

Network and Certificate System Security Requirements

Version ~~1.7~~2.0



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DRAFT

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Introduction

Overview

Scope and Applicability:

~~These Network and Certificate System Security Requirements (Requirements) apply to all publicly trusted Certification Authorities (CAs) and are adopted with the intent that all such CAs and Delegated Third Parties be audited for conformity with these Requirements as soon as they have been incorporated as mandatory requirements (if not already mandatory requirements) in the root embedding program for any major Internet browsing client and that they be incorporated into the WebTrust Service Principles and Criteria for Certification Authorities, ETSI TS 101 456, ETSI TS 102 042 and ETSI EN 319 411-1 including revisions and implementations thereof, including any audit scheme that purports to determine conformity therewith.~~

In these Requirements, the CA is responsible for all tasks performed by Delegated Third Parties and Trusted Roles, and the CA SHALL define, document, and disclose to its auditors:

- a. the tasks assigned to Delegated Third Parties or Trusted Roles, ~~and~~;
- b. the arrangements made with Delegated Third ~~parties~~ Parties to ensure compliance with these Requirements, ~~;~~ and
- c. the relevant practices, procedures, and/or systems implemented by Delegated Third Parties.

Guiding Principle and Goal:

CAs are expected to maintain a very high level of security for their infrastructure and systems because the certificates they issue play a vital role in the security of the internet, email, and software distribution.

Desired Outcomes:

The following are outcomes that this document seeks to achieve:

- CAs are able to clearly understand the minimum security requirements found in this document and successfully adapt/implement these Requirements to their own infrastructure and architecture.
- Audit and assessment bodies are able to accurately map these Requirements to the specific implementations observed during audit engagements, and judge compliance against these Requirements.
- CA organizations, operations, infrastructure, and CA Private Keys and certificates are not compromised.
- Controls are implemented that protect against external and internal threats, including mistakes.
- Through a combination of credentialing, role management, and training, CA personnel are limited in their ability to negatively impact the CA's operations, whether intentionally or unintentionally.

- [Systems provide sufficient artifacts to enable traceability of all events and identification and investigation of anomalous events.](#)
- [Continuous monitoring and testing are conducted to identify any vulnerabilities or weaknesses that need to be addressed promptly and to ensure the effectiveness of implemented security controls.](#)
- [CA Infrastructure is maintained, including timely patching of software and firmware, and hardware is kept sufficiently up to date to support software and systems running on it.](#)
- [A framework is provided for assessment of infrastructure and systems not directly owned or controlled by the CA.](#)
- [The use of infrastructure or systems not owned or controlled by the CA is possible, if such use aligns with these Requirements and all other applicable standards, policies, or requirements.](#)

Document History

Ver.	Ballot	Description	Adopted	Effective*
1.0	83	Original Version Adopted	3-Aug-12	01-Jan-13
1.1	210	Misc. Changes to NCSSRs	31-Aug-17	09-Mar-18
1.2	SC3	Two-Factor Authentication and Password Improvements	16-Aug-18	15-Sep-18
1.3	SC21	The Network and Certificate Systems Security Requirements Section 3 (Log Integrity Controls)	26-Sep-19	4-Nov-2019
1.4	SC29	System Configuration Management	7-May-20	8-Jun-2020
1.5	SC28	Logging and Log Retention	10-Sep-2020	19-Sep-2020
1.6	SC39	Definition of Critical Vulnerability	16-Feb-2021	30-Mar-2021
1.7	SC41	Reformatting the BRs, EVGs, and NCSSRs	24-Feb-2021	5-Apr-2021
<u>2.0</u>	<u>NS-003</u>	<u>Restructure NCSSRs</u>	<u>06-May-2024</u>	<u>05-Jun-2024</u>

* Effective Date based on completion of 30-day IPR review without filing of any Exclusion Notices.

