

Resolution of Comments on SR 019 530 V0.0.4 – 31 May 2014

Electronic Signatures and Infrastructures (ESI); 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
	Intro	§1	Editorial	<p>“e-Delivery in the stricter sense provided by the definition in clause 3”: It is a pity to refer to clause 3 to be able to read and understand the first § of this document. Would better explain in plain text the message of this sentence.</p> <p>“Comparing e-Delivery as defined with “registered paper mail”, it appears that it can be considered as a general purpose commodity”: This is meaningless, what is the link between “registered mail” and “general purpose commodity” ?</p>	<p>Rephrase 2nd sentence of 1st § as follows (or similarly):</p> <p>This is potentially true also when focusing on electronic data transmissions with evidences, since the need for integrity, confidentiality, non-repudiation, and indisputability of a message easily apply to a wide range of contexts.</p> <p>The present document focuses on such transmissions with evidences and defines “e-Delivery” accordingly (see clause 3).”</p> <p>I don’t like it either (at least a bit more than current text) as it still makes reference to the definition.</p> <p>Indisputability is better than provability.</p>	Accepted with changes
	Intro	Line 70	Editorial	Typo: accompanying	accompanying	accepted
	Scope	Lines 93 to 104	Editorial	This is not the place for a ToC explanation.	Delete lines 93 to 104	Accepted since replicated in Methodology clause. Add to Methodology the mention to the annexes.
	Scope	§1	Editorial	Reference [i.5] is named differently than in “Introduction - §2”.	Please align.	accepted
	2.2	[i.1] to [i.4]	Editorial	Missing links towards the documents	Please add link (URIs) to the published version of the documents on EC website.	Accepted
	2.2	[i.24]	Editorial	Outdated reference	Consider update to more recent W3C Recommendation of 11 April 2013 (http://www.w3.org/TR/xmlsig-core1/), XML Sig version 1.1 ;)	accepted

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	3.2	Line 268	Editorial	EN does not stand for European Norm but for European Standard	EN European Standard	accepted
	6	Line 399	Editorial	Typo: non –repudiation and extra “space” character right after it.	non-repudiation delete extra “space” character.	accepted
	6.1	Figure 1	Editorial	Figure deserves a few “labels” in relation with the different steps and arrows. Fill in yellow box with indication of evidence type (e.g. submission evidence).	e.g. 1: authenticates 2: prepares & submits message 3: creates (submission evidence) 4: etc.	Accepted limiting labels to the minimum
	6.1	Bullet 2.	Editorial	Typo: sumbits	submits	Accepted
	6.1	Lines 428-429	Editorial	The flow does not deal also with different	Similarly, the flow does not address the different	Accepted
	6.2	Figure 2	Editorial	Figure deserves a few “labels” in relation with the different steps and arrows. Fill in yellow box with indication of evidence type (e.g. submission evidence).	e.g. 1: authenticates 2: prepares & submits message 3: etc.	Accepted limiting labels to the minimum
	6.2	Lines 452-453	Editorial	“Since trust networks are normally slowly changing, the process is not necessarily synchronous.” Meaning ?	?	Accepted, will be rephrased in “Since trust networks are normally stable over long time periods and not changing frequently, the process does not necessarily need an on-line transaction”
	6.1, 6.2, 6.3, 6.4, 6.5	bullets	Editorial	Bulleted text: <ul style="list-style-type: none"> sometimes starts with capital letter sometimes not, sometimes ends with a “.” or a “;”, “,” or with nothing. 	Harmonise. (apply to each and every bullet)	accepted
	6.3	Figure 3	Editorial	Figure deserves a few “labels” in relation with the different steps and arrows. Fill in yellow box with indication of evidence type (e.g. submission evidence).	e.g. 1: authenticates 2: prepares & submits message 3: etc.	Accepted limiting labels to the minimum

