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ACME Integrations
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Abstract

This document outlines multiple advanced use cases and integrations that ACME facilitates without any modifications or enhancements required to the base ACME specification. The use cases include ACME integration with EST, BRSKI and TEAP.

Status of This Memo

This Internet-Draft will expire on September 10, 2021.

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1. Introduction

ACME [RFC8555] defines a protocol that a certificate authority (CA) and an applicant can use to automate the process of domain name ownership validation and X.509 (PKIX) certificate issuance. The protocol is rich and flexible and enables multiple use cases that are not immediately obvious from reading the specification. This document explicitly outlines multiple advanced ACME use cases including:

- ACME integration with EST [RFC7030]

- ACME integration with BRSKI [I-D.ietf-anima-bootstrapping-keyinfra]

- ACME integration with BRSKI Default Cloud Registrar [I-D.friel-anima-brski-cloud]

- ACME integration with TEAP [RFC7170] and TEAP Update and Extensions for Bootstrapping [I-D.lear-eap-teap-brski]

The integrations with EST, BRSKI (which is based upon EST), and TEAP enable automated certificate enrolment for devices.

ACME for subdomains [I-D.friel-acme-subdomains] outlines how ACME can be used by a client to obtain a certificate for a subdomain identifier from a certificate authority where the client has fulfilled a challenge against a parent domain, but does not need to fulfil a challenge against the explicit subdomain. This is a useful optimization when ACME is used to issue certificates for large

numbers of devices as it reduces the domain ownership proof traffic (DNS or HTTP) and ACME traffic overhead, but is not a necessary requirement.

2. Terminology

The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "NOT RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in BCP 14 [RFC2119] [RFC8174] when, and only when, they appear in all capitals, as shown here.

The following terms are used in this document:

- BRSKI: Bootstrapping Remote Secure Key Infrastructures [I-D.ietf-anima-bootstrapping-keyinfra]

- CA: Certificate Authority

- CMC: Certificate Management over CMS

- CSR: Certificate Signing Request

- EST: Enrollment over Secure Transport [RFC7030]

- FQDN: Fully Qualified Domain Name

- RA: PKI Registration Authority

- TEAP: Tunneled Extensible Authentication Protocol [RFC7170]

3. ACME Integration with EST

EST [RFC7030] defines a mechanism for clients to enroll with a PKI Registration Authority by sending CMC messages over HTTP. EST section 1 states:

"Architecturally, the EST service is located between a Certification Authority (CA) and a client. It performs several functions traditionally allocated to the Registration Authority (RA) role in a PKI."

EST section 1.1 states that:

"For certificate issuing services, the EST CA is reached through the EST server; the CA could be logically "behind" the EST server or embedded within it."

When the CA is logically "behind" the EST RA, EST does not specify how the RA communicates with the CA. EST section 1 states:

"The nature of communication between an EST server and a CA is not described in this document."

This section outlines how ACME could be used for communication between the EST RA and the CA. The example call flow leverages [I-D.friel-acme-subdomains] and shows the RA proving ownership of a parent domain, with individual client certificates being subdomains under that parent domain. This is an optimization that reduces DNS and ACME traffic overhead. The RA could of course prove ownership of every explicit client certificate identifier.

The call flow illustrates the client calling the EST /csrattrs API before calling the EST /simpleenroll API. This enables the EST server to indicate to the client what attributes it expects the client to include in the CSR request sent in the /simpleenroll API. For example, EST servers could use this mechanism to tell the client what fields to include in the CSR Subject and Subject Alternative Name fields.