Definitions

[**Air-Gapped:** Physically and logically separated, disconnected, and isolated from all other Systems.](#)

[**CA Infrastructure:** Collectively the infrastructure used by the CA or Delegated Third](#)

Party which qualifies as a:

- Certificate Management System;
- Certificate System;
- Delegated Third Party System;
- Issuing System;
- Root CA System (Air-Gapped and otherwise); or
- Security Support System.

Certificate Management System: A system used by a CA or Delegated Third Party to process, approve issuance of, or store certificates or certificate status information, including the database, database server, and storage.

Certificate Systems System: ~~The A system used by a CA or Delegated Third Party in providing identity verification, registration and enrollment, certificate approval, issuance, validity status, support, and other PKI-related services. to access, process, or manage data or provide services related to:~~

1. identity validation;
2. identity authentication;
3. account registration;
4. certificate application;
5. certificate approval;
6. certificate issuance;
7. certificate revocation;
8. authoritative certificate status; or
9. key escrow.

Common Vulnerability Scoring System (CVSS): A quantitative model used to measure the base level severity of a vulnerability (see <http://nvd.nist.gov/vuln-metrics/cvss>).

Critical Security Event: ~~Detection of an event, a An event,~~ set of circumstances, or anomalous activity that could lead to a circumvention of ~~a Zone's CA Infrastructure security controls or a compromise of a Certificate System's integrity, including compromise of CA Infrastructure integrity or operational continuity, including, but not limited to,~~ excessive login attempts, attempts to access prohibited resources, DoS/DDoS attacks, attacker reconnaissance, excessive traffic at unusual hours, signs of unauthorized access, system intrusion, or ~~an actual physical~~ compromise of component integrity.

Critical Vulnerability: A system vulnerability that has a CVSS v2.0 score of 7.0 or higher according to the NVD or an equivalent to such CVSS rating (see <https://nvd.nist.gov/vuln-metrics/cvss>), or as otherwise designated as a Critical Vulnerability by the CA or the CA/Browser Forum.

Delegated Third Party: A natural person or legal entity that is not the CA and that operates any part of a Certificate System.

Delegated Third Party System: Any part of a Certificate System used by a Delegated

Third Party while performing the functions delegated to it by the CA.

Front End / Internal Support System: ~~A system with a public IP address, including a web server, mail server, DNS server, jump host, or authentication server.~~

High Security Zone: ~~A physical location where a CA's or Delegated Third Party's Private Key or cryptographic hardware is located.~~

Issuing System: A system used to sign certificates or validity status information.

Key Pair: The Private Key and its associated Public Key.

Multi-Factor Authentication: An authentication mechanism consisting of two or more of the following independent categories of credentials (i.e. factors) to verify the user's identity for a login or other transaction: ~~something you know~~

1. something the user knows (knowledge factor), ~~something you have~~;
2. something the user has (possession factor), ~~and something you are~~; and
3. something the user is (inherence factor). Each factor ~~must be independent~~.
~~Certificate-based authentication can be used as part of Multifactor Authentication only if the private key is stored in a Secure Key Storage Device. is independent of the other(s).~~

Multi-Party Control: An access control mechanism which requires two or more separate, authorized users to successfully authenticate with their own unique credentials prior to access being granted.

National Vulnerability Database (NVD): A database that includes the Common Vulnerability Scoring System (CVSS) scores of security-related software flaws, misconfigurations, and vulnerabilities associated with systems (see <http://nvd.nist.gov/>).

Network Equipment: Hardware devices and components that facilitate communication and data transfer within the CA Infrastructure.

OWASP Top Ten: A list of application vulnerabilities published by the Open Web Application Security Project (see https://www.owasp.org/index.php/Category:OWASP_Top_Ten_Project).

Penetration Test: A process that identifies and attempts to exploit openings and vulnerabilities on systems through the active use of known attack techniques, including the combination of different types of exploits, with a goal of breaking through layers of defenses and reporting on unpatched vulnerabilities and system weaknesses.