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	6.4	Line 509 Line 511	Editorial	Consider replacing “requested”	“required” or “needed”	Accepted
	6.4	Line 521	Editorial	“Registration Authority”	“registration authority”	Accepted
	6.4	Line 522	Editorial	Typo: “evidencesas”	“evidences as”	Accepted
	6.4	Line 529	Editorial	“Time Stamping Authority”	“time stamping authority”	Accepted
	6.5	Line 547	Editorial	Footnote are forbidden, aren’t they?	Transform footnote into note.	Accepted
	6.5	Line 565	Editorial	“Files within this table” Files ?	Row? Lines?	Accepted – rows.
	6.5	Table 3	Editorial	Any meaning to the colour ? Red: missing ? Yellow: partly missing ?	Clarify	Accepted
	6.5	Table 3	Editorial	“Partially n scope” Partially ? (all over the table) + typo	“Partly in scope”	Accepted as “partially in scope”
	6.5	Line 585	Editorial	“Commission Decision 2010/425/EU” Correct reference is “CD 2009/767/EC as amended”	Replace “Commission Decision 2010/425/EU” by “CD 2009/767/EC as amended”	accepted
	6.5	Lines 586 & 587	Editorial	“Trusted Lists” x2	“trusted lists” x2	Accepted
	6.5	Line 605	Editorial	No reference provided to “STORK project”.	Add reference.	Accepted
	7	Line 628	Editorial	Typo: “form”	“from”	Accepted
	8.1 8.2	§1 & §2 title	Editorial / Technical	In order to meet its objectives and in particular simplification requirements for the standardisation landscape and its structuring, as well as requirements on the accessibility to the relevant standards and their presentation, the rationalised structure has been organised in the eSignature	Replace the whole clause 8.1 by: The rationalised structure for electronic signature standardisation document (TR 119 000 [i.16]) provides the framework for the x19 000 series of documents on electronic signature standards and specifies the schema for electronic signature standardisation. It is organised	Accepted: adopt new text move table 4 to 8.2 adopt new table 4 with some changes

Organization name	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	Resolution on each comment submitted
				<p>Rationalised Frameworks around 6 (functional) areas and 5 types of documentation, corresponding Area 5 to Trust Application Service Providers. [...]</p> <p>Fuzzy text, as well as the whole §1.</p> <p>§2 provided details are not relevant. Listed elements start by “0” and not by “1”. Last element is named “testing conformance and interoperability” and not “compliance”.</p>	<p>around:</p> <ul style="list-style-type: none"> 6 areas of standardisation (namely, signature creation & validation, signature creation and other related devices, cryptographic suites, trust service providers supporting e-signatures, trust application service providers and trust service status lists providers. An additional area, is gathering TR 119 000 [i16] as well as studies and other introductory deliverables related to the rationalised structure of electronic signature standards. 5 types of documents (namely guidance, policy & security requirements, technical specifications, conformity assessment, and testing conformance & interoperability). <p>Please refer to [i.16] for more details.</p> <p>The proposed rationalized structure for standards related to e-Delivery is expected to fit in Area 5 of the rationalized structure for electronic signature standardization [i.16], namely in the “trust application service providers” area. It is proposed to (re)organize Area 5 into the following sub-areas:</p> <ol style="list-style-type: none"> Data preservation (through signing) services; e-Delivery services; Registered electronic mail (REM) services. <p>Remove Table 4 from 8.1 and continue with:</p> <p>8.2 Proposed e-Delivery standards structure</p> <p>The documents for electronic signature standardisation for trust application service providers are summarised in table 4 with further details provided below.</p> <p>Insert <u>modified</u> Table 4</p> <p>Continue with descriptions</p>	
	8.1	Table 4 & proposed	Technical	Table 4 titles of documents are not in line with TR 119 000:	<p>Let’s assume the following:</p> <ul style="list-style-type: none"> Data preservation services and data 	Mostly accepted:

Organization name	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	Resolution on each comment submitted
		documents descriptions		<ul style="list-style-type: none"> Conformity assessment document titles; “Compliance” to be replaced by “conformance” 119 514 and 119 524 must be 119 524 and 119 534 respectively <p>More fundamentally, the proposed structure does not take into account whatever analysis with regards to the “data preservation (through signing) service (providers)” area.</p>	<p>preservation service providers:</p> <ul style="list-style-type: none"> It should be decided whether the rationalized framework will address all types of data preservation services and models or focus on data preservation through signing. 319 51x documents to be allocated to DP(ts) services and service providers: With the proposed structure for sub-areas in area 5 (i.e. 1. DP(through signing)S(P); 2 e-Delivery; 3. REM), in the event there would be a second or third (sub)category of DP(ts) services, they will be allocated sub-area #4, #5, etc. No recycling of previously allocated numbers for existing documents will be possible. Alternatively sub-part mechanisms can be used as well. <ul style="list-style-type: none"> Replace Table 4 by a table looking like the one provided below with remaining questions about how to address qualified e-Delivery and qualified REM technical specifications in 319 522 and 319 532 documents (see below) There are a lot of “might” and uncertainties with regards to the structure and sub-structure (parts) of the proposed documents. It would have been expected that the study would have gone deep enough to remove such uncertainties. A lot of simplifications and a reduction in the number of documents (parts) could have been expected from a deeper analysis. Alternatively a sentence could be added that a simplified structure or a reduction of the number of parts could be expected whenever applicable. 	<ul style="list-style-type: none"> data preservation is out of scope 319 5X3 titles: should be aligned with SR 119 000 “Compliance” replaced by “conformance” in 119 5X4 119 514 and 119 524 become 119 524 and 119 534 respectively uncertainties are implicit in the nature of the task, for two main reasons: <ul style="list-style-type: none"> the aim is to propose a structure of standards where different options already in place in the market could nicely fit together. since REM is now considered a subtype of Edelivery, there is a need to reassess requirements that appeared within REM but that actually could be general to any Electronic Delivery service. In case of full overlap, they might disappear from REM and be moved to Edelivery standards. 119 514 Testing conformance and interoperability on data preservation services won't be mentioned
	8.2	319 521 319 531	Technical	One can question the difference between qualified/non-qualified levels and other “different conformity levels” and “styles of operations”.	Clarify	mention to “conformity levels” will disappear from description of 319 521 and 319 531. “Styles of operations” is on a different level, so it makes sense to keep.
	8.2	Line 701	Editorial	Typo: EN 319 5401	EN 319 401	Accepted

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		Line 702 Line 714		Typo: EN 319 5231 Typo: duplication of "Management."	EN 319 521 delete	
	8.2	319 532	Technical	One can really question the difference between (i) the definition of conformance levels in Part 1, (ii) the conformance interoperability levels in Part 4 (quite similar description than Part 1 related text but basic and advanced conformance profiles are defined versus an undefined set of types of conformance levels) and (iii) the interoperability profiles in Part 5. This looks far too complicated or at least unclear and would deserve much clearer descriptions of what is meant exactly. And this does not even take into account the differences between qualified and non qualified REM services !!!	Clarify	Agree that "conformity levels", which was a concept introduced in REM specifications, might cause confusion with respect to "qualified/non-qualified" status. Remove " This document will also define conformance levels that implementations claiming conformance need to adhere to" from 319 532-1 A new proposal will be made for 319 532-4
	8.2		Technical	Questioning the way "qualified eDelivery services" and "qualified REM services" are addressed and (not) specified. One can find only different sets of "policy and security requirements" on TASP's issuing such qualified / non qualified services but no "technical specifications" wrt such qualified / non qualified services. This should have been addressed / should appear in the structure (in 5x2 documents).	Clarify	The distinction between qualified/non-qualified eDelivery has some impact on the technical specifications (319 522, 319 532), but it seems to be limited, so it seems reasonable that this does not impact the structure of 5x2 docs. In order to keep "qualified" features well isolated, a new part will be added: 319 522-5 Technical requirements for Qualified Electronic Delivery services (no need for a similar part in 319 532, since REM is a special case of eDelivery – put a note)
	8.2	EN 319 522-1 Lines 724 & 726	Editorial / Technical	Title announced in Line 724 (Framework, Architecture and Evidence) is not the one given in Line 726	Clarify	Accepted- change line 724 (delete "and Evidence")
	8.2	EN 319 522-x (x=2, 3, 4) and other documents when applicable	Editorial / Technical	Refrain from creating multi-part document from multi-part documents (e.g. EN 319 522-2-1, EN 319 522-2-2 and EN 319 522-2-3)	Consider removing multi-parts from multi-part documents and replace by one document addressing multiple aspects (i.e. those topics that are presented as subparts of parts).	Accepted

