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3 **Identity Assurance Framework:**
4 **Service Assessment Criteria –**
5 **Profiling Rules**
6

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15 **Abstract**

16 The Kantara Initiative Identity Assurance Work Group (IAWG) was formed to foster adoption of
17 identity trust services. The primary deliverable of the IAWG is the Identity Assurance Framework
18 (IAF), which is comprised of many different documents that detail the levels of assurance and the
19 certification program that bring the Framework to the marketplace. The IAF is comprised of a set
20 of documents that includes an Overview publication, the IAF [Glossary](#), a summary [Assurance](#)
21 [Levels](#) document, and an [Assurance Assessment Scheme \(AAS\)](#), which encompasses the
22 associated assessment and certification program, as well as several subordinate documents, among
23 them the [Service Assessment Criteria \(SAC\)](#), which establishes baseline criteria for general
24 organizational conformity, identity proofing services, credential strength, and credential
25 management services against which all CSPs will be evaluated.

26 The present document defines rules to be observed by those preparing ‘Profiles’ of the Service
27 Assessment Criteria (i.e. ‘SAC Implementation Profiles’) to suit the needs of a specific community
28 and which is intended to be formally adopted by the Kantara Initiative. The document may also be
29 used as guidance by those who wish to prepare such profiles without any formal involvement with
30 Kantara.

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88 **1 INTRODUCTION**

89 The Service Assessment Criteria (SAC) part of the Kantara Initiative Identity Assurance
90 Framework (IAF) establishes baseline criteria for general organizational conformity,
91 identity proofing services, credential strength, and credential management services
92 against which all Credential Service Providers (CSP) will be evaluated.

93 Communities having specific interests may choose to establish ways of implementing
94 provisions of their services which fulfill the SAC in a particular way, e.g. by including
95 recitation of explicit policies, regulations which are complied with, etc. The practice of
96 determining and documenting these specific implementation practices is known as
97 ‘profiling’, and the resultant specification is a ‘SAC Implementation Profile’ (see §2.2,
98 ‘Definition’).

99 The present document defines rules which shall be observed by those preparing ‘Profiles’ of the
100 Service Assessment Criteria (i.e. ‘SAC Implementation Profiles’) to suit the needs of a specific
101 community and which are intended to be formally adopted by the Kantara Initiative.

102 The document may also be used as guidance by those who wish to prepare such profiles without
103 any formal involvement with Kantara, in which case all ‘shall’ forms of expression may be treated
104 as being recommended, rather than mandatory.

105 This document assumes familiarity with the requirements, terminology and concepts of the IAF.

106

107 It is desirable to have a consistent approach to how such Profiles are recorded, so as to
108 ease communication and understanding between organizations:

- 109 • wishing to adopt a profile (and they may choose to adopt more than one);
- 110 • wishing to cooperate in sharing the knowledge of how their community-specific
111 interests are reflected and in how their services are being provided; and
- 112 • studying such Profiles for other reasons.

113 This document will also benefit Kantara’s Accredited Assessors who might otherwise be
114 faced with a variety of formats and consistency of presentation of profiling data.

115 These rules fulfill these needs.

116 2 PRINCIPLES

117 2.1 Terminology

118 In accordance with established best practice in the standards development world, and in
119 keeping with usage established in key IAF documents, the following forms of expression
120 are used with the meanings given:

121 The word "**shall**" indicates requirements strictly to be followed in order to conform to
122 the specification and from which no deviation is permitted.

123 The word "**should**" indicates that among several possibilities one is recommended as
124 particularly suitable, without mentioning or excluding others, or that a certain course
125 of action is preferred but not necessarily required, or that (in the negative form) a
126 certain possibility or course of action is deprecated but not prohibited.

127 The word "**may**" indicates a course of action permissible within the limits of the
128 specification.

129 This document also uses special terms which are defined in the IAF Glossary,
130 [http://kantarainitiative.org/confluence/download/attachments/41649275/Kantara+IAF-](http://kantarainitiative.org/confluence/download/attachments/41649275/Kantara+IAF-1100-Glossary.pdf)
131 [1100-Glossary.pdf](http://kantarainitiative.org/confluence/download/attachments/41649275/Kantara+IAF-1100-Glossary.pdf)

132 2.2 Definition

133 The foregoing leads to the deduction of the following definition:

134 **SAC Implementation Profile** - a description of implementation-specific choices and
135 any supplementary requirements, expressed as being mandatory or optional, to be
136 adopted by a particular community's service providers, which strictly meets all applicable
137 SAC requirements for specified service function(s) and assurance level(s).