Root CA System**Physically Secure Environment:** A ~~system~~ controlled and protected physical space consisting minimally of a physical environment which is:

1. protected by security controls which address the topics outlined in section 4.5.1 of RFC 3647; and
2. designed, built, and maintained in accordance with Risk Assessments conducted by the CA.

Principle of Least Privilege: The principle that users, devices, and software should only have the minimum necessary access and privileges to complete their functions.

Private Key: The cryptographic key of an asymmetric Key Pair that is kept secret by the holder of the Key Pair. It may be used to create ~~a Root Certificate or to generate, store, or sign with the Private Key~~ digital signatures and/or to decrypt data that were encrypted by the corresponding Public Key.

Public Key: The cryptographic key of an asymmetric Key Pair that can be made public without compromising the security of the Key Pair. It may be used to verify digital signatures and/or to encrypt data that can be decrypted by the corresponding Private Key.

Requirements: The Network and Certificate System Security Requirements found in this document.

Risk Assessment: A formal process that:

1. Identifies and documents foreseeable internal and external threats to the CA Infrastructure that could result in:
 - unauthorized access to the CA Infrastructure;
 - disclosure of data stored in the CA Infrastructure;
 - misuse of the CA Infrastructure; or
 - unapproved alteration or destruction of any part of the CA Infrastructure;
2. Assesses and documents the likelihood and potential damage of each identified threat, taking into consideration minimally the sensitivity and criticality of the CA Infrastructure; and
3. Assesses and documents the sufficiency of the policies, procedures, controls, information systems, technology, and other arrangements that the CA has in place to counter each identified threat.

Root CA Certificate: A self-signed and self-issued certificate where:

1. the issuer and subject of the certificate are the same; and
2. the digital signature of the certificate is:
 - generated using the Private Key of a Key Pair whose corresponding Public Key is bound to the certificate; and
 - verified using the Public Key contained in the certificate.

Root CA Private Key: The Private Key associated with a Root CA Certificate.

Root CA System: A system used to:

1. generate a Key Pair whose Private Key is or will be a Root CA Private Key;
2. store a Root CA Private Key; or
3. create digital signatures using a Root CA Private Key.

SANS Top 25: A list created with input from the SANS SysAdmin, Audit, Network, and Security (SANS) Institute and the Common Weakness Enumeration (CWE) that identifies

the Top 25 Most Dangerous Software Errors that lead to exploitable vulnerabilities (see <http://www.sans.org/top25-software-errors/>).

Secure Key Storage Device: A device certified as meeting at least FIPS 140-2 level 2 overall, level 3 physical, or Common Criteria (EAL 4+).

Secure Zone: An area (physical or logical) protected by physical and logical controls that appropriately protect the confidentiality, integrity, and availability of Certificate Systems.

Security Support System: A system used to provide security support functions, which MAY include authentication, or set of systems supporting the security of the CA Infrastructure, which minimally includes:

1. [authentication](#);
2. network boundary control, ~~audit logging~~;
3. [audit logging](#);
4. audit log reduction and analysis, ~~vulnerability scanning, and intrusion detection (Host-based intrusion detection, Network-based intrusion detection)~~;
5. [vulnerability scanning](#);
6. [physical intrusion detection](#);
7. [host-based intrusion detection](#); and
8. [network-based intrusion detection](#).

System: One or more pieces of equipment or software that stores, transforms, or communicates data.

Trusted Role: An employee or contractor of a CA or Delegated Third Party who has authorized access to ~~or control over a Secure Zone or High Security Zone~~ [any component of CA Infrastructure](#).

Vulnerability Scan: A process that uses manual or automated tools to probe internal and external systems to check and report on the status of operating systems, services, and devices exposed to the network and the presence of vulnerabilities listed in the NVD, OWASP Top Ten, or SANS Top 25.

Zone Workstation: A ~~subset of Certificate Systems created by the logical or physical partitioning of systems from other Certificate Systems.~~ [device, such as a phone, tablet, or desktop or laptop computer, which is:](#)

Each CA or Delegated Third Party SHALL:

1. Segment Certificate Systems into [connected to the same network as CA Infrastructure and/or Network Equipment](#); and
2. [capable of accessing CA Infrastructure and/or Network Equipment](#).