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	8.2	Line 790	Editorial	“Part 4: Conformance Profiles”	Go to next line and replace by “EN 319 532-4: Conformance profiles” ... when necessary (see above comment).	Accepted
	8.2	Line 785	Technical	“If needed” ... what if not needed? What will be the impact on the structure? This part will simply not exist? The other ones renumbered?	Clarify	The general approach is that, if not needed, there will be a hole in the numbering.
	8.2	All documents listed	Editorial	Update titles according to table provided below or the final table resulting from updating such table.	Update	Partially accepted: some titles need confirmation after check with SR 119 000
	8.2	Line 822 Line 833	Editorial	119 514 and 119 524 must be 119 524 and 119 534 respectively	Update	accepted
	8.2	Line 825 Line 830	Editorial	Typo: 319 532	319 522	accepted
	8.2	Titles of 119 5x4 documents	Editorial / Technical	It is not really service providers that are tested (if even they are) but actually the services they provide and this should be reflected in the titles	Tests are made at the level of the services not at the level of TASP's that can provide different types of services. Update titles accordingly See proposal in Table below.	keep alignment with ETSI SR 119 000, since this concept applies also elsewhere. If the titles in other areas are changed, then the team proposes to issue a new version of the document with the titles changed
	8.2	Lines 843 to 845 (Editorial note)	Editorial	Many typos	Correct typos.	accepted
	8.2	Line 846	Editorial	Compliance	Conformance	Accepted
	9	Whole clause	Editorial / Technical	Update from changes above	Update from changes above. Note that EN 319 413 and EN 319 423 has been abandoned.	Accepted, depends on outcome of previous decisions
	9	Title and text	Editorial / Technical	No real gap analysis is provided but more an analysis on how should the proposed documents be created and from where.	Remove word “gap” from “gap analysis”.	Accepted

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	8.2	Lines 836 to 839	Editorial / Technical	Note that if they would use exact same format and protocol they would likely be interoperable, wouldn't they? Unless the description is missing some points!!! Does this document really make sense?	Reconsider existence of such a part of further explain why it makes sense.	Keep the document. The fact that a protocol is specified does not mean that interoperability tests do not make sense. Interoperability tests have greatly helped the implementation and deployment of other specifications. Improve the description
	Annexes			They have not been reviewed.		

Trust Application Service Providers					
					Sub-areas
					Guidance
TR	1	19	5	0	0 Business Driven Guidance for Trust Application Service Providers
SR	0	19	5	3	0 Study on standardisation requirements for e-Delivery services applying e-Signatures
					Policy & Security Requirements
EN	3	19	5	1	1 Policy & Security Requirements for Data Preservation Service Providers (DPSPs)
EN	3	19	5	2	1 Policy & Security Requirements for e-Delivery Service Providers (eDSPs) - Part 1: Policy and security requirements for TASPs providing e-Delivery services - Part 2: Policy and security requirements for TASPs providing qualified e-Delivery services
EN	3	19	5	3	1 Policy & Security Requirements for Registered Electronic Mail (REM) Service Providers - Part 1: Policy and security requirements for TASPs providing REM services - Part 2: Policy and security requirements for TASPs providing qualified REM services
					Technical Specifications
EN	3	19	5	1	2 Data Preservation (through signing) Services
EN	3	19	5	2	2 E-Delivery Services - Part 1: Framework and architecture - Part 2: Semantic contents - Part 3: Formats - Part 4: Bindings
EN	3	19	5	3	2 Registered Electronic Mail (REM) Services - Part 1: Framework, architecture and conformance levels - Part 2: Semantic contents - Part 3: Formats - Part 4: Conformance profiles - Part 5: Interoperability profiles
					Conformity Assessment
EN	3	19	5	1	3 Conformity Assessment - Requirements for conformity assessment bodies assessing Data Preservation Service Providers and data preservation services they provide
EN	3	19	5	2	3 Conformity Assessment - Requirements for conformity assessment bodies assessing e-Delivery Service Providers and e-Delivery services they provide
EN	3	19	5	3	3 Conformity Assessment - Requirements for conformity assessment bodies assessing Registered Electronic Mail Service Providers and REM services they provide
					Testing Conformance & Interoperability
TS	1	19	5	0	4 General requirements for Testing Conformance & Interoperability of trust application services
TS	1	19	5	1	4 Testing Conformance & Interoperability of data preservation services
TS	1	19	5	2	4 Testing Conformance & Interoperability of e-Delivery services - Part 1: Test suites for testing interoperability of e-Delivery services - Part 2: Testing conformance
TS	1	19	5	3	4 Testing Conformance & Interoperability of Registered Electronic Mail Services - Part 1: Test suites for testing interoperability of REM services using same format and transport protocols - Part 2: Test suites for testing interoperability of REM services using different format and transport protocols - Part 3: Testing conformance