

Amendment of BR 7.1.4.2.2, EVGL 9.2.5 & 9.2.7

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Topic 1:Amendment of BR 7.1.4.2.2 e/f



The issue we want to solve in BR

- ❖ In SSL BR version 1.4.1 section 7.1.4.2.2 e & f, either localityName or stateOrProvinceName is required for OV ,EV & IV SSL Certificates.
- ❖ As CABF Bugzilla Bug#2 https://bugzilla.cabforum.org/show_bug.cgi?id=2, We suggest to amend SSL BR 7.1.4.2.2 e & f to solve below situations:
 - (1). For small countries/jurisdictions, if they do not set up any state or province.
 - Some CAs misplaced absence province or state name.
 - (2). The organizationName is already unique at the country level, such as a company in Taiwan.



The organizationName is already unique at the country level

- If the subject:organizationName and subject:countryName fields are present and the country/jurisdiction specified by the subject:countryName field has a centralized registry for that kind of organizations so that the organization name specified by the subject:organizationName field is "unique" in the entire country/jurisdiction.
- Those centralized registry databases are QGIS(Qualified Government Information Source,) or QTIS(Qualified Government Tax Information Source) , and government law keep the organizations' names are unique.



The company name must be unique for the whole country in Taiwan

- In Taiwan, according our Company Act, the company name must be unique for the whole country
 - http://law.moj.gov.tw/Eng/LawClass/LawAll.aspx?PCod e=J0080001
- Company Act article 18 as below

No company may use a corporate name which is identical with that of another company. Where the corporate names of two companies contain any marks or identifying words respectively that may distinguish the different categories of business of the two companies, such corporate names shall not be considered identical with each other.



A company may conduct any business that is not prohibited or restricted by the laws and regulations, except for those requiring special approvals which shall be explicitly described in the Articles of Incorporation of the company.

Any category of business to be conducted by a company shall, when making the registration thereof, be identified with the Category Code applicable to the said business category as assigned in the Table of Categories of Businesses by the central competent authority. For a company which has already been registered, and the category of business conducted by it is registered with descriptive words, then, such descriptive words shall be replaced with the applicable Category Code as assigned in the foregoing Table, while applying for alteration of the entries of existing company registration record.



A company shall not use a name which tends to mislead the public to associate it with the name of a government agency or a public welfare organization, or has an implication of offending against public order or good customs.

Before proceeding to the company incorporation registration procedure, a company shall first apply for approval and reservation, for a specific period of time, of its corporate name and the scope of its business. Rules for examination and approval of such application shall be prescribed by the central competent authority.



the X.500 naming semantics

- ❖ According to our understand of the X.500 naming semantics, the meaning of "C=XX, ST=Place A" is to narrow down the naming space into the range of "Place A of Country XX" so that we can distinguish some entity from others within the naming space.
- Therefore, the DN "C=XX, L=Place A, O=Oragnization1" is used to distinguish Oragnization1 within the naming space of "C=XX, L=Place A" from other entities.
- The same concept applies to stateOrProvinceName(ST).



narrowing down naming space into some region of the county

- Some people might interpret the meaning of "C=XX, L=Place A, O=Oragnization1" as "Organization1 is located at Place A of Country XX".
- ❖ However, we should note that the meaning of "narrowing down naming space into some region of the county" is not always the same with the meaning of "being located at some region of the county".



Let's take Taiwan as an example(1/3)

- In Taiwan, according our Company Law, the company name must be unique for the whole country.
- Furthermore, our Company Law requires the company to register its business location which will be some city or county.



