



December 8, 2010

MEMORANDUM FOR JUDITH SPENCER
FEDERAL PKI POLICY AUTHORITY
CHAIR

FROM: JOHN E. CORNELL
SENIOR ASSISTANT GENERAL COUNSEL
PERSONAL PROPERTY DIVISION (LP)

SUBJECT: FPKIMA CA day zero audit

I've reviewed the compliance opinion tendered by the FPKIMA's auditor. My observations are as follows:

Audit Guidance	Observations
Identity of the Auditor and the individuals performing the audit	Auditor is eValid8 – individual auditor is Brian Dilley.
Competence of the Auditor to perform audits	Auditor is deemed competent.
Experience of the individuals performing the audit in auditing PKI systems	Auditor is deemed experienced.
Relationship of the Auditor to the entity that owns the PKI being audited. This relationship must clearly demonstrate the independence of the auditor from the entity operating or managing the PKI.	Outside auditor, deemed independent.
The date the audit was performed.	Date not indicated, but by context, the audit was performed sometime in the period between September 2, 2010 and November 5, 2010.
Whether a particular methodology was used, and if so, what methodology.	eValidated methodology used.

Which documents were reviewed as a part of the audit, including document dates and version numbers.	Common Policy CP version 3647-1.11, Common Policy CPS version 3.3
an audit summary is prepared, signed by the auditor	Requirement met.
State which procedures have been performed using the operational system.	Requirement met.
Report the findings on procedures performed	After changes to the CP and CPS, all evaluated procedures in conformance to the CPS.
State which procedures have not been performed, evaluating only training and procedures.	Requirement met.
Report the findings on items not evaluated	Procedures not evaluated were appropriately addressed in the technical operations manual.
State that the Entity CPS was evaluated for conformance to the applicable CP	Requirement met.
Report the findings	CPS conforms to the CP.