STI-CAs must follow the Certificate Policy (CP) issue by the STI-GA/STI-PA. The CP may reference ATIS standards, but ultimately, the CP is what STI-CAs must follow, not necessarily the ATIS standards. The CP and ATIS standards may not always align. For example, the CP may not have been updated yet to match a recent change to an ATIS standard. Therefore, this contribution is discussing the CP, not the ATIS standards.

If changes to the CP are applicable to all certificates (both old and new), then a change could require that every STI certificate in the country be reissued. For example, if a change is made that requires an STI certificate to include a new extension.

In the web world, changes to certificate profiles are only applicable to root, intermediate, and/or end-entity certificates issued after a specified effective date (which is always after the certificate profile change was made and normally provides a window of time for CAs to implement the required changes).

**Changes to the certificate profile section of the CP (which defines requirements for DN format, extensions, etc. of root, intermediate, and/or end-entity certificates) should only be applicable to certificates issued after the change was made (i.e., certificates with a Not Before date that is after the CP change was published).** For example, if a change is made that requires an STI certificate to include a new extension then all existing certificates without the extension could continue to be used until they expire, but new certificates issued (including renewals of existing certificates) would be required to include the extension. The STI-CA and/or service providers may choose to reissue existing certificates before their expiration if the new extension provides some desired functionality, but they should not be required to by the CP.

This contribution is being submitted to ATIS in order to facilitate a technical conversation about the impacts of certificate profile changes. This contribution is not proposing any changes or additions to ATIS standards.

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