The call flow illustrates the EST RA returning a 202 Retry-After response to the client's simpleenroll request. This is an optional step and may be necessary if the interactions between the RA and the ACME server take some time to complete. The exact details of when the RA returns a 202 Retry-After are implementation specific.

```
   +--------+             +--------+             +------+     +-----+
   | Pledge |             | EST RA |             | ACME |     | DNS |
   +--------+             +--------+             +------+     +-----+
       |                      |                      |           |
                  STEP 1: Pre-Authorization of parent domain
       |                      |                      |           |
       |                      | POST /newAuthz       |           |
       |                      |  "example.com"       |           |
       |                      |--------------------->|           |
       |                      |                      |           |
       |                      | 201 authorizations   |           |
       |                      |<---------------------|           |
       |                      |                      |           |
       |                      | Publish DNS TXT      |           |
       |                      | "example.com"        |           |
       |                      |--------------------------------->|
       |                      |                      |           |
       |                      | POST /challenge      |           |
       |                      |--------------------->|           |
       |                      |                      | Verify    |
```

```
       |                      |                      |---------->|
       |                      | 200 status=valid     |           |
       |                      |<---------------------|           |
       |                      |                      |           |
       |                      | Delete DNS TXT       |           |
       |                      | "example.com"        |           |
       |                      |--------------------------------->|
       |                      |                      |           |
                  STEP 2: Pledge enrolls against RA
       |                      |                      |           |
       | GET /csrattrs        |                      |           |
       |--------------------->|                      |           |
       |                      |                      |           |
       | 200 OK               |                      |           |
       | SEQUENCE {AttrOrOID} |                      |           |
       | SAN OID:             |                      |           |
       | "pledge.example.com" |                      |           |
       |<---------------------|                      |           |
       |                      |                      |           |
       | POST /simpleenroll   |                      |           |
       | PCSK#10 CSR          |                      |           |
       | "pledge.example.com" |                      |           |
       |--------------------->|                      |           |
       |                      |                      |           |
       | 202 Retry-After      |                      |           |
       |<---------------------|                      |           |
       |                      |                      |           |
                  STEP 3: RA places ACME order
       |                      |                      |           |
       |                      | POST /newOrder       |           |
       |                      | "pledge.example.com" |           |
       |                      |--------------------->|           |
       |                      |                      |           |
       |                      | 201 status=ready     |           |
       |                      |<---------------------|           |
       |                      |                      |           |
       |                      | POST /finalize       |           |
       |                      | PKCS#10 CSR          |           |
       |                      | "pledge.example.com" |           |
       |                      |--------------------->|           |
       |                      |                      |           |
       |                      | 200 OK status=valid  |           |
       |                      |<---------------------|           |
       |                      |                      |           |
       |                      | POST /certificate    |           |
       |                      |--------------------->|           |
       |                      |                      |           |
       |                      | 200 OK               |           |
```

```
       |                      | PEM                  |           |
       |                      | "pledge.example.com" |           |
       |                      |<---------------------|           |
       |                      |                      |           |
                  STEP 4: Pledge retries enroll
       |                      |                      |           |
       | POST /simpleenroll   |                      |           |
       | PCSK#10 CSR          |                      |           |
       | "pledge.example.com" |                      |           |
       |--------------------->|                      |           |
       |                      |                      |           |
       | 200 OK               |                      |           |
       | PKCS#7               |                      |           |
       | "pledge.example.com" |                      |           |
       |<---------------------|                      |           |
```

4. ACME Integration with BRSKI

BRSKI [I-D.ietf-anima-bootstrapping-keyinfra] is based upon EST [RFC7030] and defines how to autonomically bootstrap PKI trust anchors into devices via means of signed vouchers. EST certificate enrollment may then optionally take place after trust has been established. BRKSI voucher exchange and trust establishment are based on EST extensions and the certificate enrollment part of BRSKI is fully based on EST. Similar to EST, BRSKI does not define how the EST RA communicates with the CA. Therefore, the mechanisms outlined in the previous section for using ACME as the communications protocol between the EST RA and the CA are equally applicable to BRSKI.

Note that BRSKI mandates that the id-kp-cmcRA extended key usage bit is set in the Registrar (or EST RA) end entity certificate that the Registrar uses when signing voucher request messages sent to the MASA. Public ACME servers may not be willing to issue end entity certificates that have the id-kp-cmcRA extended key usage bit set. In these scenarios, the EST RA may be used by the pledge to get issued certificates by a public ACME server, but the EST RA itself will need an end entity certificate that has been issued by a CA (e.g. an operator deployed private CA) and that has the id-kp-cmcRA bit set.

The following call flow shows how ACME may be integrated into a full BRSKI voucher plus EST enrollment workflow. For brevity, it assumes that the EST RA has previously proven ownership of a parent domain and that pledge certificate identifiers are a subdomain of that parent domain. The domain ownership exchanges between the RA, ACME and DNS are not shown. Similarly, not all BRSKI interactions are shown and only the key protocol flows involving voucher exchange and EST enrollment are shown.

