



**KPMG LLP**  
Mission Towers I  
Suite 100  
3975 Freedom Circle Drive  
Santa Clara, CA 95054

## Independent Accountants' Report

To the Board of Directors of CertiPath, Inc.:

We have examined the assertions by the management of CertiPath, Inc. ("CertiPath") and Symantec Corporation ("Symantec"), an independent service organization (sub-service provider) that provides Certification Authority (CA) support services to CertiPath, that in providing CertiPath Bridge CA and CertiPath Bridge CA – G2 (collectively referred to as the CBCA) and CertiPath Common Policy Root CA and CertiPath Common Policy Root CA – G2 (collectively referred to as the CRCA) services in Reston, Virginia; New Castle, Delaware; and Mountain View, California, during the period December 1, 2013 through November 30, 2014 –

- CertiPath disclosed its Business, Key Life Cycle Management, Certificate Life Cycle Management, and CA Environmental Control practices in its:
  - CertiPath X.509 Certificate Policy Version 3.25, dated March 17, 2014 ("CertiPath CP") (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
  - CertiPath CBCA Certification Practice Statement Version 1.7, dated August 9, 2012 ("CBCA CPS") that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
  - Memorandum of Agreement dated 11/15/2010 between the Federal PKI Policy Authority and CertiPath Inc. ("CBCA FPKI MOA") (including all sections except for III.C)
  - CertiPath CRCA Certification Practice Statement Version 1.7, dated August 9, 2012 ("CRCA CPS") that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
- CertiPath and Symantec provided their CA services in accordance with its disclosed practices including
  - CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
  - CBCA CPS that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
  - CBCA FPKI MOA (including all sections except for III.C)
  - CRCA CPS that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
- CertiPath maintained effective controls to provide reasonable assurance that
  - the Subscriber information was properly authenticated for the registration activities performed by CertiPath; and
  - Subscriber and relying party information was restricted to authorized individuals and protected from uses not specified in the CA's business practices disclosure
- Symantec maintained effective controls to provide reasonable assurance that
  - subordinate CA certificate requests were accurate, authenticated, and approved;



- the integrity of keys and certificates it manages was established and protected throughout their life cycles;
- logical and physical access to CA systems and data was restricted to authorized individuals;
- the continuity of key and certificate management operations was maintained; and
- CA systems development, maintenance and operations were properly authorized and performed to maintain CA systems integrity

based on the AICPA/CPA Canada WebTrust Principles and Criteria for Certification Authorities for the CBCA and CRCA.

The management of CertiPath and Symantec are responsible for their assertions. Our responsibility is to express an opinion on management's assertion based on our examination.

We conducted our examination in accordance with standards for attestation engagements established by the American Institute of Certified Public Accountants, and accordingly, included:

- Obtaining an understanding of CertiPath's key and certificate life cycle management business practices
- Obtaining an understanding of CertiPath and Symantec's controls over:
  - Key and certificate integrity;
  - The authenticity and confidentiality of subscriber and relying party information;
  - The continuity of key and certificate life cycle management operations, and
  - Development, maintenance, and operation of systems integrity.
- Selectively testing transactions executed in accordance with CertiPath's disclosed key and certificate life cycle management business practices
- Testing and evaluating the operating effectiveness of the controls
- Performing such other procedures as we considered necessary in the circumstances.

We believe that our examination provides a reasonable basis for our opinion.

The relative effectiveness and significance of specific controls at CertiPath and Symantec and their effect on assessments of control risk for subscribers and relying parties are dependent on their interaction with the controls, and other factors present at individual subscriber and relying party locations. We have performed no procedures to evaluate the effectiveness of controls at individual subscriber and relying party locations.

Because of the nature and inherent limitations of controls, CertiPath's ability to meet the aforementioned criteria may be affected. For example, controls may not prevent, or detect and correct, error, fraud, unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection of any conclusions based on our findings to future periods is subject to the risk that changes may alter the validity of such conclusions.

