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The Finnish Transport and Communications Agency's request for comments on the revised assessment guideline for strong electronic identification services 211/2019

The National Cyber Security Centre Finland (NCSC-FI) at the Finnish Transport and Communications Agency (Traficom) requests comments on the revised **assessment guideline for strong electronic identification services (211/2019 O)**.

Integration and updating of guidelines

Guideline document 211/2019 O integrates and updates document **211/2016 O Model criteria for identification service provider audits** and the section on audit reports in document **215/2016 O Identification and trust services assessment reports** issued by the Finnish Communications Regulatory Authority (FICORA).

After the update, document 215/2019 O on assessment reports of qualified trust services will retain the section on electronic trust services based on the EU's eIDAS Regulation, the content of which has not been revised at this point.

Main changes

The Guideline provides an entirely new set of criteria for the assessment of mobile applications. A mobile application can be part of an overall implementation of an identification service. The criteria are based on the OWASP Mobile AppSec Verification specification version 1.1.3.

In the document, the general assessment criteria for identification services have been altered by reducing the number of criteria and adjusting the structure to comply with the regulatory requirements. The criteria contain references to standard ISO/EIC 27001:2013 Information security management, where applicable.

The instructions for preparing audit reports have been complemented based on experience from the application of the previous guideline.

Purpose and preparation of the Guideline

The Guideline applies to providers of strong electronic identification services, i.e. providers of identification means and identification broker services, which are registered as required by the Identification Act. The aim of the Guideline is to support the conducting and the acquisition of statutory conformity assessments and the reporting of their results in the audit report.

Traficom prepared the updated and complemented guidelines in collaboration with a working group consisting of business and administration professionals. The working group was appointed on 5 December 2018 and convened in six preparatory workshops.

Compatibility between eIDAS and PSD2 regulations

During the autumn of 2018, Traficom and the Financial Supervision Authority jointly reviewed the compatibility of requirements for strong electronic identification set in the PSD2 regulation for payment services and those set for general purpose identification in the eIDAS Regulation. They found no regulatory conflict that would prevent the same identification method from being used as a basis in both regulatory frameworks. Some details and the overall level of detail in the two frameworks vary to some extent. In the case of an identification method meeting the requirements of the more detailed or stringent regulation, it can meet the basic requirements of both regulatory frameworks.

The review was based on the regulatory requirements. The assessment criteria in Traficom's Guideline 211/2019 is based on these regulatory requirements, and therefore no new review has been performed and no deeper assessment has been conducted for mobile applications in particular. The Financial Supervision Authority has also participated in the working group's work.

Request for comments

Draft guideline document 211/2019 O is available online on the Traficom and NCSC-FI websites.

<https://www.traficom.fi/en/regulations> (search terms: *request for comments, communications, cyber security, all*)

<https://www.kyberturvallisuuskeskus.fi/en/electronic-identification> (under the title *Working documents*)

Please submit any comments in an electronic form to Traficom's registry at **kirjaamo@traficom.fi** by 16 August 2019 (**in English by 28 August 2019**). Please use the Word document format and include reference to reg. no. 1003/620/2018 in the document.

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