Similar to the EST section above, the client calls EST /csrattrs API before calling the EST /simpleenroll API. This enables the server to indicate what fields the pledge should include in the CSR that the client sends in the /simpleenroll API.

The call flow illustrates the RA returning a 202 Retry-After response to the initial EST /simpleenroll API. This may be appropriate if processing of the /simpleenroll request and ACME interactions takes some timme to complete.

```
   +--------+             +--------+             +------+     +------+
   | Pledge |             | EST RA |             | ACME |     | MASA |
   +--------+             +--------+             +------+     +------+
       |                      |                      |           |
                  NOTE: Pre-Authorization of "example.com" is complete
       |                      |                      |           |
                  STEP 1: Pledge requests Voucher
       |                      |                      |           |
       | POST /requestvoucher |                      |           |
       |--------------------->|                      |           |
       |                      | POST /requestvoucher |           |
       |                      |---------------------------------->|
       |                      |                      |           |
       |                      | 200 OK Voucher       |           |
       |                      |<----------------------------------|
       | 200 OK Voucher       |                      |           |
       |<---------------------|                      |           |
       |                      |                      |           |
                  STEP 2: Pledge enrolls against RA
       |                      |                      |           |
       | GET /csrattrs        |                      |           |
       |--------------------->|                      |           |
       |                      |                      |           |
       | 200 OK               |                      |           |
       | SEQUENCE {AttrOrOID} |                      |           |
       | SAN OID:             |                      |           |
       | "pledge.example.com" |                      |           |
       |<---------------------|                      |           |
       |                      |                      |           |
       | POST /simpleenroll   |                      |           |
       | PCSK#10 CSR          |                      |           |
       | "pledge.example.com" |                      |           |
       |--------------------->|                      |           |
       |                      |                      |           |
       | 202 Retry-After      |                      |           |
       |<---------------------|                      |           |
       |                      |                      |           |
                  STEP 3: RA places ACME order
```

```
       |                      |                      |           |
       |                      | POST /newOrder       |           |
       |                      | "pledge.example.com" |           |
       |                      |--------------------->|           |
       |                      |                      |           |
       |                      | 201 status=ready     |           |
       |                      |<---------------------|           |
       |                      |                      |           |
       |                      | POST /finalize       |           |
       |                      | PKCS#10 CSR          |           |
       |                      | "pledge.example.com" |           |
       |                      |--------------------->|           |
       |                      |                      |           |
       |                      | 200 OK status=valid  |           |
       |                      |<---------------------|           |
       |                      |                      |           |
       |                      | POST /certificate    |           |
       |                      |--------------------->|           |
       |                      |                      |           |
       |                      | 200 OK               |           |
       |                      | PEM                  |           |
       |                      | "pledge.example.com" |           |
       |                      |<---------------------|           |
       |                      |                      |           |
                  STEP 4: Pledge retries enroll
       |                      |                      |           |
       | POST /simpleenroll   |                      |           |
       | PCSK#10 CSR          |                      |           |
       | "pledge.example.com" |                      |           |
       |--------------------->|                      |           |
       |                      |                      |           |
       | 200 OK               |                      |           |
       | PKCS#7               |                      |           |
       | "pledge.example.com" |                      |           |
       |<---------------------|                      |           |
```

5. ACME Integration with BRSKI Default Cloud Registrar

BRSKI Cloud Registrar [I-D.friel-anima-brski-cloud] specifies the behaviour of a BRSKI Cloud Registrar, and how a pledge can interact with a BRSKI Cloud Registrar when bootstrapping. Similar to the local domain registrar BRSKI flow, ACME can be easily integrated with a cloud registrar bootstrap flow.

BRSKI cloud registrar is flexible and allows for multiple different local domain discovery and redirect scenarios. In the example illustrated here, the extension to [RFC8366] Vouchers which is defined in [I-D.friel-anima-brski-cloud], and allows the

specification of a bootstrap EST domain, is leveraged. This extension allows the cloud registrar to specify the local domain RA that the pledge should connect to for the purposes of EST enrollment.