Let's take Taiwan as an example(2/3)

- This is an example where the legally naming uniqueness scope for an entity is not the same as where the entity is legally located.
- ❖In Taiwan, since the company name must be unique for the whole country, the subject DN for a company, such as Chunghwa Telecom, should look like
 - "C=TW, O=Chunghwa Telecom Co., Ltd



Let's take Taiwan as an example(3/3)

- This subject DN already uniquely identifies the company.
- There is no necessary to add RDNs such as locality(L), or stateOrProvinceName(ST) into the subject DN.
- ❖ If we specify the subject DN as "C=TW, L=Taipei City, O=Chunghwa Telecom Co., Ltd.", that will mean it is a company registered in Taipei City.
 - This will not conform to our Company Law because companies in Taiwan are registered in the country level not in the municipal level.



the subject DN for a government entity in Taiwan

- The subject DN for a central government entity in Taiwan obey the same rule, for example,
 - C=TW, O=Executive Yuan, OU=National Development Council
 - So the DN of a NDC's server certificate will be
 - SERIALNUMBER = 000000010026835,CN = www.cp.gov.tw ,OU = National Development Council, O = Executive Yuan, C = TW
- The subject DN for a local government entity, for example,
 - SERIALNUMBER = 000000010026435, CN =
 eform.taichung.gov.tw, OU = Civil Affairs Bureau, O = City
 Government, L = Taichung City, C = TW
- I translate some traditional Chinese characters of O,OU to English in above example.



the subject DN for an entity in GPKI of Taiwan

- In Taiwan, There are Certificate and CRL profiles for Government Public Key Infrastructure more than 14 years.
- Also there is an auditor of Taiwan' GPKI, Shu-Chen Hsiu (David) of KPMG Taiwan, joining 39th F2F meeting.
- Let' s see Subject DN of device certificate of US Federal PKI next slide.



Subject Name form for Device Certificate in US Federal PKI

- Page 39 of "Worksheet 7: Certificate Profile for Computing and Communications Devices" of "X.509 Certificate and Certificate Revocation List (CRL) Extensions Profile for the Shared Service Providers (SSP) Program "said the name form of the subject RDN Must use one of the name forms specified in Section 3.1.1 of the Common Certificate Policy.
 - Certificate and Certificate Revocation List (CRL) Extensions Profile for SSP Program
 - https://www.idmanagement.gov/IDM/servlet/fileField?entityId=ka0t00 00000TNP2AAO&field=File_Body_s
 - Common Certificate Policy.
 - https://www.idmanagement.gov/IDM/servlet/fileField?entityId=ka0t00 00000TN9iAAG&field=File_Body_s



Section 3.1.1 of the Common Certificate Policy

Devices that are the subject of certificates issued under this policy shall be assigned either a geo-political name or an Internet domain component name. Device names shall take one of the following forms:

C=US, o=U.S. Government, [ou=department], [ou=agency], [ou=structural_container], cn=device name

