

Annex 1: Consultation Questions - Joint EUA and BEAMA Responses:

General point about Certificate Maintenance:

There seems to be a mismatch between what it says about Certificate Maintenance in SEC3, and what is contained in the CESG documentation about CPA.

SEC3 says:

F2.8 (page 148) A CPA Certificate for a Device Model may allow one or more additional firmware versions and/or hardware versions for that Device Model to be added to that CPA Certificate, subject to the terms of that CPA Certificate.

Whereas CESG say that a CPA Certificate only covers a Product Version, but does include an Assurance Maintenance Plan (AMP):

CESG's 'Process for Performing Foundation Grade Evaluations v1.3':

V.B. 104-107: The AMP defines those changes to the product that will not be covered by automatic certification during the lifetime of the CPA certificate, and thus will require some form of re-evaluation. The Assurance Maintenance Plan will also be made available to UK Government customers of the product.

The Evaluation Team must carefully consider which aspects of the product are security critical. The team must then decide on a level of change to these areas that they believe should require reassessment by a CPA Evaluation Facility. Should the product developer subsequently make a qualifying change, it would need to engage such a facility for an assurance maintenance activity, or risk losing their product's CPA certificate.

Minor updates, trivial bug fixes, performance improvements, quality improvements (i.e. small scale, localized changes) should not require nor warrant evaluation via Assurance Maintenance. Only those modifications that represent significant change to the product's implementation or mode of working should be incorporated.

So on one hand we have SEC3 with the CPA Certificate having firmware versions, whilst on the other hand we have CESG with a CPA for a specific Product, with an AMP that defines the scope of what firmware changes can be made whilst maintaining the cover of the CPA Certificate, and a Certified Products List (CPL) that defines the firmware and hardware versions that are part of that Product.

These are very different interpretations, and my understanding is that SEC3 is the legal document that will apply.

As explained in the answer below, the SSWG position is that:

We, as meter manufacturers, agree with this described CPA process for re-certification and the decision of whether a product needs to undertake certification should be part of the Assurance Maintenance Plan activity. Re-certification in case of an updated Security Characteristic should not be required prior to next periodic assurance renewal.

The SEC3 draft (section F2) also appears to be out of sync with this, requiring all firmware versions to be listed on the CPA certificate – where the CPA certificate only covers the Product version.

4: Supplier Nominated Agents

Q18 Do you think that it is important that MOPs / MAMs are able to access DCC services directly? Please provide a rationale for your views.

Yes it is essential for MOPs, MAMs and possibly in certain circumstances MAPs to have access directly to DCC. This has always been the position put forward by all trade

bodies representing these industry sectors. Any other option will restrict these organisations from carrying out their normal business activities.

Q19 Do you have any views on the possible options identified for MOPs / MAMs to access DCC services? Please provide a rationale for your views.

Option 2 ideally but possibly option 3 would be acceptable for MAMs and MOPs but the suppliers should not be able to restrict the normal business activities of any MAM or MOP

Q20 Are there other options which should be considered for MOPs/MAMs to access DCC services?

We believe that there are times when MAPs would also need access to asset management and tracking information which should be available via DCC without restriction by suppliers.

6.1: Smart Metering System Requirements

Q26 Do you agree with our proposed text for the SEC with respect to Equipment Testing, and configuration of enrolled Smart Metering Systems? Please provide a rationale for your views.

F2.8: We do not agree with the proposed text with respect to this section. It is our understanding that the CPA certification relates to an initial Product version that can be updated as per the agreed AMP and as such multiple HW and FW versions are covered but not explicitly recorded on the CPA certificate. A fundamental principal of CPA is providing not only assurance to the product at a point of certification but also assurances to the development of that product such changes can be made without the need for recertification. The current draft SEC3 wording would force manufacturers to seek approval for every updated HW or SW version, which goes against the CPA scheme along with adding costs and time delays to providing product updates.

F5 / H4.5: The manufacturer has no relationship with the DCC, it is not a defined DCC user and as such it is not feasible for the 'User' to "(d) arrange for the Manufacturer to provide the DCC...". It is our understanding that this information is already provided by the user when adding the FW to the CPL