

Request for Comment (RFC) Process Guide

VERSION 1.1 | JULY 2021



Purpose of this Guide

Request for comment (RFC) periods are opportunities for PCI SSC stakeholders to provide feedback on existing and new PCI Security Standards. This feedback plays a critical role in the ongoing maintenance and development of such resources for the payment card industry. PCI SSC developed this RFC Process Guide to help stakeholders understand and participate in the RFC process.

Applicable Documents and Details

Table 1: PCI SSC RFCs: Applicable Documents and Details

PCI SSC Document (See Table 2 - Revision Types for PCI SSC Standards)	Purpose of RFC ^[1]	RFC Audience ^[2]	Minimum Number of RFCs	Minimum Duration of RFC ^[3]	When RFC Feedback is Provided to POs ^[4]
New Standard (not previously released)	Feedback on an initial draft	SME ^[5]	Two	30 days	With next RFC
	Feedback on updated draft, including proposed modifications from first RFC	Full		30 days	Upon publication of the standard
Existing standard – major revision (e.g., v1.0)	Feedback on current version ^[6]	Full or SME ^[5]	Two	30 days	With next RFC
	Feedback on updated draft, including proposed modifications from first RFC	Full			Upon publication of the standard
Existing standard – minor revision (e.g., v1.1)	Feedback on proposed modifications to current version	Full	One	30 days	Upon publication of the standard
Existing standard – limited revision (e.g., v1.1.1)	Feedback on proposed modifications to current version	SME ^[5]	One	30 days	Upon publication of the standard

^[1] PCI SSC may generate RFCs on either a complete or a partial standard, as needed.

^[2] Audience determined by RFC topic, but typically includes POs, applicable assessors, ASVs, the PCI SSC Board of Advisors, PCI labs, PCI vendors, taskforce members, and others.

^[3] Calendar days.

^[4] PCI SSC will post RFC feedback in the PCI SSC portal.

^[5] Subject matter experts (SME) – Depending on the standard, different SME audiences may be asked to participate in a targeted RFC. For example, a task force, the PCI SSC Board of Advisors, or PCI-Recognized Labs may be asked to review updates to specific documents pertinent to their roles with PCI SSC.

^[6] May be a clean, current version or include proposed changes.

Note: Other PCI SSC documents may be provided for a formal RFC period under the Exception Process outlined in Table 4 of this document. Any other deviations from RFC processes documented herein are also subject to the Exception Process below.

Revision Types

Table 2: Revision Types for PCI SSC Standards

Type of Revision	Potential Reasons for Revision
Major (e.g., v1.0)	<ul style="list-style-type: none"> Restructure of standard such that reporting structure, portals, etc. need to change. Significant updates to address technology changes or current threats to the payment ecosystem; may require investment by complying entities.
Minor (e.g., v1.1)	<ul style="list-style-type: none"> Changes that do not meet threshold of a major revision. Additions or modifications that change the intent of sub-requirements and/or testing procedures. Changes that result in an update to implementation deadlines. Examples include updates to address a new vulnerability or threat.
Limited (e.g., v1.1.1)	<ul style="list-style-type: none"> Changes that do not meet the threshold of minor revision. Changes to sub-requirements and/or testing procedures to clarify intent or address confusing language.
Errata	<ul style="list-style-type: none"> Address format and clerical issues, such as typographical errors and misnumbering, or updates to amend future-dated requirements that have become mandatory. Updates that consist only of errata are not subject to RFC. Major, minor, or limited revisions that also include errata will be subject to RFC per this <i>PCI SSC RFC Process Guide</i>.