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dc=gov, dc=org0, [dc=org1], ..., [dc=orgN], [ou=structural_container], [cn=device name]
```

Where device name is a descriptive name for the device. Where a device is fully described by the Internet domain name, the common name attribute is optional.



- ❖ Please note that the first name form is X.500 name form, which can not have State or Province Name or Locality Name.
- ❖ For example, the United States Federal Department of the Treasury 's Server's DN in accordance with the Common Certificate Policy rules should be C = US, O = US Government, OU = Department of the Treasury, CN=FQDN of DoT Server.
- If the DN in accordance with SSL BR named
- C = US, L = Washington DC, O = US Government, OU = Department of the Treasury, <math>CN = FQDN of DoT Server, or
- C = US, S = Washington D.C., O = US Government, OU = Department of the Treasury, <math>CN = FQDN of Department of the Treasury 's Server, or
- C = US, S=D.C., L= Washington, O = US Government, OU = Department of the Treasury, CN=FQDN of DoT Server
- These DN will make people feel very strange.



The issue is open in EU (1/2)

- In EU, "We found it is not suitable to enforce the CA to insert locality(L) or stateOrProvinceName(ST) into the subject DN in small country" remains still open as it is the same in other EU countries too.
- Please see https://portal.etsi.org//TBSiteMap/ESI/ESIActivities.aspx
 - a. ETSI EN 319 412-1 "Electronic Signatures and Infrastructures (ESI); Certificate Profiles; Part 1: Overview and common data structures".
 - b. ETSI EN 319 412-3 "Electronic Signatures and Infrastructures (ESI); Certificate Profiles; Part 3: Certificate profile for certificates issued to legal persons".
 - C.319 412-4 v1.1.1: Certificate profile for web site certificates issued to organisations
- https://cabforum.org/pipermail/public/2016-July/007915.html, from Moudrick M. Dadashov



The issue is open in EU (2/2)

The minimal set of Subject info for legal person in Electronic Signatures and Infrastructures (ESI); Certificate Profiles; Part 3: Certificate profile for certificates issued to legal persons are

4.2.1 Subject

The subject field shall include at least the following attributes as specified in Recommendation ITU-T X.520 [1]:

- countryName;
- organizationName;
- organizationIdentifier; and
- commonName.



DN in SSL certificates of two banks located in special municipality by Globalsign

- https://ebank.com.tw
 CN = *.cotabank.com.tw
 0 = COTA Commercial Bank
 OU = ITD
 L = Taichung
 S = Taichung
 C = TW
- https://accessible.bok.com.tw/
 CN = *.bok.com.tw

 0 = BANK OF KAOHSIUNG CO., LTD.

 OU = MIS Dept.
 L = Kaohsiung
 S = Taiwan
 C = TW
- No Taichung Province in Taiwan, only Taichung city in Taiwan.
- Taichung City, Kaohsiung City, Taoyuan City, Tainan City, Ney Taipei City and Taipei City are the 6 special municipalities in Taiwan.
- Banks are companies in Taiwan.



Small businesses according to Taiwan's Business Registration Law

- On the other hand, in Taiwan, we have small businesses (such as stores,) that are established and registered according to our Business Registration Law (http://law.moj.gov.tw/Eng/LawClass/LawAll.aspx?P Code=J0080004).
- ❖ In Taiwan, small businesses are registered in municipal level (that will be a city, a county or a special municipality).
- The Business Registration Law requires that the name of the small business must be unique with the municipality (where it is registered). See Article 28



Suitable subject DN for small businesses

- For example, there might be a small business named "ABC Store" registered in New Taipei City, while there might be another "ABC Store" registered in Pingtung county.
- Therefore, the suitable subject DN for these two small businesses will be

