

Public Review: Resolution of Comments on Draft ETSI SR 019 530 v0.0.2

Rationalised framework of Standards for Electronic Delivery Applying Electronic Signatures

Foreword: Please note that the following disposition of comments is provided to the light of the current context of the m460 mandate, in particular with regards to Directive 1999/93/EC. It should be noted that such disposition should be reviewed to the light of the eIDAS Regulation.

Organization name	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	Resolution on each comment submitted
	4, 24		Technicl	<p>We very much welcome your initiative which should translate into the arrival of standards for interoperable electronic delivery services.</p> <p>On page 11 (and 24), you limit the scope of your analysis as you explain that you can not take private e-delivery solutions into consideration. We respect this given the variety of solutions. However, back in 2006, we [omissis] have already laid what we believe is a significant foundation of multi-provider services that are interoperable across providers and that can scale globally in an open network approach. Therefore, we would like to inform you about our efforts and experiences and invite you to engage in a dialogue. In particular, we have solved the key issues of the distributed service model that you describe on page 16. In contrast to the "4-corner model" which will most likely suffer from operational complexity (imagine managing n times m connections), [omissis] has invented a data clearing infrastructure and service as the interconnection layer to which all</p>		<p>The team thanks the comment provided by [omissis] and proposes to conduct exchange of information and even a call with their representatives for finding out more details of the technology described by [omissis] and the IPs owned in this field.</p>

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				<p>providers connect. This clearing layer has proven to be the appropriate means to managing the complexities that arise from the interoperability requirements between services. Your mention of a service-discovery agent (page 18) may indicate that you have a similar approach and architecture in mind for a distributed service model. Our model also satisfies the key requirements for electronic delivery in an international multi-jurisdiction setup.</p> <p>We are awaiting your response and are interested in engaging in a dialogue. Given our focus and the architectural innovation of the <i>[omissis]</i> architecture, we own significant IP in this domain. Therefore, we would also want to discuss how ETSI and future users could benefit from our IP in the connext of these upcoming standards.</p> <p>We look forward to hearing from you</p>		
				<p>Dear Juan Carlos Cuellas,</p> <p>I'm resuming contact to be in touch with the advances you could have made in Electronic Certified Mail standards.</p> <p>Have you already published the TS 102 640?</p> <p>Is there anything else new?</p> <p>Thank you so much.</p>		<p>The team thanks for the interest about the ETSI specifications on Registered Electronic Mail. This comment/question was submitted via personal email, which was properly answered in due time. However, as the new version of the SR 019 530 will propose certain changes in the standards related to REM, it is proposed to send a new message to <i>[omissis]</i></p> <p>Proposed action: to send an email to <i>[omissis]</i> highlighting the interest that for them will have to read the new version of the SR 019 530 as it</p>

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						includes proposals for implementing some changes in the specifications related to Registered Electronic Mail
				See Annex 1 to this document. The comments was a 5 pages document, impossible to embed within this column cells.		<p>The team deeply thanks [omissis] the interest shown in the work being performed and the description of the activities being held within [omissis]. The team certainly considers of extremely great relevance this work and its potential impact on the framework of standards being proposed.</p> <p>Proposed actions:</p> <ol style="list-style-type: none"> 1. To formally answer to the comment deeply thanking for the interest and the details provided. 2. Propose a more extensive exchange of information regarding the role of the specifications being built by [omissis] and their potential role within the framework of standards for Electronic Delivery. 3. If not covered by current formal liaison statements or agreements between [omissis], draft a liaison statement with [omissis] 4. To identify representatives of [omissis], fully aware and knowledgeable of the specifications developed and under development within this field so that the STF may also strengthen their cooperation [omissis]. 5. Ensure proper treatment of the UPU/CEN specifications, not discarding the worthiness of conducting joint calls/meetings with representatives of these entities.
	6.3-6.5		General	Discussion in [omissis] on e-Delivery Service Model, roles as well as Evidences details, copied below	To be considered/discussed by STF 459	The team is grateful for the interest shown by [omissis] and is eager to get inputs on the progress within this project regarding the issues identified in the comment, as they are essential for the building up of a set of standards that properly

