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1 Introduction

1.1 Overview

This document describes the common set of compliance requirements by which Remote SIM Provisioning (eSIM) products can demonstrate and declare compliance with the GSMA Consumer eSIM Architecture and Technical PRDs; SGP.21 [1] and SGP.22 [2].

Specific requirements to declare compliance are described according to the eSIM product or service, and include the following:

- Functional compliance to GSMA's Consumer eSIM PRDs,
- Product security; both platform (hardware) and specific eUICC security requirements,
- eUICC production site security, referencing GSMA's SAS-UP audit scheme
- Subscription Management server site security, referencing GSMA's SAS-SM audit scheme

eSIM compliance is an eligibility pre-requisite for the issuance of the X.509 PKI certificates used in Consumer eSIM authentication to eUICC manufacturers and subscription management service providers.

This version of SGP.24, including its associated annexes, supersedes previous versions, as detailed in Annex C.

1.2 Scope

The requirements within this document are applicable to the following Products:

- 1. Devices supporting an LPA in the device (LPAd) or LPA in the eUICC (LPAe)
- 2. eUICC, with or without an LPA
- 3. SM-DP+ and SM-DS providing a Subscription Management service

1.3 Intended Audience

Consumer eSIM product vendors, telecom service providers, test and certification bodies, and other industry organisations working in the area of eSIM.

Term	Description		
	As defined in RFC.5280 [9] or GlobalPlatform specifications		
	Identifies its issuing certification authority		
Digital Certificate (Public	Names or identifies the subscriber of the certificate		
Кеу)	Contains the subscriber's public key		
	Identifies its operational period		
	Is digitally signed by the issuing certification authority.		
Evidence Documentation	Evidence of product compliance to the requirements detailed within this document.		
eSIM Product	eUICC, SM-DP+ (Subscription Manager Data Preparation), SM-DS (Subscription Manager Discovery Services) and Devices that are designed to support the GSMA defined Remote SIM Provisioning feature.		

1.4 Definition of Terms

Term	Description
eSIM Product Vendor	The manufacturer or service provider of an eSIM Product
Type Allocation Code	Initial eight-digit portion of the 15-digit IMEI used in 3GPP mobile devices

1.5 Abbreviations

Abbreviation	Description		
EID	eUICC identifier		
eUICC	Embedded UICC		
eSA	eUICC Security Assurance		
eSIM	General term used to describe GSMA remote SIM provisioning		
EUM	eUICC manufacturer		
IMEI	International Mobile Equipment Identity		
LPA	Local Profile Assistant		
PRD	Permanent Reference Document		
eSIM Remote SIM Provisioning			
SAS	GSMA Security Accreditation Scheme		
SAS-SM	SAS for Subscription Management		
SAS-UP	SAS for UICC Production		
SM-DP+	Subscription Manager Data Preparation +		
SM-DS Subscription Manager (Root or Alternative) Discovery Servi			
TAC	Type Allocation Code		

1.6 References

Refer to the eSIM Certification Applicability table in Annex C of this document to identify the valid versions(s)

Ref	Document Number	Title
[1]	GSMA PRD SGP.21	eSIM Architecture Specification
[2]	GSMA PRD SGP.22	eSIM Technical Specification
[3]	GSMA PRD SGP.23	eSIM Test Specification
[4]	GSMA PRD SGP.25	eUICC for Consumer Devices Protection Profile
[5]	GSMA PRD FS.04	Security Accreditation Scheme for UICC Production – Standard
[6]	GSMA PRD FS.08	GSMA SAS Standard for Subscription Manager Roles
[7]	GSMA PRD SGP.14	GSMA eUICC PKI Certificate Policy
[8]	RFC 2119	"Key words for use in RFCs to Indicate Requirement Levels", S. Bradner http://www.ietf.org/rfc/rfc2119.txt
[9]	RFC 5280 Internet X.509 PKI Certificate and CRL Profile	
[10]	GSMA PRD SGP.06	eUICC Security Assurance Principles
[11]	GSMA PRD SGP.07	eUICC Security Assurance Methodology

Ref	Document Number	Title
[12]	SGP.24 V2.2 eSIM Application Note	Application Note: SM-DP+ behaviour on version interoperability and extensibility
[13]	GSMA PRD AA.35	Procedures for Industry Specifications Product

1.7 Conventions

The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in RFC2119 [8].