138
139 *Note – An SAC Implementation Profile (which, in the context of the Kantara IAF, can be*
140 *referred-to simply as a 'SIP') is intended to serve as an implementation reference for*
141 *Credential Service Providers when developing and operating their services and for*
142 *Kantara's Accredited Assessors when auditing those services for SAC conformity based*
143 *upon a specific SIP.*

144 2.3 Profile characteristics

145 Specific communities, which may be determined by service industry, regional (including
146 jurisdictional) or other scoping considerations, will frequently wish to share common
147 practices in the way in which standards and regulations, often established with a broad
148 perspective, are put into practice. Those practices are intended to make more specific the

149 requirements for implementation, but not to distort or evade the requirements of the
150 reference(s) being implemented, nor shall they be permitted to do so.

151 In the context of profiling the SAC one shall have regard to the Assurance Level(s) and
152 service component(s) (Identity Proofing and Credential Management Service Assessment
153 Criteria) which are being profiled, since (at the time of preparing the present version of
154 this document) twelve possible permutations of these two variables are possible (although
155 in practice unlikely all to occur).

156 Thus, a SAC Profile shall have the following fundamental characteristics:

- 157 a) be tailored to the specific needs of the defined community;
- 158 b) state explicitly the Assurance Level(s) and service component(s) to which it
159 applies;
- 160 c) facilitate a consistent approach towards evidencing conformity with the SAC;
- 161 d) uses terminology clearly indicating whether a provision is mandatory,
162 recommended, or simply permissible¹;
- 163 e) not define any actions or processes which reduce or lessen the requirements of
164 the SAC, which remain paramount;
- 165 f) may include comparable criteria not specifically outlined in the SAC that do not
166 reduce or lessen the requirements.
- 167

¹ i.e. adopt the forms of expression set forth in §2.1, ‘Terminology’

168 **3 PROFILING**

169 Profiling is not fundamentally difficult. It requires a good understanding of the reference
170 source (i.e. that which is being profiled) and of the subject area (i.e. the needs of the
171 community, as previously labeled). Adoption of a standardized layout (as proposed
172 herein) is simple. The art comes in succinctly defining the profile such that it is clear and
173 unambiguous and does not challenge the intention of the original reference clause(s).

174 **3.1 Documenting the Profile**

175 **3.1.1 Document management**

176 Good documentation practices require attention to certain fundamentals. The following
177 requirements shall be observed:

178 Reference: The profile document shall have a reference number for ease of cataloging.

179 Title: The profile shall be titled as “SAC Profile - *«owning community»* -
180 *«description of application»*”. Use of this style will assist cataloging,
181 particularly if the description of application makes reference to the
182 applicable Assurance Level and service component (see ‘Scope’, below).

183 Version: Each successive version shall be identifiable from its precedents, at
184 whatever level issued (e.g. public, versus formal review draft, versus
185 editorial draft). In the absence of any established practice the document
186 shall adopt the version control procedures applied by KI.

187 Scope: The profile document shall include a description of the intended scope of
188 applicability of the profile which shall, as a minimum, state all applicable
189 Assurance Levels and service components. A profile may embrace different
190 ALs for different service components, but the profile should be expressed as
191 simply as possible and creating multiple profiles, with the applicable
192 AL/component in the title should be considered. In all cases, the reference
193 version of the SAC shall be cited.

194 The above-listed items shall be included within the profile specification, the first three of
195 which shall be repeated on headers/footers throughout.

196 **3.1.2 Referencing criteria**

197 The primary objective in profiling is to identify a discrete clause within the reference
198 source and then describe how it is to be specifically implemented or observed within the
199 community to which the profile relates.

200 The SAC have been written such that each criterion has a discrete reference (ref. SAC
201 §3.3) and where there are sub-criteria, each of these is uniquely identifiable by a list
202 reference.

203 Development of a Profile therefore has the potential to address each criterion and sub-
204 criterion within the SAC. The following clauses set forth how this may be addressed.

205 **3.1.3 Means of expression & Ensuring coverage**

206 In the case where each criterion can usefully be profiled the question of completeness
207 hardly arises (reference criteria lists are available in the SAC).