Similar to the sectiosn above, the client calls EST /csrattrs API before calling the EST /simpleenroll API.

```
  +--------+             +--------+            +------+     +----------+
  | Pledge |             | EST RA |            | ACME |     | Cloud RA |
  +--------+             +--------+            +------+     |  / MASA  |
      |                                                     +----------+
      |                                                         |
           NOTE: Pre-Authorization of "example.com" is complete
      |                                                         |
           STEP 1: Pledge requests Voucher from Cloud Registrar
      |                                                         |
      | POST /requestvoucher                                    |
      |-------------------------------------------------------->|
      |                                                         |
      | 200 OK Voucher (includes 'est-domain')                  |
      |<--------------------------------------------------------|
      |                      |                      |           |
           STEP 2: Pledge enrolls against local domain RA
      |                      |                      |           |
      | GET /csrattrs        |                      |           |
      |--------------------->|                      |           |
      |                      |                      |           |
      | 200 OK               |                      |           |
      | SEQUENCE {AttrOrOID} |                      |           |
      | SAN OID:             |                      |           |
      | "pledge.example.com" |                      |           |
      |<---------------------|                      |           |
      |                      |                      |           |
      | POST /simpleenroll   |                      |           |
      | PCSK#10 CSR          |                      |           |
      | "pledge.example.com" |                      |           |
      |--------------------->|                      |           |
      |                      |                      |           |
      | 202 Retry-After      |                      |           |
      |<---------------------|                      |           |
      |                      |                      |           |
           STEP 3: RA places ACME order
      |                      |                      |           |
      |                      | POST /newOrder       |           |
      |                      | "pledge.example.com" |           |
      |                      |--------------------->|           |
      |                      |                      |           |
      |                      | 201 status=ready     |           |
```

```
      |                      |<---------------------|           |
      |                      |                      |           |
      |                      | POST /finalize       |           |
      |                      | PKCS#10 CSR          |           |
      |                      | "pledge.example.com" |           |
      |                      |--------------------->|           |
      |                      |                      |           |
      |                      | 200 OK status=valid  |           |
      |                      |<---------------------|           |
      |                      |                      |           |
      |                      | POST /certificate    |           |
      |                      |--------------------->|           |
      |                      |                      |           |
      |                      | 200 OK               |           |
      |                      | PEM                  |           |
      |                      | "pledge.example.com" |           |
      |                      |<---------------------|           |
      |                      |                      |           |
           STEP 4: Pledge retries enroll
      |                      |                      |           |
      | POST /simpleenroll   |                      |           |
      | PCSK#10 CSR          |                      |           |
      | "pledge.example.com" |                      |           |
      |--------------------->|                      |           |
      |                      |                      |           |
      | 200 OK               |                      |           |
      | PKCS#7               |                      |           |
      | "pledge.example.com" |                      |           |
      |<---------------------|                      |           |
```

6. ACME Integration with TEAP

TEAP [RFC7170] defines a tunnel-based EAP method that enables secure communication between a peer and a server by using TLS to establish a mutually authenticated tunnel. TEAP enables certificate provisioning within the tunnel. TEAP Update and Extensions for Bootstrapping [I-D.lear-eap-teap-brski] defines extensions to TEAP that includes additional TLVs for certificate enrollment and BRSKI handling inside the TEAP tunnel. Neither TEAP [RFC7170] or TEAP Update and Extensions for Bootstrapping [I-D.lear-eap-teap-brski] define how the TEAP server communicates with the CA.

This section outlines how ACME could be used for communication between the TEAP server and the CA. The example call flow leverages [I-D.friel-acme-subdomains] and shows the TEAP server proving ownership of a parent domain, with individual client certificates being subdomains under that parent domain.

The example illustrates the TEAP server sending a Request-Action TLV including a CSR-Attributes TLV instructing the peer to send a CSR-Attributes TLV to the server. This enables the server to indicate what fields the peer should include in the CSR that the peer sends in the PKCS#10 TLV. For example, the TEAP server could instruct the peer what Subject or SAN entries to include in its CSR.