2 Compliance Overview

The GSMA Consumer eSIM architecture PRD, SGP.21 [1], specifies the high level security and functional requirements for eSIM Product compliance. The eSIM Technical Specification, SGP.22 [2], provides the technical description of the eSIM architecture, and is the technical reference for test and compliance requirements.

Compliance is essential for interoperability within the Consumer eSIM network. This document provides the framework within which:

- eUICC, SM-DP+ and SM-DS requiring eSIM PKI certificates for eSIM operation can demonstrate the prerequisite functional and security compliance to the Consumer eSIM requirements.
- An eSIM Device can demonstrate functional compliance to the Consumer eSIM requirements.

The expected means to demonstrate compliance are detailed in this document, together with the declaration templates to be used for an SGP.24 declaration.

Specific references for all compliance requirements can be found in Annex C, categorised as either "Site Security Requirements", "Product Security Requirements" or "Functional Requirements".

It is recommended to refer to Annex C when planning a product or service compliance in order to identify the validity and applicability of referenced specifications and requirements.

3 Compliance Declarations

To declare compliance with SGP.24, the product shall:

- Be compliant with the technical requirements defined in the GSMA PRD SGP.21 [1] and GSMA PRD SGP.22 [2].
- Have demonstrated its compliance using the means described in SGP.24, and its Annex C.

The compliance declaration templates are in Annex A of this document, and shall be submitted to <u>RSPCompliance@gsma.com</u> for verification once all compliance requirements have been met. The Compliance declaration comprises:

- Completed template Annex A.1: the Product Declaration, which also provides details of the organisation responsible for the declaration,
- Completed template Annex A.2 or A.3 or A.4 or A.5 (as applicable): the compliance details of the declared eSIM Product or service.

The GSMA turnaround time for issuing a confirmation of compliance declaration is 2 working days.

Product type	Product Declaration	Details of Security Compliance	Details of Functional Compliance
Device	Annex A.1	n/a	Annex A.2
eUICC	Annex A.1	Annex A.3	Annex A.3
SM-DP+	Annex A.1	Annex A.4	Annex A.4
Alt SM-DS	Annex A.1	Annex A.5	Annex A.5

Table 1: Compliance declaration templates

3.1 Compliance Maintenance

A compliance declaration is an indication of:

- the initial compliance of the product, at the time of declaration,
- the ongoing compliance of the product, including any hardware or software updates affecting eSIM features.

A new declaration (i.e. latest SGP.24 template) is to be submitted for any changes to eSIM product e.g. change in eSIM features.

An updated declaration (i.e. update of the initial SGP.24 declaration made for the product) is required for SAS related production changes – e.g. the addition of a new SAS site for the production of the product.

In either case, the declaration will be verified to check the product has demonstrated compliance using the applicable version of SGP.24 (i.e. the initial or latest version) according to the reason for compliance maintenance.

It is to be noted that an updated declaration containing the additional test in SGP.24 V2.2 eSIM Application Note [12] will be annotated as such within the InfoCentre database for eSIM compliance products.

Changes to a compliant product that result in it no longer being compliant to the initially declared specifications shall be notified to the GSMA with a request for compliance to be withdrawn. As a consequence, GSMA will remove the declaration from its InfoCentre data

4 Compliance Requirements

The compliance requirements are derived from the GSMA SGP.21 [1] eSIM Architecture specification. This section details these requirements and their applicability to eSIM product as:

- Site security requirements for eUICC production sites and Subscription Management service sites,
- Product security requirements (eUICC only),
- Functional requirements, including interoperability.

4.1 Site Security Requirements

All eUICC production sites and all SM-DP+ and SM-DS service sites used in GSMA eSIM must hold a valid site security accreditation for the entire time they are being used for eUICC production or Subscription Management service provision.