RFC Process

Table 3: PCI SSC RFC Process Steps

Process Steps	Details
<p>1. PCI SSC provides community with notice prior to start of RFC.</p>	<ul style="list-style-type: none"> • PCI SSC updates the RFC page on the PCI SSC website with upcoming RFCs as soon as RFC timing is known. • A minimum of 14 days' notice prior to commencement of the RFC via targeted e-mails.
<p>2. PCI SSC prepares documents for the RFC.</p>	<p>Documents in an RFC can include:</p> <ul style="list-style-type: none"> • Standard or other subject document. • “Read Me First” document with RFC overview and instructions. • Summary of Changes document, if applicable. • Other documents related to the standard or subject document. • Other documents that aid the participants' understanding of the RFC.
<p>3. PCI SSC prepares the PCI SSC portal for the RFC.</p>	<p>Each RFC has its own section in the PCI SSC portal with specific RFC materials, including:</p> <ul style="list-style-type: none"> • A non-disclosure agreement covering the RFC documents. • Specifics of the standard or other subject document. • Type of feedback requested and structure for feedback submission: <ul style="list-style-type: none"> – Open or targeted feedback – Options for participants to categorize their feedback, which typically include: <ul style="list-style-type: none"> ♦ Request for additional guidance ♦ Request for clarification ♦ Request for new/updated requirement. • Any unique information about the RFC or subject document that the RFC audience should be aware of.

Process Steps	Details
4. PCI SSC opens the RFC.	<ul style="list-style-type: none"> • RFC is open for at least the time defined in Table 1 in this PCI SSC RFC Process Guide. • RFC participants review RFC instructions and “Read Me First” document prior to reviewing RFC document(s). • RFC participants utilize the PCI SSC portal to sign the non-disclosure agreement, download the RFC document(s), and submit RFC comments. • PCI SSC will only accept feedback submitted via the PCI SSC portal. • RFC participants receive reminder notices via e-mail during RFC period.
5. PCI SSC closes the RFC.	<ul style="list-style-type: none"> • The RFC is closed at the time and date specified in the RFC materials. • PCI SSC will not accept feedback after the RFC period is completed.
6. PCI SSC reviews feedback and records the final action taken for all feedback items.	<p>PCI SSC and the applicable Working Group reviews all feedback items and records actions taken.</p> <p>Example actions taken:</p> <ul style="list-style-type: none"> • Addressed in whole or in part • Future consideration • Acknowledged – no change requested • Acknowledged – already addressed • Not adopted – does not align with goals of standard • Not adopted – compliance, regulatory, or non-PCI issues • Not adopted – feedback unclear.
7. PCI SSC finalizes document updates.	Subject document is updated to address feedback received.

Process Steps	Details
<p>8. PCI SSC prepares and posts the RFC feedback summary document.</p>	<p>The feedback summary document will include at least the following information:</p> <ul style="list-style-type: none"> • Summary of feedback categories received (e.g., via charts or graphs) • Explanations of PCI SSC actions taken (e.g., more details about each type of action) • List of companies that provided feedback • A full summary of all feedback provided, including: <ul style="list-style-type: none"> – Company that provided the feedback – Company profile (e.g., merchant, vendor, financial institution) – Related sections of subject PCI SSC document – Actual feedback received, including comments and suggested solutions <p>Note: PCI SSC will redact feedback if deemed appropriate to avoid propagation of security flaws or risks, or to protect proprietary information or privacy.</p> <ul style="list-style-type: none"> – PCI SSC feedback category – PCI SSC actions taken for each item <p>Note: If more than one RFC is held for a given standard revision, the feedback summary document will be provided to all those who participated in that RFC or other RFCs for that document revision.</p>

Exceptions to PCI SSC RFC Process

This exception process will be followed whenever a PCI SSC Working Group or Committee determines it is necessary to deviate from the *PCI SSC RFC Process Guide*. Examples of exceptions may include:

- Submitting a document for RFC that is not included in Table 1 of this document.
- Submitting an RFC to a different audience than defined in Table 1 of this document.
- Submitting a different number of RFCs than defined in Table 1 of this document.
- Setting an RFC duration that is less than the minimum defined in Table 1 of this document.
- Providing notice before starting an RFC that is less than the minimum notice defined in Table 3 of this document.

Table 4: PCI SSC RFC Exception Process

Process Step	Details
PCI SSC working group or other PCI SSC committee determines it is necessary to vary from this <i>PCI SSC RFC Process Guide</i> .	<ul style="list-style-type: none"> • Working group/committee summarizes details and justification for proposed variance. • Approval is required by the PCI SSC Management Committee, with notice sent to the Executive Committee.