Althought not explicitly illustrated in this call flow, the Peer and TEAP Server could exchange BRSKI TLVs, and a BRSKI integration and voucher exchange with a MASA server could take place over TEAP. Whether a BRSKI TLV exchange takes place or not does not impact the ACME specific message exchanges.

```
  +------+                +-------------+           +------+     +-----+
  | Peer |                | TEAP-Server |           | ACME |     | DNS |
  +------+                +-------------+           +------+     +-----+
      |                         |                      |           |
                 STEP 1: Pre-Authorization of parent domain
      |                         |                      |           |
      |                         | POST /newAuthz       |           |
      |                         |  "example.com"       |           |
      |                         |--------------------->|           |
      |                         |                      |           |
      |                         | 201 authorizations   |           |
      |                         |<---------------------|           |
      |                         |                      |           |
      |                         | Publish DNS TXT      |           |
      |                         | "example.com"        |           |
      |                         |--------------------------------->|
      |                         |                      |           |
      |                         | POST /challenge      |           |
      |                         |--------------------->|           |
      |                         |                      | Verify    |
      |                         |                      |---------->|
      |                         | 200 status=valid     |           |
      |                         |<---------------------|           |
      |                         |                      |           |
      |                         | Delete DNS TXT       |           |
      |                         | "example.com"        |           |
      |                         |--------------------------------->|
      |                         |                      |           |
      |                         |                      |           |
                 STEP 2: Establsh EAP Outer Tunnel
      |                         |                      |           |
      |  EAP-Request/           |                      |           |
      |   Type=Identity         |                      |           |
      |<------------------------|                      |           |
      |                         |                      |           |
```

```
      |  EAP-Response/          |                      |           |
      |   Type=Identity         |                      |           |
      |------------------------>|                      |           |
      |                         |                      |           |
      |  EAP-Request/           |                      |           |
      |   Type=TEAP,            |                      |           |
      |   TEAP Start,           |                      |           |
      |   Authority-ID TLV      |                      |           |
      |<------------------------|                      |           |
      |                         |                      |           |
      |  EAP-Response/          |                      |           |
      |   Type=TEAP,            |                      |           |
      |   TLS(ClientHello)      |                      |           |
      |------------------------>|                      |           |
      |                         |                      |           |
      |  EAP-Request/           |                      |           |
      |   Type=TEAP,            |                      |           |
      |   TLS(ServerHello,      |                      |           |
      |   Certificate,          |                      |           |
      |   ServerKeyExchange,    |                      |           |
      |   CertificateRequest,   |                      |           |
      |   ServerHelloDone)      |                      |           |
      |<------------------------|                      |           |
      |                         |                      |           |
      |  EAP-Response/          |                      |           |
      |   Type=TEAP,            |                      |           |
      |   TLS(Certificate,      |                      |           |
      |   ClientKeyExchange,    |                      |           |
      |   CertificateVerify,    |                      |           |
      |   ChangeCipherSpec,     |                      |           |
      |   Finished)             |                      |           |
      |------------------------>|                      |           |
      |                         |                      |           |
      |  EAP-Request/           |                      |           |
      |   Type=TEAP,            |                      |           |
      |   TLS(ChangeCipherSpec, |                      |           |
      |   Finished),            |                      |           |
      |   {Crypto-Binding TLV,  |                      |           |
      |   Result TLV=Success}   |                      |           |
      |<------------------------|                      |           |
      |                         |                      |           |
      |  EAP-Response/          |                      |           |
      |   Type=TEAP,            |                      |           |
      |   {Crypto-Binding TLV,  |                      |           |
      |   Result TLV=Success}   |                      |           |
      |------------------------>|                      |           |
      |                         |                      |           |
      |  EAP-Request/           |                      |           |
```

```
      |   Type=TEAP,            |                      |           |
      |   {Request-Action TLV:  |                      |           |
      |     Status=Failure,     |                      |           |
      |     Action=Process-TLV, |                      |           |
      |     TLV=CSR-Attributes, |                      |           |
      |     TLV=PKCS#10}        |                      |           |
      |<------------------------|                      |           |
      |                         |                      |           |
                 STEP 3: Enroll for certificate
      |                         |                      |           |
      |  EAP-Response/          |                      |           |
      |   Type=TEAP,            |                      |           |
      |   {CSR-Attributes TLV}  |                      |           |
      |------------------------>|                      |           |
      |                         |                      |           |
      |  EAP-Request/           |                      |           |
      |   Type=TEAP,            |                      |           |
      |   {CSR-Attributes TLV}  |                      |           |
      |<------------------------|                      |           |
      |                         |                      |           |
      |  EAP-Response/          |                      |           |
      |   Type=TEAP,            |                      |           |
      |   {PKCS#10 TLV:         |                      |           |
      |   "pledge.example.com"} |                      |           |
      |------------------------>|                      |           |
      |                         | POST /newOrder       |           |
      |                         | "pledge.example.com" |           |
      |                         |--------------------->|           |
      |                         |                      |           |
      |                         | 201 status=ready     |           |
      |                         |<---------------------|           |
      |                         |                      |           |
      |                         | POST /finalize       |           |
      |                         | PKCS#10 CSR          |           |
      |                         | "pledge.example.com" |           |
      |                         |--------------------->|           |
      |                         |                      |           |
      |                         | 200 OK status=valid  |           |
      |                         |<---------------------|           |
      |                         |                      |           |
      |                         | POST /certificate    |           |
      |                         |--------------------->|           |
      |                         |                      |           |
      |                         | 200 OK               |           |
      |                         | PEM                  |           |
      |                         | "pledge.example.com" |           |
      |                         |<---------------------|           |
      |                         |                      |           |
```

```
      |  EAP-Request/           |                      |           |
      |   Type=TEAP,            |                      |           |
      |   {PKCS#7 TLV,          |                      |           |
      |    Result TLV=Success}  |                      |           |
      |<------------------------|                      |           |
      |                         |                      |           |
      |  EAP-Response/          |                      |           |
      |   Type=TEAP,            |                      |           |
      |   {Result TLV=Success}  |                      |           |
      |------------------------>|                      |           |
      |                         |                      |           |
      |  EAP-Success            |                      |           |
      |<------------------------|                      |           |
```