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						<p>solve the problems raised for the efficient provision of Electronic Delivery Services.</p> <p>Annex B provides copies of emails exchanged between members of [omissis] and some member of the STF dealing with the issues identified within the comment. These copies were also included within the document arrived to the STF.</p> <p>Proposed actions:</p> <ol style="list-style-type: none"> 1. To formally answer to the comment deeply thanking for the interest, showing eagerness of the STF for being acquainted of any progress on the mentioned issues that [omissis] does. 2. Ensure internally that this progress is properly monitored (the team has experts that are also involved within [omissis] tasks) and dealt with, not discarding the conduction of joint calls/meetings if it is considered worth.
	Annex A.4		General	<p>The [omissis] project has submitted it's specifications [omissis] where the specifications are being developed to fit into a broader scope. The [omissis] defines a 4-corner architecture where parties can exchange business documents in a secure and reliable way, supporting endpoint and capabilities discovery as also described in ETSI SR 019 530. The [omissis] has recently approved a [omissis] specification as Committee Draft Specification. This document is a "next generation" specification from the original [omissis] in that it uses DNS to facilitate the discovery of metadata services [omissis].</p>		<p>The STF deeply thanks this comment and the information provided. Indeed the STF was aware of the work being carried within the [omissis], especially within the area of the 4-corner architecture and the capabilities discovery services, as well of the fact that the TC is has produced the Business Document Metadata Service Location V1.0 specification. The STF is also aware of existence of a formal liaison between the [omissis], under which regular exchange of information and comments may be conducted.</p> <p>Proposed actions:</p> <ol style="list-style-type: none"> 1. To formally answer to the comment deeply

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						<p>thanking for the interest, showing eagerness of the STF for being acquainted of any progress on the mentioned issues that <i>[omissis]</i> does.</p> <p>2. Ensure internally that this progress is properly monitored (some members of the team are also members of <i>[omissis]</i>) and dealt with, not discarding the conduction of joint calls/meetings if it is considered worth.</p>

	3.1	line 209ff	technical	<p>The definition of e-Delivery requires evidence, but proof of receipt (and other) may be provided in another way – just like the PEPPOL Audit Trail.</p>	<ul style="list-style-type: none"> • Differentiate between e-Delivery and Registered e-Delivery (like e-mail vs. registered e-mail) • Move the requirement of providing evidence from e-Delivery to Registered e-Delivery <p>Drawback: This may or may not require modifying other definitions, like QeDS: “a [registered] electronic delivery service which ...”</p>	<p>While it is true that the distinction is made between Electronic Mail and Registered Electronic Mail, based on the provision, by this last one, of electronic evidences of the occurrence of certain relevant events, the team did not coined the term “Registered Electronic Delivery” due to the fact that the current draft of the Regulation “on electronic identification and trusted services for electronic transactions in the internal market”, which may be found in different languages and formats at http://eur-lex.europa.eu/Notice.do?checktexts=checkbox&checktext=checkbox&val=679649%3Acs&pos=1&page=1&lang=en&pgs=10&nbl=1&list=679649%3Acs.&hwords=&action=GO&visu=%23texte&language=en, formally defines the term “Electronic Delivery” as:</p> <p>“(28) ‘electronic delivery service’ means a service that makes it possible to transmit data by electronic means and provides evidence relating to the handling of the transmitted data, including proof of sending or receiving the data, and which protects transmitted data against the risk of loss, theft, damage or any unauthorised alterations”</p> <p>Please note the “provides evidence relating to the handling of the transmitted data..”. The team decided, since the very beginning to be fully aligned with the terminology and the semantics expressed within the Regulation, as a way of avoiding misinterpretations and confusion among stakeholders. The team is equally aware that this is only a draft version of the aforementioned regulation, and if a change in the terminology is implemented, in the direction that the comment points to, the team will be coherent with the decision aligning the terminology and the semantics of the Regulation within the SR 019 530</p> <p>Action proposed:</p> <ol style="list-style-type: none"> 1. Discuss internally whether this distinction between the two terms would be worth and check whether there is any possibility of providing feedback into the process of the production of the final draft of the Regulation. 2. None that may be implemented by the team as such apart from the former one, as no news are publicly available on the changes being proposed and implemented on the referenced Regulation.
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	A	headings	editorial	minor notation corrections	change eCODEX to e-CODEX, change ePSOS to epSOS, change e-Trustex to e-TrustEx	Accepted
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Annex A. Comments by [omissis]

Dear Ladies and Gentlemen,

In response to your document SR 019 530 V 0.0.2 (2013-09) and within the open time to reply to the public review until Nov. 15th, 2013; [omissis] would like to comment and indicate certain developments in line with electronic delivery in the broad sense, extending the postal service provision into the digital world.

With full liberalization of the European Market for postal services in 2012, most postal operators have understood that the key to their future lies in the markets upstream & downstream of the core postal service provision.

The way in which society communicates has continued to change fundamentally over the last ten years. Hybrid mail – mail delivered using a combination of electronic and physical delivery – is one manifestation of this change.

However, previously hybrid means of communication had **not been covered by the postal universal service obligation**. As a consequence, work undertaken by [omissis] had not been covered by the European Commission's mandate to standardize postal services as specified by the postal framework directive.

In 2008 this changed.

The Universal Postal Union (UPU) laid the foundations for **extending the postal service provision into the internet**.