Accreditation is from the GSMA Security Accreditation Scheme (SAS). Further details can be found on the GSMA's <u>SAS</u> webpage.

The SAS-UP or SAS-SM certificate reference shall be included in the compliance declaration for an eUICC (annex A.3), SM-DP+ (annex A.4) or SM-DS (annex A.5).

Product type		Compliance		
	Scheme	Required Scope	requirement	
eUICC SAS-UP		 Management of PKI certificates Generation of data for personalisation Personalisation 	Provisional or Full certification	
SM-DP+	SAS-SM	Data centre operations & managementData Preparation +	Provisional or Full certification	
SM-DS	SAS-SM	Data centre operations & managementDiscovery Service	Provisional or Full certification	

Table 2: Operational Security Compliance requirements per product type

4.1.1 Specific Considerations for eUICC

All SAS-UP scope requirements must be fulfilled; either at the same production site or at multiple production sites, according to the SAS accredited production arrangements for the eUICC.

- Details of all manufacturing sites used in the production of the eUICC shall be provided in its Annex A.3 declaration, clearly identifying the SAS scope for each site,
- All three SAS scope requirements shall be covered by the eUICC production site(s),
- The organisation and site intending to apply for the Digital (PKI) Certificate from the GSMA Root CI shall:
 - be named on the Annex A.1 declaration for the eUICC
 - have Management of PKI Certificates within its SAS-UP accreditation scope

4.2 **Product Security Requirements (eUICCs only)**

A protection profile has been developed for eUICC software implementing the GSMA eSIM architecture for Consumer Devices. The protection profile is published as GSMA PRD SGP.25 [4], and registered as a Protection Profile by BSI, reference BSI-CC-PP-0100.

eUICC security evaluations are expected to include:

- the complete Target of Evaluation defined in SGP.25 [4]
- the secure IC platform and OS
- the runtime environment (for example Java card system)

The IC/hardware platform on which the eUICC is based shall be certified to either PP-0084 or PP-0035

The Common Criteria certificates or certificate references

(<u>www.commoncriteriaportal.org/products</u>) shall be included in the declaration as evidence of product security compliance.

Product type	Product Security Requirement	Compliance requirement
	Security IC Platform Protection Profile with Augmentation Package Certification (PP-0084) <u>or</u> Security IC Platform Protection Profile, Version 1.0 (PP- 0035)	Common Criteria certified and listed, or scan of certificate attached.
eUICC	Security evaluation reflecting the security objectives defined in SGP.25 [4], with resistance against high level attack potential. See Annex A.3 for permitted methodologies. Testing to be performed at a SOG-IS lab, accredited in the Smartcards & similar devices technical domain.	Refer to Annex A.3, section A.3.4.2

Table 3: Product Security Compliance requirements

4.3 Functional Compliance Requirements

Functional compliance is a requirement for all eSIM Products to assure correct operation. The eSIM Test Specification, SGP.23 [3], provides details of all applicable interface and procedural testing.

Each test in SGP.23 [3] can be mapped to a specific set of requirements in the eSIM Technical Specification, SGP.22 [2].

To demonstrate product functional compliance to SGP.22 [2], an eSIM Product shall successfully pass all tests applicable to its supported eSIM capability. The permitted, product dependent, test methodologies are:

- Functional testing via industry partner certification schemes (for eUICC and Devices),
- Functional testing via vendor implemented test methodologies referencing SGP.23 [3] tests (for SM-DP+ and SM-DS).

4.3.1 Functional Compliance via Industry Partner Certification Schemes

eSIM Compliance test programmes have been established by industry certification schemes GlobalPlatform, GCF and PTCRB. These provide the required means of test for eUICCs and Devices, referencing the SGP.23 [3] test requirements.

eUICC (annex A.3) and devices (annex A.2) are judged to have met the eSIM functional compliance requirement for a named product if they have a valid, product specific, certification reference from either Global Platform, GCF or PTCRB.