7. IANA Considerations

This document does not make any requests to IANA.

8. Security Considerations

This draft is informational and makes no changes to the referenced specifications. All security considerations from these referenced documents are applicable here:

- EST [RFC7030]

- BRSKI [I-D.ietf-anima-bootstrapping-keyinfra]

- BRSKI Default Cloud Registrar [I-D.friel-anima-brski-cloud]

- TEAP [RFC7170] and TEAP Update and Extensions for Bootstrapping [I-D.lear-eap-teap-brski]

Additionally, all Security Considerations in ACME in the following areas are equally applicable to ACME Integrations.

The integration mechanisms proposed here will primarily use the DNS-01 challenge documented in [RFC8555] section 8.4. The security considerations in RFC8555 says:

The DNS is a common point of vulnerability for all of these challenges. An entity that can provision false DNS records for a domain can attack the DNS challenge directly and can provision false A/AAAA records to direct the ACME server to send its HTTP validation query to a remote server of the attacker's choosing.

It is expected that the TEAP-EAP server/EST Registrar will perform DNS dynamic updates to a DNS primary server using [RFC3007] Dynamic updates, secured with with either SIG(0), or TSIG keys.

A major source of vulnerability is the disclosure of these DNS key records. An attacker that has access to them, can provision their own certificates into the the name space of the entity.

For many uses, this may allow the attacker to get access to some enterprise resource. When used to provision, for instance, a (SIP) phone system this would permit an attacker to impersonate a legitimate phone. Not only does this allow for redirection of phone calls, but possibly also toll fraud.

Operators should consider restricting the integration server such that it can only update the DNS records for a specific zone or zones where ACME is required for client certificate enrolment automation. For example, if all IoT devices in an organisation enrol using EST against an EST RA, and all IoT devices will be issued certificates in a subdomain under iot.example.com, then the integration server could be issued a credential that only allows updating of DNS records in a zone that includes domains in the iot.example.com namespace, but does not allow updating of DNS records under any other example.com DNS namespace.

When performing challenge fulfilment via writing files to HTTP webservers, write access should only be granted to a specific set of servers, and only to a specific set of directories for storage of challenge files.

8.1. Denial of Service against ACME infrastructure

The intermdiate node (the TEAP-EAP server, or the EST Registrar) should cache the resulting certificates such that if the communication with the pledge is lost, subsequent attempts to enroll will result in the cache certificate being returned.

As many ACME servers have per-day, per-IP and per-subjectAltName limits, it is prudent not to request identical certificates too often. This could be due to operator or installer error, with multiple configuration resets occuring within a short period of time.

The cache should be keyed by the complete contents of the Certificate Signing Request, and should not persist beyond the notAfter date in the certificate.

This means that if the private/public keypair changes on the pledge, then a new certificate will be issued. If the the requested SubjectAltName changes, then a new certificate will be requested.

In a case where a device is simply factory reset, and enrolls again, then the same certificate can be returned.

9. Informative References

[I-D.friel-acme-subdomains]
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