[omissis] then actively ensured that the spirit and aim behind the liberalization of the European market for postal services would not be jeopardized by the arrival of new and exclusive areas reserved solely to the incumbents.

Consequently, [omissis] has sought to ensure **equal and non-discriminatory access** to hybrid postal services and has converted [omissis]. Moreover, it is continuing to revise existing standards and plans to develop new technical standards for hybrid mail.

Creating Hybrid Mail Standards

Hybrid mail, as defined by [omissis], is an electronic-based postal service.

The sender posts the original message in either a physical or an electronic form and the message is then electronically processed and converted into a letter-post item for physical delivery to the addressee.

Where national legislation permits, and where the sender or the addressee requests, the postal operator effecting the delivery may convert the original transmission either into non-physical means (such as fax, email, or SMS) or into multiple means.

Where delivery is physical, the information is generally transmitted by electronic means over the furthest possible distance, before being physically reproduced at premises as close to the recipient's address as possible.

[omissis].

Most communications, even letter-post items, have their origin in digital media. Letters are overwhelmingly composed and written using IT- based output systems.

So it is true to say that “**the original is digital**” and is stored and archived digitally. The printed mail piece is simply a copy.

Therefore more and more postal services providers are extending their core postal service offerings into the upstream markets. Hybrid mail has become a vital value proposition for postal services and output management providers.

Extending Standards to Secured Electronic Postal Services

The first step was to define hybrid mail.

The second step was to extend standards to cover **Secured electronic Postal Services (SePS)**.

The progression from a digitally composed mail piece to secured electronic distribution, whether driven by governments or postal services, is a process of evolution rather than revolution.

Most would say that this evolution is due for completion sooner rather than later.

Therefore it comes as no surprise that in countries where third party players are large enough to have an impact on the letter-post market, national postal services have decided to take the bull by the horns and actively drive forward the evolution from physical mail to secured electronic mail themselves.

[omissis] supports these developments by actively participating in converting global postal standards in this field into **European Postal standards**

[omissis]

Standards Guarantee Authenticity, Integrity & Trust

The core service provision of postal providers offers a unique proposition to the two parties involved in any letter-post communication – **authenticity, integrity & trust**.

These principles are safeguarded globally by national and international legislation. This is the **Trusted Third Party concept** that postal service providers will use as the cornerstone for future service offerings.

Enshrined in the postal service provision, this cornerstone of the postal service obligation was extended [omissis] to cover email.

[omissis]

[omissis] was also instrumental in transforming the ETSI REM (REM = registered E-Mail) standardization and providing technical standardization for any interoperability for a postal service provision extended to digital communication means.

This made e-delivery and certain aspects of electronic cross-border identification **interoperable**, supporting the evolution of the postal network which is by definition universal and becoming increasingly multi-channel.

Reverse Hybrid Mail - The 3rd Aspect of Current Standardization

Reverse hybrid mail will specify the technical processes and means for converting physical mail into digital form for delivery to **Postal Electronic Mailboxes**.

The electronic mailbox (e-mailbox) in the digital world will serve a similar purpose to the traditional mailbox in the physical world.

Now, it could be argued that everyone online already has an e-mailbox. But this is only partly true.

At the moment the legal obligations associated with a physical mailbox are not yet valid for e-mailboxes.

However, as you read this, posts globally are going through the evolutionary process of adopting the concept of **Postal Electronic Mailboxes**.

These developments are based on international standards and principles aimed at establishing global SePS networks, networks which will run parallel to the physical networks established by postal service providers around 125 years ago.

The concept of a postal electronic mailbox was enshrined in the UPU's **letter-post convention** of June 2011.

A postal electronic mailbox enables:

- Sending of electronic messages by an authenticated mailer
- Delivery to the authenticated addressee

- Access, management and storage of electronic messages and information by the authenticated addressee

As a result, and to ensure the equal and non-discriminatory access to reverse hybrid postal services, [omissis] has begun work on standardizing the processes and technologies already in use. The results and first drafts will be ready by the end of 2013.

New Work Items for 2013 / 2014

As delivery of mail and addresses (sender and recipient identification) becomes fully multi-channel, extending postal service provision to new means of digital communication at national and global level requires new standards.

That said, standardization within [omissis] goes hand in hand with global postal standardization. This is particular true for secured electronic postal services, such as:

- Postal electronic Identification
- Electronic postal certification mark (EPCM [eSeal])
- Postal registered electronic mail
- Postal electronic mailbox

This becomes even more important as personal and sensitive data, profiles and preferences all need to be protected, authenticated and secured.

Data is the new commodity in a market-driven economy. Data-protection legislation, copyright and consumer protection are increasingly changing the way we communicate.

Across the world states and business are tackling the issue of identification in order to know who their clients are, and to ensure that people only get access to the information and services to which they are entitled.

