



**U. S. Department of Justice**  
Drug Enforcement Administration

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**Assertion of Management as to its Disclosure of its Business Practices  
and its Controls Over its Certification Authority Operations  
during the period from October 1, 2005, through December 31, 2005**

December 31, 2005

The Drug Enforcement Administration (DEA) Office of Diversion Control (ODC) operates as a certification authority (CA) known as the Controlled Substance Ordering System (CSOS) CA. CSOS-CA, as a subordinate CA of the DEA Diversion Control E-Commerce System Bridge Certification Authority, provides the following CA services:

- Certificate rekey
- Certificate issuance
- Certificate distribution (using an online repository)
- Certificate revocation
- Certificate status information processing (using an online repository)

The CSOS CA makes use of external registration authorities for specific subscriber registration activities as disclosed in the CSOS CA's business practice disclosures.

Management of the CSOS CA is responsible for establishing and maintaining effective controls over its CA operations, including CA business practices disclosure ([http://www.deaecom.gov/csos\\_cps.pdf](http://www.deaecom.gov/csos_cps.pdf)), 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.

There are inherent limitations in any controls, including the possibility of human error and the circumvention or overriding of controls. Accordingly, even effective internal controls can provide only reasonable assurance with respect to CSOS CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Management has assessed the controls over its CA operations. Based on that assessment, in DEA's Controlled Substance Ordering System Certification Authority (CSOS CA) management's opinion, in providing its CA services at Fair Lakes, Virginia (VA), CSOS CA, during the period from October 1, 2005 through December 31, 2005:

- Disclosed its key and certificate life cycle management business and information privacy practices and provided such services in accordance with its disclosed practices.

- Maintained effective controls to provide reasonable assurance that:
  - Subscriber information was properly authenticated (for the registration activities performed by the CSOS CA); and
  - The integrity of keys and certificates it managed was established and protected throughout their life cycles
- Maintained effective controls to provide reasonable assurance that:
  - Subscriber and relying party information was restricted to authorized individuals and protected from uses not specified in the CA's business practices disclosure;
  - 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/CICA WebTrust for Certification Authorities criteria ([http://ftp.webtrust.org/webtrust\\_public/tpafile7-8-03fortheweb.doc](http://ftp.webtrust.org/webtrust_public/tpafile7-8-03fortheweb.doc)) , including the following:
    - CA Business Practices Disclosure
    - 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
    - Subscriber Registration
    - Certificate Rekey
    - Certificate Issuance
    - Certificate Distribution
    - Certificate Revocation
    - Certificate Status Information Processing
    - CA Environmental Controls
    - Certification Practice Statement and Certificate Policy Management
    - 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
- Event Journaling

A handwritten signature in black ink that reads "Michael R. Mapes". The signature is written in a cursive style with a horizontal line at the end.

Michael R. Mapes

Chief, E-Commerce Section