Requirements

[Prior to 2024-11-12, the CA SHALL adhere to these Requirements or Version 1.7 of the Network and Certificate System Security Requirements. Effective 2024-11-12, the CA](#)

SHALL adhere to these Requirements.

1. CA Infrastructure and Network Equipment Configuration

1.1 Network Segmentation

1.1.1

CA Infrastructure MUST be segmented into separate networks based on their functional or logical relationship, for example separate physical networks or VLANs; the functional and/or logical relationships of CA Infrastructure components.

1.1.1.1

Network segmentation MUST be designed and implemented using Network Equipment, such as:

- Apply equivalent security controls to all systems co-located in the same network with a Certificate System firewalls
- network switches
- physically separate networks

Network segmentation MAY leverage software, such as:

- virtual LANs (VLANs) and VLAN access control lists
- software-defined networking
- virtual private networks (VPNs)

1.1.1.2

Network segmentation SHOULD be designed and implemented in a manner that:

1. minimizes attack surfaces;
2. Maintain Root CA Systems in a High Security Zone and in an offline state or air-gapped from all other limits lateral movement within networks;
3. Maintain and protect Issuing Systems, Certificate Management Systems, and Security Support Systems in at least a Secure Zone; restricts traffic flow between different network segments; and
4. Implement and configure Security Support Systems that protect systems and communications between systems inside Secure Zones and High Security Zones, and communications with non-Certificate Systems outside those zones (including those with organizational business units that do not provide PKI-related services) and those on public networks; protects all CA Infrastructure components from unauthorized access.

1.2 CA Infrastructure Security

1.2.1

CA Infrastructure MUST be in a Physically Secure Environment.

1.2.2

CA Infrastructure and Network Equipment MUST be implemented and configured to authenticate and encrypt connections:

1. between CA Infrastructure components; and
2. ~~Configure each network boundary control (firewall, switch, router, gateway, or other network control device or system) with rules that support only the~~ between CA Infrastructure and non-CA Infrastructure.

CA Infrastructure and Network Equipment MUST be implemented and configured in a manner that minimizes unnecessary active components and capabilities such that:

1. ~~all connections, communications, applications, services, protocols, ports, and communications that the CA has identified as necessary to its operations;~~
2. ~~Configure Issuing Systems, Certificate Management Systems, Security Support Systems, and Front-End and ports not used are removed and/Internal Support Systems by removing or disabling all accounts, or disabled; and~~
3. ~~only connections, communications, applications, services, protocols, and ports that are not used in the CA's or Delegated Third Party's operations and allowing only those that are approved by the CA or Delegated Third Party; necessary and approved under the Principle of Least Privilege are enabled.~~

1.2.3

Equivalent security MUST be implemented on all Systems on the same network as any CA Infrastructure component.

1.3 Change Management

The CA MUST establish and maintain a change management process which is minimally:

1. ~~Ensure that the CA's security policies encompass a~~ documented comprehensively;
2. authoritative for:
 1. all personnel in Trusted Roles;
 2. management of Network Equipment; and
 3. management of CA Infrastructure;
3. reviewed annually;
4. updated as needed; and
5. approved:
 - with each update;
 - prior to going into effect; and
 - by personnel in applicable Trusted Roles.

The CA MUST ensure the change management process:

1. ~~enables identification, documentation, following the principles of documentation, approval and review, and to~~ remediation of risks associated with introducing,

modifying, or removing:

- Trusted Role definitions;
 - Trusted Role appointments;
 - Network Equipment; or
 - CA Infrastructure;
2. addresses managing exceptions and responding to emergencies; and
 3. incorporates procedures for change reversal where applicable.

