



CAMSS ASSESSMENT SUMMARY v1.0.0

ETSI EN 319 532-3 (ESI REM)

European Telecommunications Standards Institute (ETSI)¹

¹ ETSI EN 319 532-3 specification:

https://www.etsi.org/deliver/etsi_en/319500_319599/31953203/01.02.01_60/en_31953203v010201p.pdf

Change Control

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1. INTRODUCTION

The present document is a summary of the assessment of the **ESI_REM** carried out by CAMSS using the CAMSS Assessment EIF scenario². The purpose of this scenario is to assess the compliance of a standard or specification with the European Interoperability Framework (EIF)³.

2. Assessment Summary

The **Registered Electronic Mail (REM)** is a particular instance of an "Electronic Registered Delivery Service" (ERDS). Standard email, used as backbone, makes interoperability smooth and increases usability. At the same time, the application of additional security mechanisms ensures integrity, confidentiality and non-repudiation (of submission, consignment, handover, etc.), and protects against risk of loss, theft, damage and any illegitimate modification.

The specification updates the interoperability profiles of REM messages. This part (3) of ESI_REM defines the technical standards that meet the functional requirements for a common electronic delivery service in the framework of the eIDAS Regulation.

2.1. EIF Interoperability Principles

Interoperability principles are fundamental behavioural aspects that drive interoperability actions. They are relevant to the process of establishing interoperable European public services. They describe the context in which European public services are designed and implemented.

The specification does not support the principles setting context for EU actions on interoperability:

- Subsidiarity and proportionality

According to the National Interoperability Framework Observatory (NIFO)⁴ factsheets, ESI_REM is not included within the national catalogue of any Member States.

The specification partially supports the principles setting context for EU actions on interoperability:

- Openness

ESI_REM is not related to the publication of public data as open data. The development process has been developed by ETSI so all stakeholders can formally appeal and/or raise objections to the development and approval of specifications but it requires feed and membership approval.

² EIF Scenario: <u>https://ec.europa.eu/eusurvey/runner/EIFScenario_v510</u>

³ EIF: <u>https://ec.europa.eu/isa2/eif_en</u>

⁴ NIFO factsheets: <u>https://joinup.ec.europa.eu/collection/national-interoperability-framework-observatory-nifo/nifo-factsheets</u>

The ETSI and any of its committees, in charge of the development of ETSI EN 319 532-3, operate under the ETSI Intellectual Property Rights (IPRs) and IPR Policy. The specification is licensed on a royalty-free basis.

The specification is mature enough to consider its use in the development of digital solutions/services as it is documented use in an Italian government website mentioning the use of ETSI EN 319 532-3 in their Certified Email (PEC), providing technical rules that envisage eIDAS Regulation.

- Transparency

Unfortunately, the purpose of ETSI EN 319 532-3 is not related to the visibility of administration procedures nor comprehensibility of administrative procedures, rules data and services, therefore the specification does not promote or hinder it.

It enables the exposure of interfaces combined with other specifications, as REM is a particular instance of Electronic Registered Delivery Service (ERDS) and makes interoperability smooth and increases usability, at the same time, the application of additional security mechanisms ensures integrity, confidentiality, non-repudiation and protects against the risk of loss, theft, damage of any other illegitimate modification, which enhances the trustworthy exposure of interfaces.

- Reusability

ETSI EN 319 532-3 is a business domain agnostic specification and therefore can be used and implemented in any domain.

- Technological neutrality and data portability

ETSI EN 319 532-3 does depend on other specifications, such as S/MIME (RFC 3851). Still is to ensure a consistent form of service across Europe, especially concerning the form of evidence provided, to maximize interoperability even between e.mail domains governed by different policy rules.

- User-centricity

There is no reference to ETSI EN 319 532-3 and a European use case explicitly stating that the specification allows relevant information and data to be reused.

- Inclusion and accessibility

The purpose of ETSI EN 319 532-3 is not related to e-accessibility. Therefore, this criterion is considered not applicable to this specification.

- Security and privacy

REM provides an e-mail service and security controls and mechanisms to protect transactions. Also, REM Signature enables the secure exchange of data between both parts, therefore it promotes secure processing of data.

