

Conformity Assessment of Trust Service Modules using the example of Videoident

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PRINCIPLES OF CONFORMITY ASSESSMENT

- Different services can be part of the TSP operation, e.g. the following for TSPs issuing certificates:

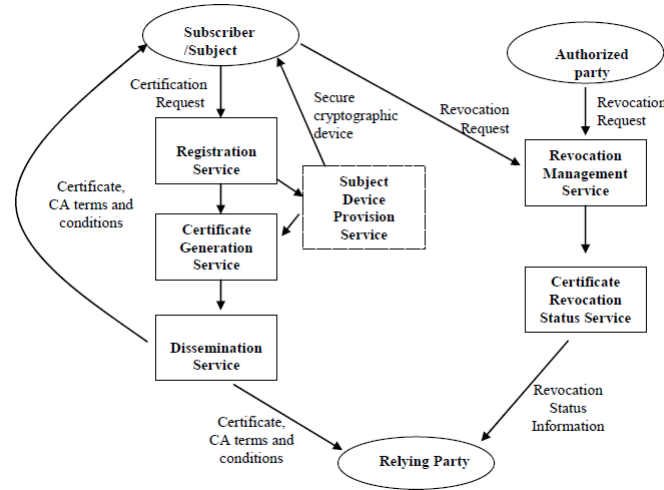
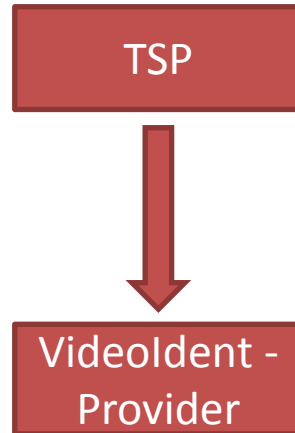


Figure 1 from ETSI EN 319 411-1, V1.1.1

- All services of TSP operations need to be covered during conformity assessment

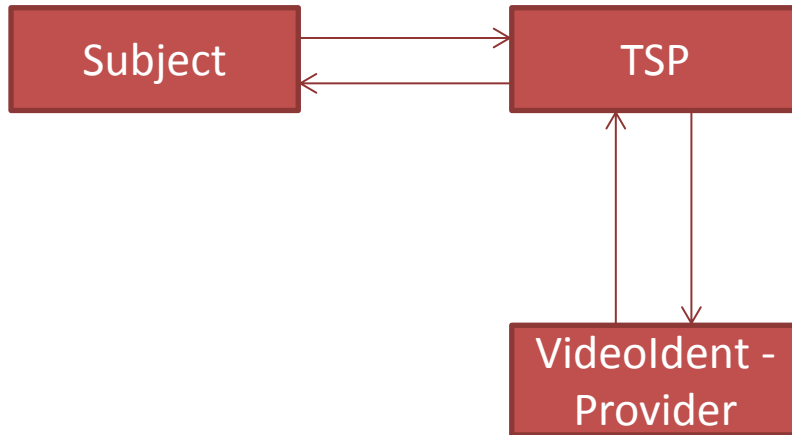
MOTIVATION FOR CONFORMITY ASSESSMENT OF MODULES

- TSP wants to outsource certain services to specialized service providers
- Service providers want to specialize on certain services and offer these to TSPs
- Typical example: Subject identification (as part of the registration procedure) shall be outsourced to identification service providers, e.g. Video-based Identification Service



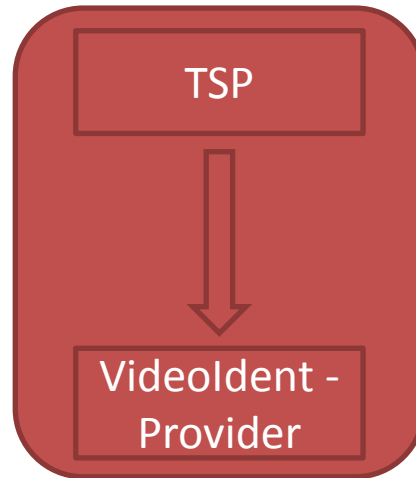
IMPLEMENTATION OF MODULES USING THE EXAMPLE OF VIDEOIDENT

- Subject requests certificate from the TSP
- TSP re-directs subject to an video identification service provider
- Service provider performs video identification of the subject and submits result to the TSP
- TSP finishes registration procedure and issues certificate