208 Where a subset of the criteria are to be profiled the question arises, “How does one know
209 that the profiled criteria in the specification are actually all those intended to be
210 included?” One of the following recommendations shall be adopted:

- 211 a) Produce a community-specific version of the original SAC (since this is
212 available online as a resource document from which to work) retaining all of its
213 requirements as stated and indicate the profiling requirements as distinctly
214 identifiable text (e.g. with the community qualifier and italicized text, all
215 enclosed in square brackets);
- 216 b) Provide a table only of the criteria tags but explicitly include ALL such tags and
217 for those for which there is no determined profile, state so, or otherwise provide
218 the profile specification. By this approach less impact may be suffered if the
219 SAC is revised;
- 220 c) Provide a table of only the required profile specifications and refer to an annex
221 which lists ALL criteria in a table and simply indicates by an obvious method
222 those for which a profile has been included. This solution will require less text
223 and will not distract from what actually has been profiled. Similarly, by this
224 approach less impact may be suffered if the SAC is revised.

225 In all cases caution should be exercised to ensure that revisions to the SAC are tracked
226 and the community-specific version revised accordingly.

227 The profile specification shall adopt the terminology used in the referenced criterion, so
228 as to eliminate any potential ambiguity being introduced by the use of alternative phrases
229 or descriptors.

230

230 **3.2 Profiling examples**

231 The following examples illustrate each of the three forms of expression given above, in
232 varying circumstances. These examples adopt the forms of expression set out in §2.1.

233 **3.2.1 Example 1**

234 In this example, adopting method §3.1.3 a), the profiling simply imposes a pre-defined
235 format and set of clauses which will be chosen as the specific basis for conforming to the
236 SAC requirement, accomplished by modifying a copy of the full SAC, per §3.1.3. a).

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238
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AL1_CO_NUI#020	Service Definition inclusions
Make available a Service Definition for the specified service containing clauses that provide the following information:	
a) a Privacy Policy [PGC: <i>which shall adopt without modification the format and standard clauses from the «PrivacyGuardian Community»'s latest published Privacy Policy</i>].	

244 **3.2.2 Example 2**

245 In this example, based on method §3.1.3 b), the same profiling as above is accomplished
246 by having a separate, tabulated, profiling specification for each individual criterion.

247
248

Criterion tag	Profiled implementation
AL1_CO_NUI#010	None required
AL1_CO_NUI#020	Re. item (a): The organisation's Privacy Policy shall adopt without modification the format and standard clauses from the «PrivacyGuardian Community»'s currently published Privacy Policy.
AL1_CO_NUI#030	None required
etc.	etc.

249
250

250 **3.2.3 Example 3**

251 In this example, reflecting method §3.1.3c), the same profiling as in §3.2.1 is
 252 accomplished by having a separate, tabulated, profiling specification for only those
 253 criteria which had explicit profiling, per §3.1.3 b).

254
 255

Criterion tag	Profiled implementation
AL1_CO_NUI#020	Re. item (a): The organisation’s Privacy Policy shall adopt without modification the format and standard clauses from the «PrivacyGuardian Community»’s currently published Privacy Policy.
etc.	etc.

256
 257

258 Therefore, there is an implicit summary list elsewhere in the specification which should
 259 appear like this:

260
 261

Table 1. CO-SAC - AL1 Profiling

Clause	Profiled?
AL1_CO_ESM#010	No
AL1_CO_ESM#020	No
AL1_CO_ESM#030	Yes
AL1_CO_ESM#040	No
AL1_CO_ESM#040	No
AL1_CO_ESM#055	No
AL1_CO_NUI#010	Yes
AL1_CO_NUI#020	Yes
AL1_CO_NUI#030	Yes
AL1_CO_NUI#040	No
AL1_CO_NUI#050	Yes
AL1_CO_SCO#020	No

262

263 **3.2.4 Example 4**

264 In this example, adopting method §3.1.3 a), the profiling imposes a pre-defined format
265 and set of clauses which will fulfill all policy requirements in sub-clause a) and then
266 requires adherence to a ‘Reference Service Provision Agreement’ (which one imagines
267 the community to have created for its members’ use) and specific clauses of this
268 agreement against the eight sub-clauses e) to l) of the SAC requirement. This is
269 accomplished by modifying a copy of the full SAC, per §3.1.3. a).