The CA MUST ensure that all changes to Certificate Systems, Issuing Systems, Certificate Management Systems, Security Support Systems, and Front End / Internal Support Systems follow said are completed in accordance with such a change management process for:

1. Trusted Role definitions;
2. ~~Grant administration access to Certificate Systems only to persons acting in Trusted Roles and require their accountability for the Certificate System's security~~Trusted Role appointments;
3. ~~Implement Multi-Factor Authentication to each component of the Certificate System that supports Multi-Factor Authentication;~~Network Equipment; and
4. ~~Change authentication keys and passwords for any privileged account or service account on a Certificate System whenever a person's authorization to administratively access that account on the Certificate System is changed or revoked~~CA Infrastructure.

2. Access Control

Within this Section 2, references to "access" include all physical and logical access, unless otherwise specified.

2.1 Trusted roles

The CA MUST define Trusted Roles for the personnel who design, build, develop, implement, operate, and maintain its CA Infrastructure and Network Equipment.

Each Trusted Role MUST have its responsibilities, privileges, and access documented.

Each Trusted Role MUST be assigned responsibilities, privileges, and access in a manner consistent with:

1. the Principle of Least Privilege; and
2. ~~Apply recommended security patches to Certificate Systems within six (6) months of the security patch's availability, unless the CA documents that the security patch would introduce additional vulnerabilities or instabilities that outweigh the benefits of applying the security patch.~~requirements of Multi-Party Control.

2.1.1

~~Each CA or Delegated Third Party SHALL~~The CA MUST ensure personnel assigned to a Trusted Role act only within the scope of their Trusted Role(s) when performing

responsibilities, using privileges, or using access assigned to that Trusted Role.

2.2 Access Management

2.2.1

The CA MUST ensure access to CA Infrastructure and/or Network Equipment is:

1. Follow a documented procedure for appointing individuals to Trusted Roles and assigning responsibilities to them; limited to personnel assigned to applicable Trusted Roles; and
2. Document the responsibilities and tasks assigned to Trusted Roles and implement “separation of duties” for such Trusted Roles based on the security-related concerns of the functions to be performed;
3. ~~Ensure that only~~ Principle of Least Privilege.

2.2.1.1

~~The CA MUST ensure~~ personnel assigned to Trusted Roles ~~have access to Secure Zones and High Security Zones; Ensure that an individual in a Trusted Role acts only within the scope of such role when performing administrative tasks assigned to that role; Require employees and contractors to observe the principle of “least privilege” when accessing, or when configuring access privileges on, Certificate Systems; Require that each individual in a Trusted Role use a unique credential that are authorized to access or authenticate to CA Infrastructure and/or Network Equipment use unique authentication credentials created by or assigned to that person in order to authenticate to Certificate Systems (for accountability purposes, the authorized individual.~~

2.2.1.2

~~The CA MUST NOT allow~~ group accounts or shared role credentials ~~SHALL NOT be used); If an authentication control used by a Trusted Role is a username and password, then, where technically feasible, implement the following controls: to authenticate to or access CA Infrastructure and/or Network Equipment.~~

1. ~~For accounts that are accessible only within Secure Zones or High Security Zones, require that passwords have at least twelve (12) characters;-~~
2. ~~For authentications which cross a zone boundary into a Secure Zone or High Security Zone, require Multi-Factor Authentication. For accounts accessible from outside a Secure Zone or High Security Zone require passwords that have at least eight (8) characters and are not be one of the user’s previous four (4) passwords; and implement account lockout for failed access attempts in accordance with subsection k;-~~
3. ~~When developing password policies, CAs SHOULD take into account the password guidance in NIST 800-63B Appendix A.-~~
4. ~~Frequent password changes have been shown to cause users to select less secure passwords. If the CA has any policy that specifies routine periodic password~~

~~changes, that period SHOULD NOT be less than two years. Effective April 1, 2020, if the CA has any policy that requires routine periodic password changes, that period SHALL NOT be less than two years.~~

~~Have a policy that requires Trusted Roles to log out of or lock workstations when no longer in use; Have a procedure to configure workstations with inactivity time-outs that log the user off or lock the workstation~~ 2.2.1.3

The CA MUST ensure authentication credentials are changed or revoked when associated authorizations are changed or revoked.

