

Editor's Note: PCTF Model Comments

This document provides summary results of the open review of the Pan-Canadian Trust Framework Model Discussion Draft. DIACC conducted this review from 14 February to 15 March 15, 2019.

Approximately 500 comments were submitted during the review period. The editing team reviewed each comment. As a result, the Trust Framework Model is arguably an improved, if not yet perfect, document.

Comments generally fall into two categories:

1. Those the editing team regards as directly related to the contents of the PCTF Model Discussion Draft given its stated purpose of providing a high-level model overview of the PCTF – This category includes broad general comments (e.g., how digital identity is becoming a human rights issue throughout the world), comments regarding specific text in the body of the document, and editorial notes (e.g., duplicate words in the text). These comments are directly related to changes made in the revised version of document. The editing team made every effort to accept¹ as many of these comments as possible.
2. Those identifying areas lacking in detail, requesting additional details, or otherwise concerned with the particulars of various topics, trusted processes, and conformance criteria – This category includes comments where reviewers provide or suggest technical details (e.g., the standards the PCTF should use) and those highlighting the requirements of certain communities of interest or jurisdictions. Given the high-level scope of the PCTF Model, the editing team acknowledged the points made by these comments but deferred most of them in favour of discussion and inclusion in documents TFEC intends to address technical and operational specifics (e.g., components like Verified Login or Verified Person).

Given the number and level of subject matter expertise of comments in the second category, the editors believe the review of the Model Overview has been valuable not only in improving that document, but also in providing input relevant to how TFEC moves forward and develops other PCTF components. The editing team will explore options for communicating the feedback to TFEC so it can inform efforts moving forward.

Major and Recurrent Themes

The editing team noted the following as significant themes running throughout the comments received:

1. Governance – Many reviewers consider the absence of a full governance section as a significant gap in the existing Model Overview. Concerns range from how compliance the PCTF conformance criteria would be assessed to how updates and revisions to the PCTF will be managed. These are known issues still being resolved with work underway. The Model Overview will be updated as this work is completed.
2. Scope – In addition to expanded scope in terms of level of detail, reviewers commented on how forward-looking the document should be versus dealing with the current state of affairs. The notion of machines as digital ID subjects, for example, is introduced in the Model, with commenters wondering if this was appropriate at the moment. Similarly, to what extent the document deals with existing analogue processes (recognizing they will continue to exist for some time) was a matter of discussion. The revised version retains forward-looking content but notes that these are not necessarily priority action areas for TFEC.

¹ "Accepted" and "Deferred" are indicators in the disposition of comments spreadsheet used to manage responses to comments.

3. Authenticators – The current document uses “authenticators” when referring to data provides access to restricted or protected systems (e.g., username/password combinations). Commenters were divided on whether such things should be part of the PCTF (with several suggesting they should no longer be used at all) and by what term they should be referred (with “credential” being the most common term cited). The revised version continues to use concept and term “authenticator” while “credential” refers to digital representations of a subject’s attributes.
4. Foundational vs. other types of identities – The Model distinguishes foundational (i.e., those issued by mandated public agencies) from other types of identities. Commenters wondered if the distinction is necessary or if the existing document exhibited a bias toward foundational identities. Given significant differences between the types, the revised document retains the different types of identities.
5. Terminology – Many comments suggested changes to definitions or requested creation of a glossary. A glossary is currently under development.

Key Revisions

The editing team made the following major revisions based on comments received:

1. Introduce “digital representations” – The concepts of “digital identity” and “identity information” were not well suited to describing the scope of the PCTF. The concept of “digital representation” was introduced by the IMSC and is included in the revised version.
2. Change trusted process definitions – The descriptions of the trusted processes in the overview have been updated. The revised content borrows from and more closely aligns with work from the IMSC.
3. Introduce PCTF profiles – A “PCTF profile” is a document specific communities of interest (however said community is defined) can use to address specific requirements and circumstances. The PCTF components will set a baseline but we should acknowledge the fact that it would be impossible to meet every certain circumstance.
4. Removed “Auxiliary ID” – Widely cited as unnecessary. These have been folded into contextual ID's.