```
"C=TW, L=New Taipei City, O=ABC Store" and "C=TW, L= Pingtung county, O=ABC Store" respectively.
```

Small businesses are belong to "business entities" in EVGL.



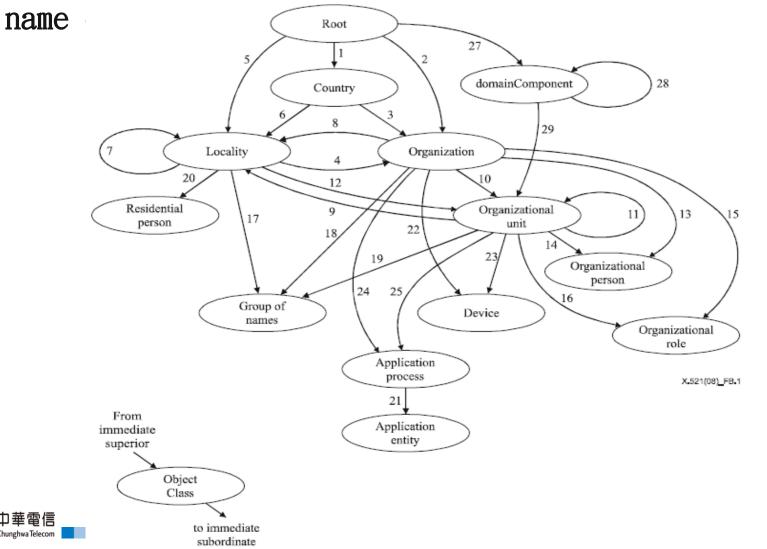
it is not suitable to enforce the CA to insert either L or ST into the subject DN

- In Taiwan, a corporation can be registered at country-level but can also be register at city/countylevel.
- ❖ If there is a country-level corporation named "Farmer' s Association" of which physical address is located in Taipei City, with current Subject DN rule of BR, its Subject DN will be "C=TW, L=Taipei City, O=Farmer' s Association".
- However, if there is also a city/county-level "Farmer's Association" in Taipei City, its Subject DN will also be "C=TW, L=Taipei City, O=Farmer's Association".
- How do you distinguish them by DN?



Annex B of ITU-T X.521 (Suggested name form and Directory information tree structures)

 \diamond Please note path 1 \rightarrow 3, it suggests that there is no need to include a Locality attribute in the directory



Chunghwa Telecom

SSL BR 7.1.4.2.2 Subject Distinguished Name Fields

V1.4.1

Dr. Ben Wilson of DigiCert's version 7.1.4.2.2 Subject Distinguished Name

7.1.4.2.2 Subject Distinguished NameFieldse. Certificate Field: subject:localityName

(OID: 2.5.4.7)

Required if the subject:organizationName field, subject:givenName field, or subject:surname field are present and the

subject:stateOrProvinceName field is absent.

Optional: if the subject:stateOrProvinceName field and the subject:organizationName field, subject:givenName field, or

subject:givenName field, or subject:surname field are present.

Fields
e.Certificate Field: subject:localityName
(OID: 2.5.4.7)

Required if the subject:organizationName field subject:givenName field, or subject:surname field are present and the subject:stateOrProvinceName field is absent.

Optional if: (a) the subject:stateOrProvinceName field and the subject:organizationName field, subject:givenName field, or subject:surname field are present., or (b) if the country name provided under subsection h. is Taiwan (TW), Singapore (SG), etc..

SSL BR 7.1.4.2.2 Subject Distinguished Name Fields

Dr. Ben Wilson of DigiCert's version V1.4.1 7.1.4.2.2 Subject Distinguished Name 7.1.4.2.2 Subject Distinguished Name **Fields Fields** f.Certificate Field: f.Certificate Field: subject:stateOrProvinceName (OID: subject:stateOrProvinceName (OID: 2.5.4.8) 2.5.4.8) **Required** if the subject:organizationName **Required** if the field, subject:givenName field, or subject:surname field are present and subject:organizationName field, subject:givenName field, or subject:localityName field is absent. subject:surname field are present and **Optional** if: (a) the subject:localityName subject:localityName field is absent. field and the subject:organizationName field, **Optional** if the subject:localityName and subject:givenName field, or field and the subject:organizationName subject:surname field are present. field, and subject:givenName field, or t, or (b) if the country name provided under



subject:surname field are present.

(SG), etc...

subsection h. is Taiwan (TW), Singapore

SSL BR 7.1.4.2.2 Subject Distinguished Name Fields

V1.4.1

Dr. Wen-Cheng Wang of Chunghwa Telecom's Version

Fields e. Certificate Field: subject:localityName (OID: 2.5.4.7) Required if the subject:organizationName field, subject:givenName field, or subject:surname field are present and

is absent.

Optional: if the subject:stateOrProvinceName field and the subject:organizationName field, subject:givenName field, or subject:surname field are present.

the subject:stateOrProvinceName field

7.1.4.2.2 Subject Distinguished Name

7.1.4.2.2 Subject Distinguished Name Fields
e.Certificate Field: subject:localityName (OID: 2.5.4.7)
Required if the subject:organizationName field,
subject:givenName field, or subject:surname field are
present and the subject:stateOrProvinceName field is