The CA MUST ensure access to CA Infrastructure and Network Equipment is disabled for personnel within twenty-four (24) hours of the termination of an individual's employment or contracting relationship.

2.2.1.4

The CA MUST ensure any account capable of authenticating to or accessing CA Infrastructure or Network Equipment is reviewed at a minimum frequency of every three (3) months.

The CA MUST ensure any account that is not necessary for the operation of CA Infrastructure or Network Equipment is deactivated or removed such that the account is no longer capable of authenticating to or accessing CA Infrastructure or Network Equipment.

2.2.1.5

The CA MUST ensure security measures are implemented that minimize the susceptibility of CA Infrastructure to unauthorized access through repeated attempts to authenticate to or access an account that has access to CA Infrastructure. These measures SHOULD prevent brute-force attacks which systematically enumerate authentication credentials such as username and password combinations. These measures SHOULD be based on a Risk Assessment.

2.2.2

The CA SHOULD ensure Workstations are configured in a manner that prevents continued access to the Workstation after a set ~~time of inactivity without input from the user (the CA or Delegated Third Party~~ period of inactivity, for example by automatically logging off active users. The allowed and configured duration of inactivity MUST be selected based on the CA's assessment of associated risks.

The CA MAY allow a ~~workstation~~ Workstation to remain active and unattended if the ~~workstation~~ Workstation is otherwise secured and running administrative tasks that would be interrupted by an inactivity ~~time-out~~ time-out or system lock); ~~Review all system accounts at least every three (3) months and deactivate any accounts that are no longer necessary for operations; Lockout account access to Certificate Systems after no more than five (5) failed access attempts, provided that this security measure;~~

The CA MUST ensure personnel assigned to Trusted Roles log out of or lock their Workstation(s) when not in active use.

2.2.3

The CA MUST enforce the use of Multi-Factor Authentication for:

1. Is supported by the Certificate System,
2. ~~Cannot be leveraged for a denial of service attack,~~ accounts on CA Infrastructure;
and
3. Does not weaken the security of this authentication control; access to CA Infrastructure.

Authentication based on the possession of a certificate can be used as part of Multi-factor Authentication only if the associated Private Key is stored in a key storage device certified as:

- ~~Implement a process that disables all privileged access of an individual to Certificate Systems within twenty four (24) hours upon termination of the individual's employment or contracting relationship with the CA or Delegated Third Party;~~ meeting at least FIPS 140-2 or 140-3, level 2 overall or level 3 physical;
or
- ~~Enforce Multi-Factor Authentication OR multi-party authentication for administrator access to Issuing Systems and Certificate Management Systems;~~
- ~~Enforce Multi-Factor Authentication for all Trusted Role accounts on Certificate Systems (including those approving the issuance of a Certificate, which equally applies to Delegated Third Parties) that are accessible from outside a Secure Zone or High Security Zone; and~~
- ~~Restrict remote administration~~ validated against a Common Criteria Protection Profile for Digital Signatures at EAL 4 augmented with AVA_VAN >=5 and ALC_FLR >= 2.

2.2.4

The CA MUST enforce the use of Multi-Party Control for physical access to any Root CA System.

2.2.5

The CA SHOULD ensure passwords used as authentication credentials for accounts on CA Infrastructure, Network Equipment, or Workstations are generated and managed in accordance with NIST 800-63B Appendix A.

The CA SHALL NOT require periodic password changes with a period less than two (2) years.

The CA MUST ensure passwords used as authentication credentials for accounts on CA Infrastructure have a minimum of twelve (12) characters.

The CA MUST ensure passwords used as authentication credentials for accounts on Network Equipment or Workstations have a minimum of eight (8) characters.