Product	Product Functional test organisation Compliance requirement (see Annex C for details)		Link to industry certification scheme	
	GCF	GCF Certification including eSIM	GCF	
Device	GCF	GCF eSIM Standalone certification	GCF	
	PTCRB	PTCRB Certification including eSIM	<u>PTCRB</u>	
eUICC	GlobalPlatform, (including SIMalliance profile packages)	GP Product Qualification to: (1) GSMA eUICC Consumer functional test suite (2) SIMalliance Interoperable Profile' test suite	<u>GlobalPlatform</u>	

Table 4: Functional compliance via GSMA industry certification scheme partners

4.3.2 Functional Compliance via Vendor Defined Test Plan

Permitted for Subscription Management products (SM-DP+ and SM-DS). The vendor specified test plans shall reference all SM-DP+/SM-DS tests from the eSIM test specification, SGP.23 [3]. Annex A.4 and Annex A.5 provide further details.

Product type	Vendor specified test plan permitted	Reference
SM-DP+	Yes	SGP.23 [3]
Alt SM-DS	Yes	SGP.23 [3]

Table 5: Functional compliance via Vendor defined test plan

5 eSIM Digital Certificates (PKI)

GSMA ESIM uses a Public Key Infrastructure (PKI) Digital Certificate to authenticate the following eSIM system entities that have been confirmed as SGP.24 compliant:

- eUICC
- SM-DP+
- SM-DS

Digital Certificates are issued and managed in accordance with GSMA's PKI Certificate Policy, SGP.14 [9]. Digital Certificate issuance to SGP.24 compliant product is operated on a commercial basis by GSMA appointed Root CIs.

5.1 Specific Considerations for eUICC Certificates

The manufacturer of an SGP.24 compliant eUICC is eligible to request *an EUM certificate* from the GSMA CI. The issued EUM certificate can be used by the eUICC manufacturer to generate subCA certificates, as needed, to facilitate mass production of the declared eUICC.

An issued EUM (PKI) certificate for the initially declared eUICC product is also allowed to be used with additional eUICC product(s). The following provisions apply:

- A new SGP.24 declaration shall be submitted for each additional eUICC product intending to re-use an EUM certificate,
- The additional product reusing a certificate shall:
 - o Be designed to the same major version of SGP.22 [2] as the initial eUICC,
 - o Have its own evidence of GlobalPlatform functional compliance,
 - Have its own evidence of security evaluation using a GSMA approved methodology valid at the time of declaration (as identified in SGP.24 Annex C),
 - Be manufactured at a SAS accredited site.

A new/updated SGP.24 declaration shall be submitted for any change of SAS site(s) intended to be used to manufacture of a declared product.

Annex A Declaration Templates

An eSIM Product declaration consists of Annex A.1 plus either Annex A.2, A.3, A.4 or A.5, according to the product type. Refer to the SGP.24 zip file for the following Annex A templates:

- A.1 eSIM Product Declaration
- A.2 Details of Declared Device
- A.3 Details of Declared eUICC
- A.4 Details of Declared SM-DP+
- A.5 Details of Declared SM-DS

Annex B VOID

Annex C eSIM Certification Applicability (Normative)

This Annex identifies the current requirements and specification versions for Consumer eSIM compliance declarations, and includes:

- Security requirements,
- Functional requirements, including means of test.
- Currently recognised exemptions from compliance.

Organisations either planning SGP.24 compliance activities, or interested in the current status of compliance requirements are recommended to reference this table when planning product compliance.