absent.

Optional if: (a) the subject:stateOrProvinceName field and the subject:organizationName field, subject:givenName field, or subject:surname field are present. or (b) if the subject:organizationName and subject:countryName fields are present and the country/jurisdiction specified by the subject:countryName field has a centralized registry for that kind of organizations so that the organization name specified by the subject:organizationName field is "unique" in the entire country/jurisdiction. Normally, situation (b) may exist in small countries/jurisdictions such as Singapore (SG), Taiwan (TW), etc.

7.1.4.2.2 Subject Distinguished Name Fields

V1.4.1

Dr. Wen-Cheng Wang of Chunghwa Telecom's Version

7.1.4.2.2 Subject Distinguished Name Fields

f.Certificate Field:

subject:stateOrProvinceName (OID: 2.5.4.8)

Required if the

subject:organizationName field, subject:givenName field, or subject:surname field are present and subject:localityName field is absent.

Optional if the subject:localityName field and the subject:organizationName field, and

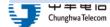
subject:givenName field, or subject:surname field are present.

7.1.4.2.2 Subject Distinguished Name Fields f.Certificate Field: subject:stateOrProvinceName
(OID: 2.5.4.8)

Required if the subject:organizationName field, subject:givenName field, or subject:surname field are present and subject:localityName field is absent.

Optional if: (a) if the subject:localityName field and the subject:organizationName field, and subject:givenName field, or subject:surname field are present., or (b) if the subject:organizationName and subject:countryName fields are present and the country/jurisdiction specified by the subject:countryName field has a centralized registry for that kind of organizations so that the organization name specified by the subject:organizationName field is "unique" in the entire country/jurisdiction.

Normally, situation (b) may exist in small countries/jurisdictions such as Singapore (SG), Taiwan (TW), etc.



a straw poll by Ben but only 2 responses

https://cabforum.org/pipermail/public/2016-August/008292.html

All,

This topic was discussed again today in the Policy Review Working Group.

Can we move this discussion toward a solution that works for Taiwanese entities? Here are a couple of suggestions:

- 1 exception based on government registry of unique names (e.g. an enumerated list of countries/jurisdictions/territories with centralized registries that ensure that an organization name is unique in the entire country/jurisdiction)
- 2 exception based on geographic size (e.g. an enumerated list of countries/jurisdictions/territories where the geographic area specified by the subject:countryName field is below a threshold, for example, less than 200,000 sq. km.)
- 3 either of the above (both as options)
- 4 neither of the above (no change)

Are there other suggestions? Should we have a straw poll to see which one is favored before we draw up a ballot?

Ben



Topic 2:Amendment of EVGL 9.2.5 & 9.2.7



The issue we want to solve in EVGL 9.2.5 (1/3)

- https://cabforum.org/pipermail/public/2016-August/008227.html
- ❖ In EVGL Section 9.25, the jurisdiction for the applicable Incorporating Agency or Registration Agency at the locality level MUST include the country and state or province information, where the state or province regulates the registration of the entities at the locality level, as well as the locality information. Country information MUST be specified using the applicable ISO country code. State or province or locality information (where applicable) for the Subject's Jurisdiction of Incorporation or Registration MUST be specified using the full name of the applicable jurisdiction.



The issue we want to solve in EVGL 9.2.5 (2/3)

For a business entity such as "ABC store" in Tainan city (a special municipality, Direct-controlled municipality), the Subject DN will be