2.2.6

The CA MUST ensure any remote connection that enables administration of and/or access to ~~an Issuing System, Certificate Management System, or Security Support System~~ except when CA Infrastructure:

1. the remote connection originates from a device owned Workstation owned and/or controlled by the CA or Delegated Third Party, ;
2. the remote connection is is made through a temporary, non-persistent encrypted channel that is supported by Multi-Factor Authentication, non-persistent, and encrypted channel;
3. is authenticated using Multi-Factor Authentication; and
4. the remote connection is made to a designated intermediary device Network Equipment asset which:
itemize
5. is located within the CA's network, ;
6. is secured in accordance with these Requirements, ; and
7. that mediates the remote connection to the Issuing System. CA Infrastructure.

3. Monitoring, Logging, Auditing, and Incident Response

~~Certification Authorities and Delegated Third Parties SHALL~~

3.1 Monitoring and Logging

3.1.1

The CA MUST identify and document the monitoring and logging capabilities of CA Infrastructure and Network Equipment.

The CA SHOULD establish, evaluate, and maintain policies and procedures for:

1. Implement a System under the control of CA or Delegated Third Party Trusted Roles that continuously monitors, detects, and alerts personnel to any modification to Certificate Systems, Issuing Systems, Certificate Management Systems, Security Support Systems, and Front-End / Internal-Support Systems unless the modification has been authorized through a change management process. The CA or Delegated Third Party shall respond to the alert and initiate a plan of action within at most twenty-four (24) hours; identifying and utilizing the monitoring and logging capabilities of CA Infrastructure and Network Equipment; and
2. Identify those Certificate Systems under the control of CA or Delegated Third Party Trusted Roles capable of retaining, parsing, securing, and archiving the audit logs output by CA Infrastructure and Network Equipment.

The CA SHOULD review and update such policies and procedures at least annually.

3.1.1.1

The CA MUST ensure the monitoring and logging ~~system activity, and enable those systems to log and continuously monitor the events specified in Section 5.4.1 (3)~~ capabilities of CA Infrastructure and Network Equipment are enabled to the extent necessary to meet:

1. these Requirements; and
2. applicable obligations that depend on such audit logs (such as the requirements in Section 5.4.1 (3) of the Baseline Requirements for the Issuance and Management of Publicly-Trusted ~~Certificates; TLS Server Certificates).~~

3.1.1.2

The CA MUST ensure audit logs produced by the monitoring and logging capabilities of CA Infrastructure and Network Equipment include activities and/or events:

1. ~~Implement automated mechanisms under the control of CA or Delegated Third Party Trusted Roles to process logged system activity and alert personnel, using notices provided to multiple destinations, of possible~~necessary to detect possible:
 1. Critical Security Events; and
 2. ~~Require Trusted Role personnel to follow up on alerts of possible Critical Security Events; modifications to CA Infrastructure not authorized through the change management process outlined in Section 1.3; and~~
2. ~~Monitor the integrity of the logging processes for application and system logs through~~with sufficient detail to meet
 1. these Requirements; and
 2. applicable obligations that depend on such audit logs (such as the requirements in Section 5.4.1 (3) of the Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates).

3.1.2

The CA MUST ensure the integrity of logging processes within CA Infrastructure is monitored through:

1. continuous automated monitoring ~~and alerting or through a human review to ensure that logging and log integrity functions are effective. Alternatively, if a human review is utilized and the system is online, the process must be performed operating within CA Infrastructure; or~~
2. a review by personnel assigned to applicable Trusted Roles at least once every 31 days.
3. ~~Monitor the archival and retention of logs to ensure that~~

The CA MUST ensure such integrity monitoring is configured and managed in a manner sufficiently effective to identify possible audit log compromise.

3.1.2.1

The CA MUST ensure audit logs are retained ~~for the appropriate and/or archived for the amount of time in accordance with the disclosed business practices and applicable legislation.~~ necessary to meet:

1. ~~If continuous automated monitoring and alerting is utilized to satisfy sections 1.h. or 3.e. of these Requirements, respond to the alert and initiate a plan of action within at most~~ these Requirements; and
2. applicable obligations which depend on such audit logs (such as the requirements in Section 5.4.1 (3) of the Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates).