	Reference	Version	Applicability	Current status for compliance		Expiry Date	Notes
		(and all previous versions)	All eSIM product	Expired	2018-03-30	2018-12-30	
	eSIM Compliance Process	2.1	All eSIM product	Expired	2019-01-01	2019-09-17	
PRDs		22	All eSIM product	Expired	2019-09-17	2020-06-12-	
GSMA		23	All eSIM product	Active	2020-06-12	-	
	eSIM Test Specification	1.x Refer to: https://www.gsma.com/esim/esim- specification/	All eSIM product	Active	-	Refer to: https://www.gsma.com/esim/esim- specification/	

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GSMA PRD SGP.22	2.0	All eSIM product	Expired	2017-02-06	2018-04-30
eSIM Core Specification: Technical	2.1	All eSIM product	Expired	2017-02-27	2019-12-31
	2.2, 2.2.1 (and later 2.2.x)	All eSIM product	Active	2017-09-01	
GSMA PRD SGP.21	2.0	All eSIM product	Expired	2017-02-06	2018-04-30
eSIM Core Specification: Architecture	2.1	All eSIM product	Expired	2017-02-27	2019-12-31
	2.2	All eSIM product	Active	2017-09-01	
BSI-CC-PP-0084-2014					
Security IC Platform Protection Profile with Augmentation Packages Certification (PP-0084) BSI-CC-PP-0035-2007	1.0	eUICC	Active	2017-10-16	
BSI-CC-PP-0035-2007					
Security IC Platform Protection Profile (PP- 0035)	1.0	eUICC			
GSMA PRD SGP.25	1.0	eUICC	Active Ref Annex A.3.4.2(b) Option 1	2019-11-15	

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	Embedded UICC for Consumer Devices Protection Profile						
	SGP.24 Annex A.3 section A.3.4.2(b), option 2: Interim methodology – implementation focussed security evaluation	SGP.24 v2.2 Annex A.3	eUICC	Active Ref Annex A.3.4.2(b) Option 2	2019-11-15		See table C.2
	GSMA PRD SGP.06 eUICC Security Assurance Principles	1.0	eUICC	Active	2020-07-07	_	
	GSMA PRD SGP.07 eUICC Security Assurance Methodology	1.0	eUICC	Active	2020-07-07		
		Refer to: GSMA.com/SAS for details	eUICC	Active	Refer to GSMA.com/SAS		
		Refer to: GSMA.com/SAS for details	SM-DP+/SM- DS	Active	Refer to GSMA.com/SAS		
Ional	Vendor specified RSP Functional test	n/a	SM-DP+ SM-DS	Active Active	SGP.24v1.0 SGP.24v1.0		
Functional		Refer to GCF for applicable version(s)	Device	Active	SGP.24v2.0		

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GCF RSP Functional Test (Devices)					
Global Platform test suite					
	Refer to GP for applicable	eUICC	Active	SGP.24v2.0	
Permitted Exceptions agreed for SGP.24 declarations	no agreed exceptions in this version	on of SGP.24	-		

Product Types	Description	Security Assurance Scheme Allowed	Re-Certification Trigger

Existing product in the field	produced and ready to be inserted in a device or is inserted in a device which is being used by an end customer or which is in the supply chain from the factory of the device OEM to a store	 originally, assuming updates do not change the initial scope of the product. eSA scheme whether it was used originally, or not. SOG-IS CC scheme whether it was used originally, or not. Certification methodology can be switched at the discretion of the EUM throughout the life cycle of the Existing product in the field. 	 Changes accepted as an update of the Existing product in the field (update of declaration required) constituting a re-certification: Updates for eSIM functional and/or eSIM security issues within the initial scope deployed using the eUICC OS Update as defined in SGP.02 (see statement below) and as referenced in SGP.16 Section 3.5. SGP.02: 'An eUICC should support a secure mechanism to allow the eUICC OS Update when the eUICC is in the field. Such mechanism allows the eUICC Manufacturer to correct errors in existing features on the eUICC'.
	Any eSIM product type with an approved compliance declaration, that has not been inserted in a device in the field (not yet produced)		 Changes accepted as an update of the Existing product variant (update of declaration required) constituting a recertification: Updates for functional and/or security issues within the initial scope. Updates within minor versions of SGP.21/22 and IPP specifications e.g. Consumer (SGP.22) v2.1 to 2.2, or SIMalliance IPP v2.2 to v2.3.1. IC maintenance release of the same IC even if SOG-IS CC certificate is changed or updated. Non-GSMA related OS modification (example: MNO specific features, telco part updates; optimisation and general enhancements).
	Any eSIM product with a new IC platform, a new major version of SGP.21/22 spec or new major version	 For the certification of a New product: Interim methodology can be , for 18 months starting July 2020 and until January 2022, after which only the eSA scheme or SOG-IS CC scheme will be allowed. 	 Situations in which a certification as a New product is required : Change of the IC platform (new IC type/vendor, new technology).