270 AL2_CO_NUI#020 Service Definition inclusions

271 Make available a Service Definition for the specified service containing clauses that provide the
272 following information:

- 273 a) **Privacy, Identity Proofing & Verification, and Revocation and Termination Policies**[PGC: *which shall adopt without modification the format and standard clauses from the*
274 *«PrivacyGuardian Community»’s Service Provision Policies reference text which addresses,*
275 *inter alia, each of these topic areas*];
- 276 b) **the country in or legal jurisdiction under which the service is operated;**
- 277 c) **if different from the above, the legal jurisdiction under which subscriber and any relying**
278 **party agreements are entered into;**
- 279 d) **applicable legislation with which the service complies;**
- 280 e) **obligations incumbent upon the CSP**[PGC: *which should, as a minimum, include clauses AA*
281 *- BB of the «PrivacyGuardian Community»’s Reference Service Provision Agreement*];
- 282 f) **obligations incumbent upon the subscriber**[PGC: *which should, as a minimum, include*
283 *clauses CC - DD of the «PrivacyGuardian Community»’s Reference Service Provision*
284 *Agreement*];
- 285 g) **notifications and guidance for relying parties, especially in respect of actions they are**
286 **expected to take should they choose to rely upon the service**[PGC: *which should, as a*
287 *minimum, include clauses EE - FF of the «PrivacyGuardian Community»’s Reference Service*
288 *Provision Agreement*];
- 289 h) **statement of warranties**[PGC: *which should, as a minimum, include clauses GG - HH of the*
290 *«PrivacyGuardian Community»’s Reference Service Provision Agreement*];
- 291 i) **statement of liabilities toward both Subjects and Relying Parties**[PGC: *which should, as a*
292 *minimum, include clauses II - JJ of the «PrivacyGuardian Community»’s Reference Service*
293 *Provision Agreement*];
- 294 j) **procedures for notification of changes to terms and conditions**[PGC: *which should, as a*
295 *minimum, include clauses KK - LL of the «PrivacyGuardian Community»’s Reference Service*
296 *Provision Agreement*];
- 297 k) **steps the CSP will take in the event that it chooses or is obliged to terminate the service**
298 **which should, as a minimum, include clauses MM - NN of the «PrivacyGuardian**
299 **Community»’s Reference Service Provision Agreement;**
- 300 l) **availability of the specified service per se and of its help desk facility**[PGC: *which should, as*
301 *a minimum, include clauses OO - PP of the «PrivacyGuardian Community»’s Reference*
302 *Service Provision Agreement*].

305

305 **3.2.5 Example 5**

306 In this example, reflecting method §3.1.3c), the same profiling as above is accomplished
 307 by having a separate, tabulated, profiling specification for each individual criterion, and
 308 in this case (only) for the applicable sub-clauses, per §3.1.3. b).

309
 310

Criterion tag	Profiled implementation
AL2_CO_NUI#020	<p>Re. item (a): which shall adopt without modification the format and standard clauses from the «PrivacyGuardian Community»’s Service Provision Policies reference text which addresses, inter alia, each of these topic areas.</p> <p>Re. item (e): which should, as a minimum, include clauses AA - BB of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p> <p>Re. item (f): which should, as a minimum, include clauses CC - DD of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p> <p>Re. item (g): which should, as a minimum, include clauses EE - FF of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p> <p>Re. item (h): which should, as a minimum, include clauses GG - HH of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p> <p>Re. item (i): which should, as a minimum, include clauses II - JJ of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p> <p>Re. item (j): which should, as a minimum, include clauses KK - LL of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p> <p>Re. item (k): which should, as a minimum, include clauses MM - NN of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p> <p>Re. item (l): which should, as a minimum, include clauses OO - PP of the «PrivacyGuardian Community»’s Reference Service Provision Agreement.</p>
etc.	etc.

311

312 3.2.6 Example 6

313 All of the examples so far have taken a clause and made it more explicit. The following
314 example, adopting method §3.1.3 a), takes a slightly different path, in an assumed
315 ‘Health Insurance Community’. The SAC requirement permits a degree of choice as to
316 how the clause is fulfilled, but the profile removes that element of choice and imposes a
317 specific form of conformity and, moreover, specifies particular controls which should be
318 taken into consideration when establishing and operating the ISMS. The dictated solution
319 therefore fulfills the SAC requirement by meeting, explicitly, one of the available
320 options.

321

322 AL3_CO_ISM#120 Best Practice Security Management

323 **Have in place an Information Security Management System (ISMS), or other IT security**
324 **management methodology recognized by a government or professional body, that follows best**
325 **practices as accepted by the information security industry and that applies and is appropriate to**
326 **the CSP in question. All requirements expressed in preceding criteria in this section must *inter alia***
327 **fall wholly within the scope of this ISMS or selected recognized alternative.**

328 [*HIC: Shall have in place an ISMS currently certified as being conformant to ISMS 27001, per the latest*
329 *ISO-published version at the time of last certification, which includes an SoA addressing all controls*
330 *listed in IS27001 Annex A, which has taken into consideration the guidance given in ISO/IEC 27799*
331 *(version requirements as per certification) and incorporates the controls listed in Extended Control Sets*
332 *HIC-ESC-27001/HIPAA and HIC-ESC-27001/PIPEDA.]*

333

334 3.2.7 Example 7

335 In this final example, which could apply to any of the methods described in §3.1.3c), are
336 instances of acceptable and unacceptable profile clauses.