```
CN = ABC Store's FQDN

O = ABC Store

L = Tainan City

C = TW

PostalCode = 10001

STREET = ABC Store's street Address

SERIALNUMBER = ABC Store's uniform number of tax status

1.3.6.1.4.1.311.60.2.1.1 = Tainan City

1.3.6.1.4.1.311.60.2.1.2 = ?

2.5.4.15 = Business entity
```



Direct-controlled municipality

- ❖ In https://en.wikipedia.org/wiki/Direct-controlled_municipality, there are 11 countries have Direct-controlled municipalities. I doubt there will be the same problem for EV SSL certificates in these 11 coutries.
 - More information can be find in https://zh.wikipedia.org/wiki/%E7%9B%B4%E8%B E%96%E5%B8%82, but they were written in traditional Chinese, may be you could use Google online translation.



The issue we want to solve in EVGL 9.2.5 (3/3)

- As the rank of Tainan City, in current law and EVGL, I don't know how to give the value for 1.3.6.1.4.1.311.60.2.1.2 (jurisdictionStateOrProvinceName) attribute
- The issue will also appears in small countries without State/Province like Taiwan (they have special municipalities, cities, counties) and Singapore, etc.



The issue we want to solve in EVGL9.2.7 (1/2)

- https://cabforum.org/pipermail/public/2016-August/008228.html
- 9.2.7. Subject Physical Address of Place of Business Field Certificate fields:

Number and street: subject:streetAddress (OID: 2.5.4.9)

City or town: subject:localityName (OID: 2.5.4.7)

State or province (where applicable):

subject:stateOrProvinceName (OID: 2.5.4.8)

Country: subject:countryName (OID: 2.5.4.6)

Postal code: subject:postalCode (OID: 2.5.4.17)

Required/Optional: City, state, and country – Required; Street and postal code – Optional Contents: This field MUST contain the address of the physical location of the Subject's Place of Business.



The issue we want to solve in EVGL9.2.7 (2/2)

- ❖ I suggest to amend above paragraph about "state is required" for the address of Subject's place of Business for small countries without State/Province and for those Direct-controlled municipality (Special municipality).
- Kirk has mailed me a solution as page 40



Amendment of EVGL section 9.2.5.

V1.6.0 1. Chun CHEN of Chunghwa Telecom's version 9.2.5. Subject Jurisdiction of Incorporation or Registration Field Certificate fields: Locality (if required): Subject: jurisdictionLocalityName (OID: 1.3.6.1.4.1.311.60.2.1.1) ASN 1. X520LocalityName as ASN 1. X520LocalityName as			
Incorporation or Registration Field Certificate fields: Locality (if required): subject: jurisdictionLocalityName (OID: 1.3.6.1.4.1.311.60.2.1.1) Incorporation or Registration Field Certificate fields: Locality (if required): subject: jurisdictionLocalityName (OID: 1.3.6.1.4.1.311.60.2.1.1)	V1.6.0	Li-Chun CHEN of Chunghwa Telecom's version	
subject:jurisdictionLocalityName subject:jurisdictionLocalityName (OID: 1.3.6.1.4.1.311.60.2.1.1) (OID: 1.3.6.1.4.1.311.60.2.1.1)	Incorporation or Registration Field	Incorporation or Registration Field	
specified in RFC 5280 State or province (if required): subject:jurisdictionStateOrProvince Name (OID: 1.3.6.1.4.1.311.60.2.1.2) specified in RFC 5280 State or province (if required): subject:jurisdictionStateOrProvince ame (OID: 1.3.6.1.4.1.311.60.2.1.2)	subject:jurisdictionLocalityName (OID: 1.3.6.1.4.1.311.60.2.1.1) ASN.1 - X520LocalityName as specified in RFC 5280 State or province (if required): subject:jurisdictionStateOrProvince Name (OID: 1.3.6.1.4.1.311.60.2.1.2) ASN.1 - X520StateOrProvinceName as specified in RFC 5280 Country: subject:jurisdictionCountryName (OID: 1.3.6.1.4.1.311.60.2.1.3) ASN.1 - X520countryName as	subject:jurisdictionLocalityName (OID: 1.3.6.1.4.1.311.60.2.1.1) ASN.1 - X520LocalityName as specified in RFC 5280 State or province (if required): subject:jurisdictionStateOrProvinceN ame (OID: 1.3.6.1.4.1.311.60.2.1.2) ASN.1 - X520StateOrProvinceName as specified in RFC 5280 Country: subject:jurisdictionCountryName (OID: 1.3.6.1.4.1.311.60.2.1.3) ASN.1 - X520countryName as	

Amendment of EVGL section 9.2.5.

V1.6.0

Required/Optional: Required

