

6th August 2020

From: Open Banking Europe QTSPs

Open Letter on Certificate Validation

Sirs,

We understand that a number of valid QTSP certificates are being rejected by ASPSPs, which seems to contradict eIDAS principles.

We the undersigned urge all entities rejecting these certificates to apply the EU requirements for the validation of EU Qualified Certificates in eIDAS Commission Implementing Decision (EU) 2015/1505. Specifically, we refer to the requirement to use a "service digital identifier" (i.e. CA certificate) in an EU Trusted List as the trust anchor for validation, such as specified in RFC 5280.

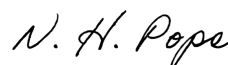
Thus, if a qualified certificate can be validated against a CA certificate in the EU Trusted List and the relying party subsequently rejects this certificate because it cannot be separately validated against a root CA certificate outside the trusted list. This is counter to the requirements of eIDAS Regulation (EU) No 910/2014. In short, additional validation against a root CA certificate that is not in the EU Trusted List is unnecessary and even non-compliant.

We would also like to point out that the undersigned QTSPs do not require relying parties to validate qualified certificates for PSD2 to root certificates which are not listed in the EU Trusted Lists.

We trust that entities that have previously proceeded this way will give this matter the proper consideration.

Yours sincerely,



John Broxis, Managing Director of PRETA-OBE

Nick Pope, Consultant for PRETA-OBE

OBE QTSP Members

| QTSP | Country |
|------------------------------------|-------------------------|
| ADACOM | Greece |
| Actalis / Aruba PEC S.p.A | Italy |
| Bypass AS | Norway |
| CERTSIGN | Romania |
| D-TRUST GmbH | Germany |
| Entrust Datacard Europe | Spain |
| Fina | Austria, Belgium, Spain |
| GlobalSign | Belgium |
| Harica | Greece |
| InfoCert S.p.A. | Italy |
| Microsec | Hungary |
| MULTICERT | Portugal |
| První certifikační autorita (ICA) | Czech Republic |
| Digicert + QuoVadis Trustlink B.V. | Netherlands, Belgium |