- Multilingualism

The specification does treat translation, as it is done to the tags in the optional message content such as "Entity Name" or "Postal Address", although information in free text shall be written in UK English

The specification partially supports the foundation principles for cooperation among public administrations:

- Administrative Simplification

REM is a type of electronic registered delivery, which increases usability and ensures integrity, so ultimately it simplifies the delivery of European public services and enables digital service delivery channels.

Preservation of information

The purpose of ETSI EN 319 532-3 is not related to the long-term preservation of electronic records. Therefore, this criterion is considered not applicable to this specification.

- Assessment of effectiveness and efficiency

There are assessments that indirectly address the specification, as EN 319 532 substituted the previous TS 102 640, which indicated EN 319 532 as an effective service. Also, ENISA⁵ is recommending the specification in a Signature Verification Document.

2.2. EIF Interoperability Layers

The interoperability model which is applicable to all digital public services includes:

- Four layers of interoperability: legal, organisational, semantic and technical;
- A cross-cutting component of the four layers, 'integrated public service governance';
- A background layer, 'interoperability governance'.

The Specification supports the implementation of digital public services complying with the EIF interoperability model:

- Interoperability governance

ETSI EN 319 532-3 is already associated with an EIRA ABB in the EIRA Library Of Specifications (ELIS⁶). More specifically, ESI_REM can define the interoperability aspects of the "Registered Electronic Delivery ABB of the EIRA Library of Interoperability Specifications

- Legal Interoperability

⁵ENISA Document reference:https://www.enisa.europa.eu/events/tsforum-caday-2018/presentations/C03_Rock.pdf

⁶ELIS : https://joinup.ec.europa.eu/collection/common-assessment-method-standards-and-specificationscamss/solution/elis/release/v110

The rules on European standardisation allow the European Commission to identify information and communication technology (ICT⁷) technical specifications - that are not national, European or international standards - to be eligible for referencing in public procurement. After being evaluated as compliant with the regulation on standardisation 1025/2012, ETSI EN 319 532-3 is identified as a European Standard, delivered by a European Standardisation organisation (ETSI). The positive evaluation of ETSI EN 319 532-3 and its identification in European Regulations respond positively to this criterion.

- Organisational Interoperability

The purpose of ETSI EN 319 532-3 is not related to the facilitation of modelling business processes, therefore it does not promote or hinder it. Although, the specification defines most elements to facilitate organisational interoperability agreements, as it ensures a consistent form of service across Europe, especially regarding the form of evidence provided, to maximize interoperability even between e-mail domains governed by different policy rules.

- Semantic Interoperability

The specification has the support of many communities including Universities, and private and public companies. However, there are not any community sharing data and results on national platforms.

⁷ICT Technical Specifications: https://ec.europa.eu/growth/single-market/european-standards/ictstandardisation/ict-technical-specifications_en

3. Assessment Results

This section presents an overview of the results of the CAMSS assessments for **ETSI EN 319 532-3**. The CAMSS "Strength" indicator measures the reliability of the assessment by calculating the number of answered (applicable) criteria. On the other hand, the number of favourable answers and the number of unfavourable ones is used to calculate the "Automated Score" per category and an "Overall Score".

Category	Automated Score	Assessment Strength	Compliance Level
EIF Principle setting the context for EU actions on interoperability	20/100 (20%)	100%	Ad-hoc
Core interoperability principles	1520/2100 (72%)	95%	Sustainable
Principles related to generic user needs and expectations	360/500 (72%)	80%	Sustainable
Foundation principles for cooperation among public administrations	320/500 (64%)	100%	Sustainable
Interoperability layers*	920/1100 (83%)	91%	Seamless
Overall Score	2860/4000 (72%) ⁸	93%	

*The technical interoperability layer is covered by the criteria corresponding to the core interoperability principle "Openness".

With a 93% of assessment strength, this assessment can be considered representative of the specification compliance with the EIF principles and recommendations.

The Overall Automated Score of 72% (2860/4000) demonstrates that the specification does not support the European Interoperability Framework in the domains where it applies.

⁸ See the "results interpretation" section of the CAMSS Assessment EIF Scenario Quick User Guide:

https://joinup.ec.europa.eu/collection/common-assessment-method-standards-and-specificationscamss/solution/camss-assessment-eif-scenario/results-visualisation-and-interpretation