337 Consider the CM_SAC clause AL3_CM_RVP#060 Record Retention, which states:

338

339 *Retain, securely, the record of the revocation process for a period which is in*
340 *compliance with:*

341 *a) the records retention policy required by AL2_CM_CPP#010, and;*

342 *b) applicable legislation;*

343 *and which, in addition, must be not less than the duration of the subscriber’s account*
344 *plus 7.5 years.*

345

346 A profile addressing this clause might state:

347 *AL3_CM_RVP#060: Community members shall retain revocation records for a*
348 *minimum period of 10 years after the closure of a subscriber's account.*

349 This would be an acceptable profiling clause because the retention period exceeds that of
350 the SAC's requirement.

351 On the other hand, were the profile to state:

352 *AL3_CM_RVP#060: Community members shall dispose of revocation records 5*
353 *years after the closure of a subscriber's account.*

354 this would not be permitted because the stated retention period, being shorter than that
355 required by the SAC, would render any implementer adopting that retention period to be
356 non-compliant with this SAC criterion.

357

358

359 Users will readily see, without further examples, how the SAC requirements can be made
360 more concrete and relevant in specific instances and can map the generic requirements
361 onto much more specific needs, suiting particular communities of interest. Other
362 instances might list specific controls to be from other sources in response to specific SAC
363 requirements (e.g. citing NIST SP 800-53 controls).

364

365

366

367 **4 Process for Profile Approval**

368 **4.1 Submit Proposal**

369 Any group that is seeking to create a profile of the Service Assessment Criteria
370 should complete and submit the SAC Profile Submission Form. This form
371 includes information such as the specific community of interest or jurisdiction that
372 is requesting the profile and a brief description of why the profile is required.
373 This form, will provide the IAWG the opportunity to review the request, and
374 assign a liaison to the Profile Creation Work Group that is specifically associated
375 with the particular subject matter of the profile.

376

377 **4.2 IAWAG Liaison**

378 Based on the information submitted on the proposal form, the IAWG will poll the
379 membership and determine the most appropriate liaison assigned to the work
380 effort associated with the profile. The IAWG liaison will also serve as the
381 Identity Assurance SME and resource for the PCWG. The liaison will also serve
382 as a communication vehicle between the IAWG and the Profile Creation Work
383 Group (PCWG). As a result the liaison will report back to the IAWG on the
384 PCWGs work efforts on at least a monthly basis or some time frame more
385 appropriately associated with the time frame established by the PCWG for the
386 completion of the profile. The report given by the liaison should focus on the
387 status of the completion of the profile and also any potential issues that have
388 arisen within the PCWG that could require additional work by the IAWG. This
389 ongoing communication is necessary to ensure that at the point of final
390 submission of the profile to the IAWG for inclusion in the IAF stack of
391 documents, there are no surprises.

392 **4.3 Conflicts**

393 Any conflicts identified between the SAC and the profile created by the PCWG,
394 should attempt to be resolved between the two groups. However, there will
395 potentially be instances in which potential conflicts could pose an issue regarding
396 Kantara interoperability with other Trust Frameworks. In these instances
397 escalation to either Kantara Leadership or external partners would be required.
398 required. In these circumstances conflicts should be noted and tracked through
399 resolution.

400 **4.4 IAWG Approval**

401 Upon final submission to the IAWG and resolution of all issues, the IAWG will
402 take a vote on the proposed profile. The approval of the profile by the IAWG will
403 officially adopt the profile as a component to the stack of IAF documents.

404 **5 ASSESSMENTS**

405 Little guidance is required, but the following points are made as much for the benefit of
406 CSPs seeking an assessment of their services as to aid Assessors in their task.

407 **5.1 SAC Supremacy**

408 Nothing in a profile shall avoid conformity to any criteria within the IAF unless there is a
409 clear stand-alone argument that a criterion does not apply. Profiling is not a means to
410 develop an alternative to, or to void, a criterion; it is intended to provide a means by
411 which to conform in a consistent manner, typically by describing a more explicit level of
412 requirement and/or means to achieve conformity.

413 **5.2 Ease of use**

414 Adoption of a consistent format (i.e. that put forth in this specification) will make easier
415 the job of almost all parties involved in the provision, use, inter-operation and assessment
416 of identity services.