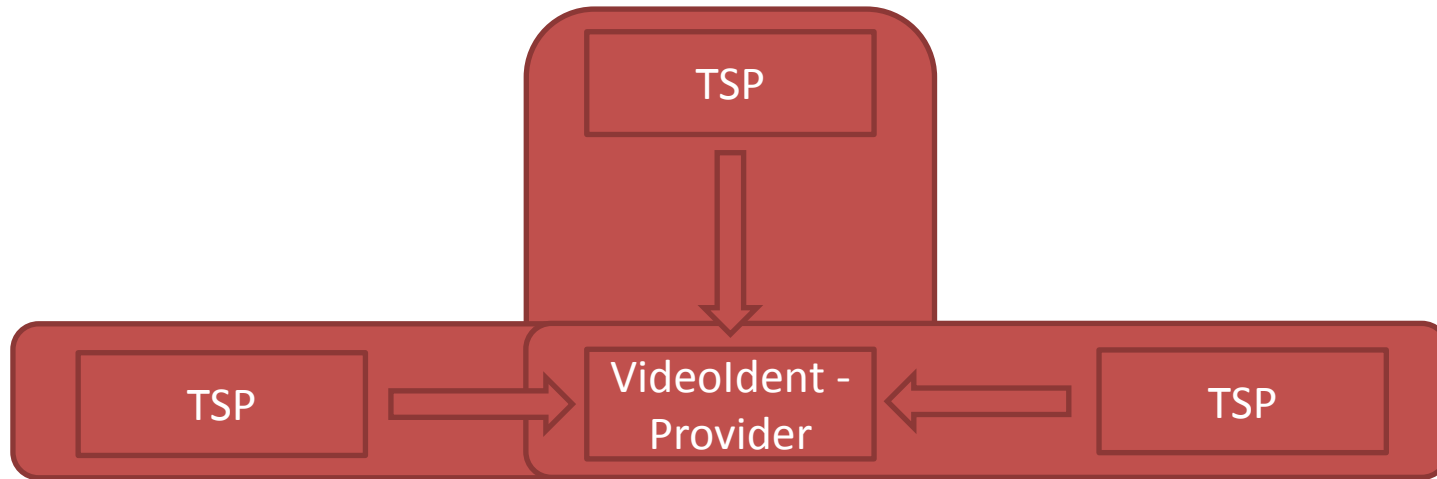
MOTIVATION FOR CONFORMITY ASSESSMENT OF MODULES

- Traditional Scenario:
Service provider is covered during conformity assessment of the TSP



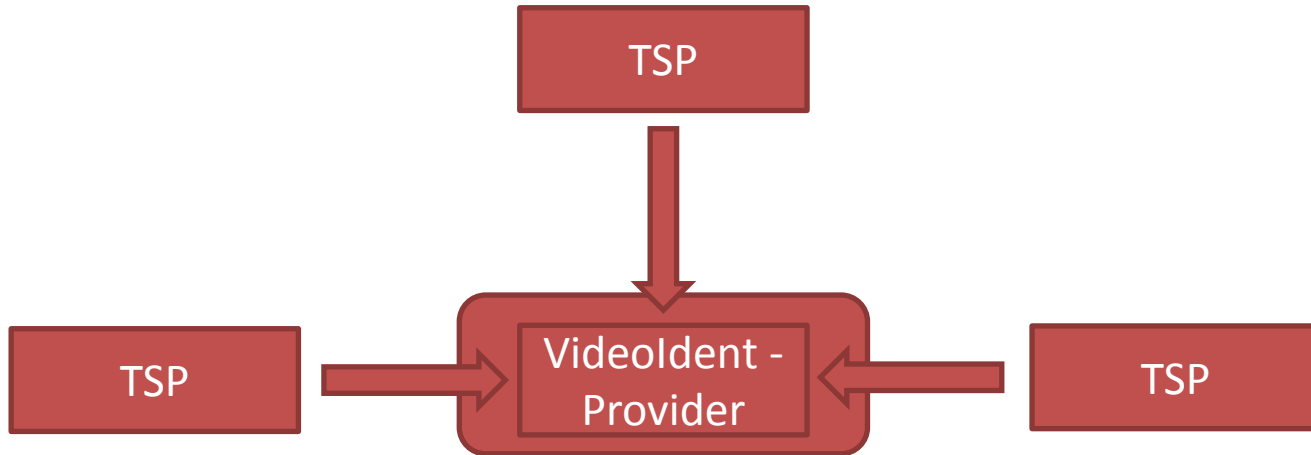
MOTIVATION FOR CONFORMITY ASSESSMENT OF MODULES

- Problem:
Service provider is assessed again for every additional TSP



INTRODUCTION OF TRUST SERVICE MODULES

- Idea:
 - Service provider provides a defined interface and is assessed according to the applicable requirements and receives an attestation thereof (“module conformity assessment report”).

