

SECTION	SECTION NAME	CA/Root Inclusion Considerations (DRAFT) ( <a href="https://wiki.mozilla.org/CA/Root_Inclusion_Considerations">https://wiki.mozilla.org/CA/Root_Inclusion_Considerations</a> )	CA COMMENTS
<b>1. Root Inclusion Considerations</b>			
1.1	Unacceptable Behavior	There is Reasonable suspicion that the CA is closely tied, through ownership or operation, to a company engaged in any of the following: the distribution of malware or spyware; network surveillance; or cyber espionage.	BJCA has no business affiliation with companies engaged in malware or spyware distribution, network monitoring, or cyber espionage. The Beijing One Pass software which has been addressed in the inclusion discussions is a digital certificate application security suite developed by BJCA. We have no intention to compromise the operating environment or collecting user privacy information with the software, and the software is not malicious software or spyware.
1.1	Unacceptable Behavior	The CA operator is in a global region that cannot use the CCADB, or is not capable of entering into a contractual agreement with a US-based company.	BJCA can use CCADB and can enter into contractual agreements with US companies.
1.1	Unacceptable Behavior	The CA operator has done any of the following: Mis-issued a large or unknown number of end-entity or intermediate certificates that they are not able to enumerate; Deliberately violated Mozilla's Root Store Policy or other applicable policy; or Lied, concealed, or failed to disclose the full extent of a problem.	BJCA has no such behavior.
1.2	Concerning Behavior	The CA's provided address is a mail drop, rather than an office.	The address provided by BJCA is the office.
1.2	Concerning Behavior	The CA's auditor has not audited other CAs whose root certificates are already included in Mozilla's Root store.	The auditor has experiences in auditing CAs which have been included in Root Programs.

1.2	Concerning Behavior	The CA's representatives are evasive on matters such as legal domicile and ownership.	BJCA has no such behavior.
1.2	Concerning Behavior	The CA has physical, monetary, or business nexus to a government of a country that has an Internet Freedom Score less than 50; or has a score less than 50 on the Corruption Perceptions Index	BJCA only serves the Chinese market now, and the certificate business covers the government affairs domain.
1.2	Concerning Behavior	The CA is associated with a government that has or is forcing end-users to install a government-issued root certificate on their devices, or the government has used certificates issued by the CA to intercept network communications.	BJCA has no such behavior.
1.2	Concerning Behavior	The CA is owned or funded by an individual or government organization that is known to also own or fund a vendor that has provided software being used for network surveillance or cyber espionage.	BJCA has no such behavior.
1.2	Concerning Behavior	The CA uses a shell company, an acquisition, or other misdirection to divert attention away from their relationship with another organization or government.	BJCA has no such behavior.
1.3	Warning Signs	Has Certificate Change Prioritization score of P4 or P5.	Currently, BJCA is P2.
1.3	Warning Signs	Is not a member of the CA/Browser Forum (CABF) Server Certificate Working Group (when applying for the Websites trust bit) or the CABF S/MIME Certificate Working Group (when applying for the Email trust bit).	BJCA is a member of the CA/Browser Forum (CABF) Server Certificate Working Group.
1.3	Warning Signs	Is a Super-CA that signs the certificates of subordinate CAs to only show that they have been accredited or licensed by the signing CA (i.e. the super-CA does not guarantee that their subCAs comply with the BRs and Mozilla's root store policy).	BJCA is not a Super-CA. Both its root CAs and intermediate CAs are operated by BJCA independently. No SubCAs operated by entities outside BJCA.
1.3	Warning Signs	Has audit statements from an auditor whose auditor qualifications are insufficient or do not pass the verification checks for WebTrust auditors or ETSI auditors.	The auditor of BJCA is an licensed WebTrust practitioner. The working persons have been verified and qualified by CPA Canada and enlisted in the license agreement.
1.3	Warning Signs	Has gaps between audit periods.	So far the audit periods are continuous and have no gaps. We understood this requirement.

1.3	Warning Signs	Does not fully comply with the CABF Baseline Requirements that are relevant to the trust bits they are applying for.	We understood the BR requirements and BJCA's operation is compliant with BR.
1.3	Warning Signs	Does not fully comply with Mozilla's Root Store Policy or <a href="https://wiki.mozilla.org/CA/Required_or_Recommended_Practices#Required_Practices">https://wiki.mozilla.org/CA/Required_or_Recommended_Practices#Required_Practices</a>	BJCA's operation is compliant with Mozilla's Root Store Policy.
1.3	Warning Signs	Does any of the activities listed in <a href="https://wiki.mozilla.org/CA/Forbidden_or_Problematic_Practices#Forbidden_Practices">https://wiki.mozilla.org/CA/Forbidden_or_Problematic_Practices#Forbidden_Practices</a>	BJCA has no such behavior.