Contents: These fields MUST NOT contain information that is not relevant to the level of the Incorporating Agency or Registration Agency. For example, the Jurisdiction of Incorporation for an Incorporating Agency or Jurisdiction of Registration for a Registration Agency that operates at the country level MUST include the country information but MUST NOT include the state or province or locality information. Similarly, the jurisdiction for the applicable Incorporating Agency or Registration Agency at the state or province level MUST include both country and state or province information, but MUST NOT include locality information. And, the jurisdiction for the applicable Incorporating Agency or.

Li-Chun CHEN of Chunghwa Telecom's version

Required/Optional: Required

Contents: These fields MUST NOT contain information that is not relevant to the level of the Incorporating Agency or Registration Agency. For example, the Jurisdiction of Incorporation for an Incorporating Agency or Jurisdiction of Registration for a Registration Agency that operates at the country level MUST include the country information but MUST NOT include the state or province or locality information. Similarly, the jurisdiction for the applicable Incorporating Agency or Registration Agency at the state or province level MUST include both country and state or province information, but MUST NOT include locality information. And, the jurisdiction for the applicable Incorporating Agency



Amendment of EVGL section 9.2.5.

V1.6.0

or Registration Agency at the locality level MUST include the country and state or province information, where the state or province regulates the registration of the entities at the locality level, as well as the locality information. Country information MUST be specified using the applicable ISO country code. State or province or locality information (where applicable) for the Subject's Jurisdiction of Incorporation or Registration MUST be specified using the full name of the applicable jurisdiction.

Li-Chun CHEN of Chunghwa Telecom's version

or Registration Agency at the locality level MUST include the country and state or province information, where the state or province regulates the registration of the entities at the locality level, as well as the locality information. Country information MUST be specified using the applicable ISO country code. State or province or locality information (where applicable) for the Subject's Jurisdiction of Incorporation or Registration MUST be specified using the full name of the applicable jurisdiction. If (1)A country without State or province or (2) the applicable Incorporating Agency or Registration Agency are directcontrolled municipalities or special municipalities, the jurisdiction for the applicable Incorporating Agency or Registration Agency at the locality level MUST include the country and the locality information.

Amendment of EVGL section 9.2.7.

V1.6.0	Kirk of Entrust's version
9.2.7 Subject Physical Address of	9.2.7 Subject Physical Address of Place of Business
Place of Business Field	Field
Certificate fields:	Certificate fields:
Number and street:	Number and street: subject:streetAddress (OID:
subject:streetAddress (OID: 2.5.4.9)	2.5.4.9)
City or town: subject:localityName	City or town: subject:localityName (OID: 2.5.4.7)
(OID: 2.5.4.7) State or province	State or province (where applicable):
(where applicable):	subject:stateOrProvinceName (OID: 2.5.4.8)
subject:stateOrProvinceName (OID:	Country: subject:countryName (OID: 2.5.4.6)
2.5.4.8)	Postal code: subject:postalCode (OID: 2.5.4.17)
Country: subject:countryName (OID:	Required/Optional: City, state, and country –(except
2.5.4.6)	that state is not required in countries where states or
Postal code: subject:postalCode (OID:	provinces do not exist or are not used as a component
2.5.4.17)	of an address, such as countries that are unitary states
Required/Optional: City, state, and	with direct-controlled municipalities) Required;
country – Required; Street and postal	Street and postal code – Optional
code – Optional	Contents: This field MUST contain the address of
Contents: This field MUST contain	the physical location of the Subject's Place of
the address of the physical location of	Business.
the Subject's Place of Business.	

