postage and requested return receipt.

Alternate methods of notice may be accepted as defined in Subscriber Agreements established by Telecert.

Furthermore, Telecert commits to informing the PMA at least one month prior to implementing any planned changes or updates that could impact the Telecert SHAKEN PKI operational landscape or compliance with the CP. These changes include, but are not limited to:

1. Introducing or modifying Root CAs.
2. Implementing additional CPs at the Root CA level.
3. Altering Certificate issuance procedures.
4. Concluding operations or transitioning ownership of Root CAs.

9.12 Amendments

9.12.1 Procedure for Amendment

Telecert's Policy Management Authority (PMA) holds the authority to enact necessary amendments to this CPS.

Any significant changes made to the Telecert CPS will be duly noted in a version control table integrated into this document.

Minor changes, such as grammatical, syntactical, or spelling corrections, may, at Telecert's discretion, be implemented without prior notice by adding a sub-minor number to the document OID.

Annually, if no other modifications are made, the document's version number will be incremented, and a dated changelog entry will be added to indicate the update.

9.12.2 Notification Mechanism and Period

Telecert posts CPS revisions to its Repository. Telecert does not guarantee a comment period and may make changes to this CPS without notice

9.12.3 Circumstances Under which OID Must be Changed

Telecert retains the right to amend the content of any published CPS. Major changes to the Telecert CPS will also result in the alteration of the OID published through the Telecert repository.

9.13 Dispute Resolution Procedures

Parties are required to notify Telecert and attempt to resolve disputes directly with Telecert before resorting to any dispute resolution mechanism, including adjudication or any type of alternative dispute resolution.

9.14 Governing Law

The laws of the state of Texas govern the interpretation, construction, and enforcement of this CP/CPS and all proceedings related to Telecert's products and services, including tort claims, without regard to any conflicts of law principles. The state of Texas has non-exclusive venue and jurisdiction over any proceedings related to this CP/CPS or any Telecert product or service.

9.15 Compliance with Applicable Law

This CPS adheres to all relevant laws and regulations, including United States restrictions on the export of software and cryptography products.

9.16 Miscellaneous Provisions

9.16.1 Entire Agreement

No stipulation.

9.16.2 Assignment

Entities operating under this CPS are prohibited from assigning their rights or obligations without obtaining prior written consent from Telecert. Unless explicitly specified in a contract with a party, Telecert does not offer notice of assignment.

9.16.3 Severability

In the event that a competent court or tribunal deems any provision of this CPS as invalid or unenforceable, the remaining portions of the CPS will continue to be both valid and enforceable. Every provision within this CPS that involves liability limitation, warranty disclaimer, or damage exclusion is distinct and can stand independently from any other provision.

9.16.4 Force Majeure

No stipulation.

9.17 Other Provisions

No stipulation.

Certificate of Signature and Timestamp

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