In our opinion, CertiPath's and Symantec's management assertions, as referred to above, are fairly stated, in all material respects, based on the AICPA/CPA Canada WebTrust Principles and Criteria for Certification Authorities.

This report does not include any representation as to the quality of CertiPath's and Symantec's services beyond those covered by the Trust Services Criteria for Certification Authorities, nor the suitability of any of CertiPath's and Symantec's services for any customer's intended purpose.



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The Board of Directors  
CertiPath Inc.

This report is intended solely for the information and use of CertiPath, Symantec, and the Federal PKI Policy Authority and is not intended to be, and should not be, used by anyone other than these named parties.

*KPMG LLP*

Certified Public Accountants  
Santa Clara, CA  
May 14, 2015



**Assertion of Management as to  
its Disclosure of its Business Practices and its Controls  
over its Certification Authority Operations  
during the period from December 1, 2013 through November 30, 2014**

May 14, 2015

CertiPath, Inc. ("CertiPath") provides the following certification authority services through the CertiPath Bridge CA and CertiPath Bridge CA – G2 (collectively referred to as the CBCA) and the CertiPath Common Policy Root CA and CertiPath Common Policy Root CA – G2 (collectively referred to as the CRCA):

- Subscriber registration
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate status information processing

CertiPath's CA Business Practices Disclosures includes the following:

Certification Authorities	Corresponding CA Business Practices Disclosures	
	Document Name, Version and Date	Included Sections
<b>CBCA</b>	<u>CertiPath X.509 Certificate Policy version 3.25 – dated March 17, 2014</u> ("CertiPath CP") – published on the CertiPath website	1, 2, 3, 4, 5, 6, 7, 8 and 9
	<u>CertiPath CBCA Certification Practice Statement Version 1.7, dated August 9, 2012</u> ("CBCA CPS") that is consistent with the CertiPath CP – restricted to authorized program members	1, 2, 3, 4, 5, 6, 7, 8 and 9
	<u>Memorandum of Agreement dated 11/15/2010 between the Federal PKI Policy Authority and CertiPath Inc.</u> ("CBCA FPKI MOA") – restricted to authorized program members	All except for section III.C which incorporates the Federal Bridge CP version 2.1 by reference
<b>CRCA</b>	<u>CertiPath X.509 Certificate Policy version 3.21 – dated February 25, 2013</u> ("CertiPath CP") – published on the CertiPath website	1, 2, 3, 4, 5, 6, 7, 8 and 9
	<u>CertiPath CRCA Certification Practice Statement Version 1.7, dated August 6, 2012</u> ("CRCA CPS") that is consistent with the CertiPath CP – restricted to authorized program members	1, 2, 3, 4, 5, 6, 7, 8 and 9

Management of CertiPath is responsible for establishing and maintaining effective controls over its CBCA and CRCA operations, including CA business practices disclosure, service integrity (including key and certificate life cycle management controls), and CA environmental controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

Controls have inherent limitations, including the possibility of human error and the circumvention or overriding of controls. Accordingly, even effective controls can provide only reasonable assurance with respect to CertiPath's CBCA and CRCA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Management has assessed the controls over its CBCA and CRCA operations. Based on that assessment, in CertiPath Management's opinion, in providing its CBCA and CRCA services at Reston, Virginia; New Castle, Delaware; and Mountain View, California during the period from December 1, 2013 through November 30, 2014 –

- CertiPath disclosed its Business, Key Life Cycle Management, Certificate Life Cycle Management, and CA Environmental Control practices in its:
  - CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8, and 9)
  - CBCA CPS that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8, and 9)
  - CBCA FPKI MOA (including all sections exception for III C)
  - CRCA CPS that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8, and 9)
- CertiPath provided such services in accordance with disclosed practices including:
  - CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8, and 9)
  - CBCA CPS that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8, and 9)
  - CBCA FPKI MOA (including all sections exception for III C)
  - CRCA CPS that was consistent with the CertiPath CP (including sections 1, 2, 3, 4, 5, 6, 7, 8, and 9)
- CertiPath maintained effective controls to provide reasonable assurance that
  - the Subscriber information was properly authenticated (for the registration activities performed by CertiPath); and
  - Subscriber and relying party information was restricted to authorized individuals and protected from uses not specified in the CA's business practices disclosure

based on the AICPA/CPA Canada WebTrust Principles and Criteria for Certification Authorities for the CBCA and CRCA including the following:

#### **CA Business Practices Disclosure**

- Certification Practice Statement
- Certificate Policy

#### **CA Business Practices Management**

- Certificate Policy Management
- Certification Practice Statement Management
- CP and CPS Consistency

#### **Service Integrity**

##### ***Certificate Life Cycle Management Controls***

- Subscriber Registration

**CA Environmental Controls**

- Personnel Security
- Monitoring and Compliance

CertiPath, Inc.

Jeff Nigriny  
*President*



**Assertion of Management as to  
its Disclosure of its Business Practices and its Controls  
over its Certification Authority Operations  
during the period from December 1, 2013 through November 30, 2014**

May 14, 2015

Symantec Corporation ("Symantec"), an independent service organization (sub-service provider), provides CertiPath Inc. ("CertiPath") with the following third party Certification Authority (CA) support services for the CertiPath Bridge CA and CertiPath Bridge CA – G2 (collectively referred to as the CBCA) and the CertiPath Common Policy Root CA and CertiPath Common Policy Root CA – G2 (collectively referred to as the CRCA):

- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate status information processing.

Management of Symantec is responsible for establishing and maintaining effective controls over its CA services supporting the CertiPath CBCA and CRCA operations, including applicable CA environmental controls, CA key management controls, and CA certificate life cycle management controls (for systems managed by Symantec on behalf of CertiPath). These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

Controls have inherent limitations, including the possibility of human error and the circumvention or overriding of controls. Accordingly, even effective controls can provide only reasonable assurance with respect to Symantec's CA services supporting CertiPath CBCA and CRCA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Management has assessed the applicable CA environmental controls, CA key management controls, and CA certificate life cycle management controls (for systems managed by Symantec on behalf of CertiPath) over CBCA and CRCA operations. Based on that assessment, in Symantec Management's opinion in providing CA support services to CertiPath for CBCA and CRCA operations in Delaware, New Castle and Mountain View, California during the period from December 1, 2013 through November 30, 2014 -

- Symantec has provided such services in accordance with the following practices:
  - CertiPath X.509 Certificate Policy version 3.25 – dated March 17, 2014 ("CertiPath CP") – published on the CertiPath website (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
  - CertiPath CBCA Certification Practice Statement Version 1.7, dated August 9, 2012 ("CBCA CPS") – restricted to authorized program members (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
  - CertiPath CRCA Certification Practice Statement Version 1.7, dated August 9, 2012 ("CRCA CPS") – restricted to authorized program members (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9)
- Symantec maintained effective controls to provide reasonable assurance that:
  - Subordinate CA certificate requests were accurate, authenticated, and approved;

- the integrity of keys and certificates managed by Symantec on behalf of CertiPath was established and protected throughout their life cycles;
- logical and physical access to CA systems and data was restricted to authorized individuals;
- the continuity of key and certificate life cycle management operations was maintained; and
- CA systems development, maintenance and operations were properly authorized and performed to maintain CA systems integrity

based on the AICPA/CPA Canada WebTrust Principles and Criteria for Certification Authorities including the following:

### **Service Integrity**

#### ***Key Life Cycle Management Controls***

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Destruction
- CA Key Archival
- CA Cryptographic Hardware Life Cycle Management

#### ***Certificate Life Cycle Management Controls***

- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Status Information Processing

#### ***Subordinate CA Certificate Life Cycle Management Controls***

- Subordinate CA Certificate Life Cycle Management

### **CA Environmental Controls**

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- Systems Development and Maintenance
- Business Continuity Management
- Monitoring and Compliance
- Audit Logging

Symantec Corporation

Nicolas Popp  
Vice President, User Authentication