

LIAISON STATEMENT

Title: Request for Clarification on Use of organizationIdentifier in subjectDN of EV Certificates

Date: 2018-04-18

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To: CA Browser Forum and web browsers providers

Copy to:

Response to:
(if applicable)

Attachments:
(if applicable)

Under Regulation EU 910/2014, on electronic identification and trust services, it is required that “Qualified Website Authentication Certificates” (QWACs) include an official registration number. This may be different from the “Number assigned to the Subject by the Incorporating or Registration Agency”, as required by the EV Guidelines section 9.2.6 to be carried in the subjectDN serialNumber. In particular under EU payment services Directive (EU) 2015/2366, and article 34 of the supporting Commission Delegated Regulation (EU) 2018/389, this is required to be an Authorisation Number relating to approval to a payment service provider to operate payment services.

ETSI have standardised the use of the CA Browser Forum “Guidelines For The Issuance And Management Of Extended Validation Certificates” (EV Guidelines) for QWACs in EN 319 412-4 and TS 119 495 specifying the use of X.520 organizationIdentifier (OID 2.5.4.97) in which the above mentioned Authorisation Number is included in order to meet the above legal requirements.

ETSI requests clarification that the requirements for the subject information in EV certificates specified in clause 9.2 allow for the inclusion of X.520 organizationIdentifier. In particular, EV Guidelines sub-section 9.2.8 states:
“... CAs ... SHALL NOT include any Subject Organization Information except as specified in Section 9.2.

Does the reference to 9.2 in this sub-section include “other Subject Attributes”?

In addition, do web browser providers have objections to the use of X.520 organizationIdentifier in website certificates, and if yes explain why?

References:

Final draft ETSI TS 119 495: "Electronic Signatures and Infrastructures (ESI); Sector Specific Requirements; Qualified Certificate Profiles and TSP Policy Requirements under the payment services Directive 2015/2366/EU"

https://docbox.etsi.org/ESI/Open/Latest_Drafts/TS_119495v007-public.pdf

ETSI EN 319 412-4: "Electronic Signatures and Infrastructures (ESI); Certificate Profiles; Part 4: Certificate profile for web site certificates"

http://www.etsi.org/deliver/etsi_en/319400_319499/31941204/01.01.01_60/en_31941204v010101p.pdf

Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0910&from=EN>

Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L2366&from=FR>