Yet again, postal services find themselves in the important role of a trusted mediator.

It is therefore no surprise that the UPU has developed a sector specific data protection framework, covering the data related delivery issues¹.

In addition the UPU launched in 2012 the first ever governmental sponsored generic TopLevelDomain, to give the next generation global postal network, in particular hybrid and electronic related delivery issues a stable and highly secured governance framework. This gTLD is “.post”. DOT POST provides an DNSSEC authenticated web space for postal e-delivery and eCommerce.

To bring the current work of the EU and in particular the work in field of the eIDAS in perspective with work already been done by the UPU extending the postal service provision into the digital world, see the figure drawn up below:

¹ Universal Postal Union, Convention as adopted by the 192 member states, in force as of Jan 1st 2014:

Article 11bis; Processing of personal data:

1 Personal data on users may be employed only for the purposes for which they were gathered in accordance with national legislation.

2 Personal data on users shall be disclosed only to third parties authorized by applicable national legislation to access them.

3 Member countries and their designated operators shall ensure the confidentiality and security of personal data on users, in accordance with their national legislation.

4 Designated operators shall inform their customers of the use that is made of their personal data, and in particular, of the purpose for which they have been gathered.

	UPU	Secured ePostal Services	PeID (UPU's P46)	EPCM (UPU S43b)	PrEM (UPU S52)	DOT POST
EU						
eTrust Services		global if, only national				
eID			global only national			
eSeal				global if, only national		
eDelivery					global if, only national	
Web site authentication						global if, only national

Work done by the UPU, supported by 192 member states, enshrined in the UPU Convention

Work proposed (not yet done) by the European Commission –eIDAS is intended to be a European-wide regulation (directly applicable EU law). Adoption by June 2014?

: Level of implementation within the UPU / postal environment

The work in the field of e-delivery in a broad sense, is well established on a global level. It is fair to say that global standards are in place, already well tested and deployed globally. This is especially true, when cross boarder e-delivery, e-identification or even international hybrid mail is involved.

In addition a global e-Seal framework was established and work on a global Postal e-Identification framework is under preparation and will be established in the very near future.

[omissis]

Annex 2. Exchange of emails included within the document including comments from *[omissis]*

Draft of generic eDelivery use case provided by *[omissis]*, commented from point of view *[omissis]* (pasted at the end).

Discussion on this proposal:

[omissis]

Dear *[omissis]*, thx for this initiative. Actually, it reminds me very much on the according SPOCS eDelivery description, see http://joinup.ec.europa.eu/site/spocs/eDelivery/SpecDocuments/SPOCS_D3.2_V2.0.pdf section 3.1 Cross border/solution eDelivery message flow. This sequence diagram is a little more detailed - it respects evidences may already be issued by transport infrastructures of sender/recipient (may be in other formats than REM, but comparable functionality) and the need of mutual gateway authentication (via TL in the SPOCS case). I would like to propose to bring together our both descriptions. One step not clear in both approaches: Address resolution using mechanism like SML/SMP. ...

[omissis]

[omissis], many thanks to initiate this discussion again in Basecamp. I provided some comments to your file directly (using the Word commenting tool).

[omissis], I did read the SPOCS D3.2 section 3.1, as well as the

ETSI TS 102 640-2 V2.1.1. They are both targeted to a mailbox-style exchange. Moreover it seems that the REM has a coded set of clauses that are used for evidence reporting (à la Message Disposition Notification) thus defining an asynchronous approach. In these clauses there are no mandatory audit specifications (used within eHealth and defined in rfc3881). How extensible is REM? Can we tailor it to report the data structure of the rfc3881? Can we use REM in non-asynchronous (read: synchronous :-)) MEPs? You are completely right: the eSENS eDelivery MEP is extremely similar to the SPOCS's MEP, where data is flowing "logically" from sender to recipient.

[omissis]

Hi *[omissis]*, good hint concerning TS 102 640-2 and RFC 3881. ETSI STF 459 is about to identify further eDelivery standardisation requirements, we published a first draft for public comments: http://docbox.etsi.org/ESI/Open/Latest_Drafts/sr_019_530_v000002-rf-for-e-d... - reviewing the Evidence details is one of the needs already identified. I'll put your points on the table at ESI. And I see no reason for not using evidences in synchronous scenarios - at least "rejection" type evidences should be supplied to signal details of fault situations.

According the discussion at ESI, the complete set of "Registered E-Mail" specifications will be a special case of e-Delivery, thus future specification on Evidences will be more general - plan is just to define bindings to a couple of transport protocols. And with respect to epSOS - the REM specification already covers two models: "store and forward" as well as "store and notify", the latter, in a more generic view, could cover message/document pulling scenarios like in ebXML RegRep, SPOCS eSAFE...