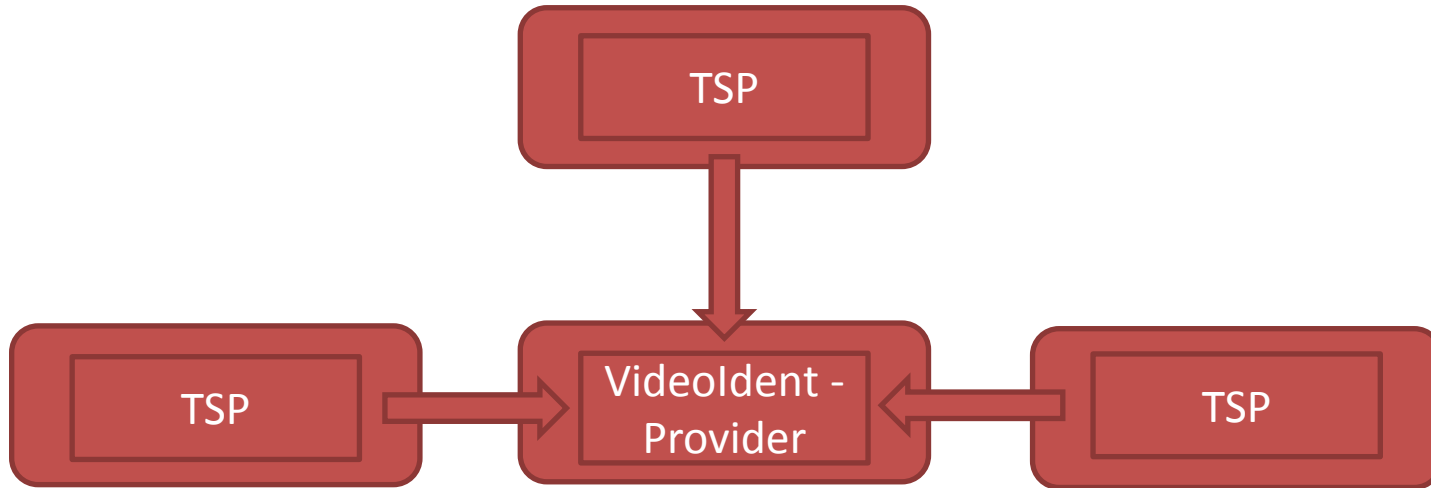


INTRODUCTION OF TRUST SERVICE MODULES

- Assessment requirements for video-based identification procedures
 - eIDAS, Art. 24, number 1
 - ETSI EN 319 401
 - ETSI EN 319 411 -1 / -2, section 6.2.2
 - German Federal Financial Supervisory Authority (BaFin) – Circular 3/2017 (GW) – video identification procedures

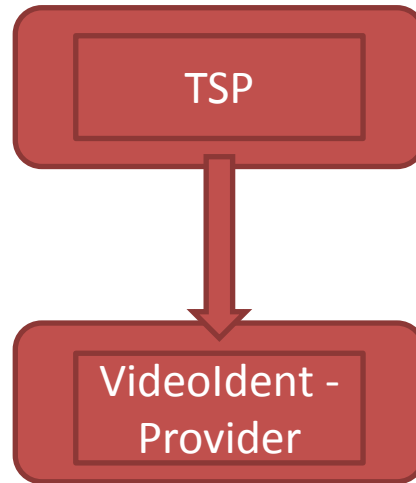
INTRODUCTION OF TRUST SERVICE MODULES

- Idea:
 - TSPs can implement the defined interface and only the correct implementation of the interface needs to be covered during the assessment of the TSP



INTRODUCTION OF TRUST SERVICE MODULES

- Advantage
 - Service provider needs to be assessed only once, significantly reducing audit efforts
 - TSP benefits from easier inclusion of already assessed modules



INTRODUCTION OF TRUST SERVICE MODULES

- Problems / Open Questions
 - Module conformity assessment is not explicitly defined in eIDAS
 - Agreement between European CAB's is necessary to mutually accept module CAR's
 - Minimum requirements on module CAR in order to enable mutual acceptance
 - ACAB-c is established for CAB coordination and can take a role on this
 - Supervisory Bodies must be convinced to accept this concept as well
 - Distribution of liability needs to be clarified
 - CAB shall be responsible for their own assessments but not for foreign modules
 - Within Germany, such agreement between different CAB's and with SB is already in place



SUMMARY

- Offering of specialized modules for TSP is getting increasingly popular
- Redundant conformity assessments with each TSP are inefficient
- Conformity assessment of modules allows to perform a single module assessment and include it into multiple TSP conformity assessments
- Open points shall be solved between CAB's, SB's and ACAB-c

Thank you very much for your attention!

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