The CA SHOULD ensure retained and/or archived audit logs are kept and managed in a manner sufficiently effective to prevent unapproved alteration or access.

3.2 Audit Log Processing and Alerting

3.2.1

The CA MUST ensure audit logs are processed:

1. through automated mechanisms under the control of personnel assigned to applicable Trusted Roles; and
2. in a manner sufficiently effective to minimally identify possible:
 1. Critical Security Events; and
 2. unauthorized changes to CA Infrastructure.

3.2.2

The CA MUST ensure personnel assigned to applicable Trusted Roles are alerted via multiple mechanisms and/or communication channels of identified possible:

1. audit log compromise;
2. Critical Security Events; and
3. unauthorized changes to CA Infrastructure.

3.2.3

The CA MUST ensure personnel assigned to applicable Trusted Roles commence an initial response to alerts of Section 3.2.2 within twenty-four (24) hours ~~of the alert being generated.~~

3.2.3.1

The CA MUST ensure the initial response confirms whether the alert identifies a legitimate

1. audit log compromise;
2. Critical Security Event; and/or
3. unauthorized change to the CA Infrastructure.

The CA MUST ensure personnel assigned to applicable Trusted Roles create and follow an incident response plan for all legitimate alerts.

3.2.3.2

The CA SHOULD ensure incident response plans minimally include:

1. identification of the potential impact, scope, and severity of the incident;
2. containment of the incident to minimize further impact; and
3. identification and mitigation or eradication of the incident root cause(s).

4. Vulnerability Detection and Patch Management

Certification Authorities and Delegated Third Parties SHALL:

- a. Implement intrusion detection and prevention controls under the control of CA or Delegated Third Party Trusted Roles to protect Certificate Systems against common network and system threats;
- b. Document and follow a vulnerability correction process that addresses the identification, review, response, and remediation of vulnerabilities;
- c. Undergo or perform a Vulnerability Scan
 1. within one (1) week of receiving a request from the CA/Browser Forum,
 2. after any system or network changes that the CA determines are significant, and
 3. at least every three (3) months, on public and private IP addresses identified by the CA or Delegated Third Party as the CA's or Delegated Third Party's Certificate Systems;
- d. Undergo a Penetration Test on the CA's and each Delegated Third Party's Certificate Systems on at least an annual basis and after infrastructure or application upgrades or modifications that the CA determines are significant;
- e. Record evidence that each Vulnerability Scan and Penetration Test was performed by a person or entity (or collective group thereof) with the skills, tools, proficiency, code of ethics, and independence necessary to provide a reliable Vulnerability Scan or Penetration Test; and
- f. Do one of the following within ninety-six (96) hours of discovery of a Critical Vulnerability not previously addressed by the CA's vulnerability correction process:
 1. Remediate the Critical Vulnerability;
 2. If remediation of the Critical Vulnerability within ninety-six (96) hours is not possible, create and implement a plan to mitigate the Critical Vulnerability, giving priority to
 - i. vulnerabilities with high CVSS scores, starting with the vulnerabilities the CA determines are the most critical (such as those with a CVSS score

- of 10.0) and
 - ii. systems that lack sufficient compensating controls that, if the vulnerability were left unmitigated, would allow external system control, code execution, privilege escalation, or system compromise; or
3. Document the factual basis for the CA's determination that the vulnerability does not require remediation because
- i. the CA disagrees with the NVD rating,
 - ii. the identification is a false positive,
 - iii. the exploit of the vulnerability is prevented by compensating controls or an absence of threats; or
 - iv. other similar reasons.
- g. Apply recommended security patches to Certificate Systems within six (6) months of the security patch's availability, unless the CA documents that the security patch would introduce additional vulnerabilities or instabilities that outweigh the benefits of applying the security patch.

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