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# Feedback from: Deutsche Telekom AG

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**Submitted by**
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**User type**
Company/business

**Organisation**
Deutsche Telekom AG

**Organisation size**
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**Country of origin**
Belgium

**Initiative**
EU digital ID scheme for online transactions across Europe *(/info/law/better-regulation/have-your-say/initiatives/12528-EU-digital-ID-scheme-for-online-transactions-across-Europe_en)*

Deutsche Telekom AG welcomes the Commission's initiative to revise and expand the eIDAS regulation. It favors a combination of the three described options. The EUid should go far beyond the current approach and enable its use in both the public and the private sector.
In contrast to today's private approaches, the EUid must be available to all citizens. The required security must be on a high technical level, guarantee digital sovereignty, support a security-by-design approach and enable a fully decentralized use of the EUid on the high level of European requirements for data protection and data economy.
The previous technology openness of eIDAS lead to interpretations of requirements and to an equalization of hardware and software solutions. EIDAS-compliant solutions that use secure hardware such as secure elements in smartphones (SEs) should be preferred in any case due to the significantly increased protection e.g. against identity thefts. Therefore, at least the introduction of a mechanism strength definition in addition to the levels of assurance (LOA) is favored, in which the implementation on evaluated security hardware should lead to a higher value. This could be marked with a "+", e.g. "low+, substantial+ and high+". It also would be desirable to define an evaluation- and certification process according to eIDAS at least in level "high" in order to guarantee a uniform LOA.
An additional task is to create the legal and regulatory framework for a non-discriminatory use of the SEs for service providers. The existing standardization enables the establishment of a standardized core component of the ecosystem for the administration of EUids on the SEs. This component should be made available both to all smartphone manufacturers and service providers without any kind of discrimination. This is the only way to cover a wide range of smartphones and to prevent isolated solutions from individual manufacturers or service providers, that have previously prevented broad market coverage.
The new eIDAS regulation should make it possible to derive an eID from various underlying IDs such as an electronic identity card. A level of trust should be defined for eIDs, that indicates both the "level" of the underlying, and of the derived EUid, and can also underline the use of hardware security.
The new eIDAS regulation is intended to enable integration in many scenarios and to support implementation rules and global device and browser standards. An X.509 PKI would be possible as a basis.
In addition to technical interoperability, legal interoperability is particularly important. This should be guaranteed across the entire range of EUid applications. In addition to the requirements, e.g. qualified server certificates to be checked by a device application or a browser, should also be addressed. Goals are uniform standards and legal requirements for the identification of natural and legal persons across all applications.
The acceptance of the guideline is of crucial importance. In order to avoid hurdles on ID providers, developers and integrators side – especially for use in the private sector – possible implementation regulations must enable an easy implementation and integration into existing systems. This principle applies to websites and entities that already require identification and can achieve a higher level of security by the new eIDAS regulation.

For the acceptance on the part of the citizens, an eIDAS-compliant system must be easy to set up and easy to use. In addition, offline authentication, offline identification and anonymous authentication should be possible. The use of the system should also be easier or as simple as a username-password combination.

It is essential that administrative processes in European Member States continue to be harmonized and adapted to the digital age. The aim here is to consistently avoid media breaks and to design the processes in a user-friendly and administration-optimized manner.

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