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 of the profile package specification SOG-IS CC scheme; 	 Support for major updates versions of SGP.21/22 specification, e.g. SGP.22 v1.2 to v2.1. Support for major updates versions of the SIMalliance IPP specification e.g. v2.1 to v3.x
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Status for Compliance	Description
Active:	Specification or reference that is currently valid for SGP.24 declarations. Where multiple versions of the same specification or reference are active, the certifier shall identify which version has been used.
Planned:	Specification or reference that is under development.
Expired:	Specification or reference that is no longer valid for SGP.24 declarations.
Deprecated:	Specification or reference for which an expiry date has been stated, and will no longer be recognized for GSMA eSIM compliance after the expiry date.
Permitted:	Permitted as an alternative to a mandatory requirement until the indicated expiry date.
Active from:	The start date from when a specification or reference can be used for SGP.24 declaration.
Expiry date:	The last date on which an SGP.24 declaration can reference the specification or reference. Declarations using an expired specification or reference will not be accepted.

Update requests for this annex, including new requirements, transition timing to new requirements, and expiry dates for deprecated requirements, are via the GSMA CR process. Approved CRs will be reflected in an updated version of this document.

For further details, contact: <u>RSPcompliance@gsma.com</u>.

Annex D Document Management

D.1 Document History

Version	Date	Brief Description of Change	Approval Authority	Editor / Company
V1.0	6 th Feb 2017	Initial version of SGP.24 V1.0 eSIM Compliance Products	RSPLEN/PSMC	Gloria Trujillo, GSMA
V1.1	30 th May 2017	Minor revision to SGP.24 V1.1 ESIM Compliance Products	RSPLEN	Gloria Trujillo, GSMA
V2.0	15 th Feb 2018	Introduction of functional testing via industry certification schemes. Addition of IC based PP for eUICC (PP-0084) as an interim PP (hardware only) whilst the SGP.25 PP is under development. Addition of an eSIM Certification Applicability table as the means to manage compliance requirements and spec dependencies. Restructure of document to be requirements centric.	RSPLEN	Valerie Townsend, GSMA
V2.1	7 th Dec 2018	Compliance process maintenance according to eSIMWG4 agreements	RSPLEN	Valerie Townsend, GSMA
V2.2	29 th May 2019	Updated to include the following CRs: RSPCERT39 Doc 7r1: Section 5: align with SAS on PKI reuse RSPCERT39 Doc 8r1: Section 3.1 added on compliance maintenance. RSPCERT39 Doc 13r0: Annex C updated RSPCERT42 Doc 7r0: Section 4.2 and A.3 on security assurance (interim methodology) RSPCERT42 Doc 6r1: Annex C update to security assurance	eSIM Group	Valerie Townsend, GSMA

	RSPCERT42 Doc19r2: editorials		
	RSPCERT43 Doc 8r2: editorials		
	RSPCERT43bis Doc 3r1:updates following working group review.		
	eSIMWG4#1 Doc 018: updates to Section 3.1 and A.3.4.2 (option 2)		
	CR001R002 Addition of eUICC Assurance Scheme Annex A.3		
V2.3	CR004R005 Annex A.4 - Details of SGP.23 testing related to Application Note Issues and check box for revised declaration CR006R001 SGP.24 Introduce GSMA eSA	eSIM Group	Gloria Trujillo, GSMA
	CR007R001 Changes in Annex C		

D.2 Other Information

Туре	Description
Document Owner	Gloria Trujillo
Editor / Company	GSMA

It is our intention to provide a quality product for your use. If you find any errors or omissions, please contact us with your comments. You may notify us at prd@gsma.com

Your comments, suggestions or questions are always welcome.