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Paper Reference:	SECP_61_1210_10
Action:	For Decision

Modification Send Back: SECMP0009

1. Purpose

The Change Board has determined that [SECMP0009 'Centralised Firmware Library'](#) should be returned to the Panel so that the Modification Report can be updated to incorporate the Security Sub Committee (SSC) recommendations.

This paper sets out the Change Board's discussions and the next steps for this modification. A copy of the updated Final Modification Report (FMR) and its attachments are attached to this paper.

2. Change Board's discussions

SECMP0009 was presented to the Change Board for vote on 19 September 2018. We highlighted comments received from the SSC in the Modification Report Consultation (MRC), which were:

- that the information in the Firmware Information Repository proposed under SECMP0009 is 'locked' to ensure that the content cannot be manipulated. This mitigates the risk of malicious activity which could alter the information e.g. to cause confusion or to hide information that Suppliers need to know about;
- that the spreadsheet is provided only to SEC Parties and is not published to the general public. The SSC doesn't see any value in making the information available more widely. Restricting the publication to SEC Parties mitigates the risk of attackers and hackers having ready access to the information; and
- that entries are vetted by a SECAS security expert prior to publication to ensure that any sensitive information e.g. about security vulnerabilities, are appropriately worded and that the SSC is properly notified. The SSC doesn't believe that a simple review by a SECAS security expert will delay the publication and is a sensible risk mitigation that will:
 - a) prevent the publication of sensitive information; and
 - b) ensure that the SSC is made aware of any security vulnerabilities to enable it to meet its SEC obligations to monitor security risks.

These views were circulated to the Working Group ahead of the Change Board vote and Working Group members expressed support for these recommendations. However, the Change Board noted that this would require the Modification Report to be clarified with this development, in particular that the repository would no longer be public, which would only be possible by sending the report back to the Panel.

The Change Board therefore made the decision to send this modification back to the Panel, so it could agree the updated FMR to clarify the situation following the Working Group's consideration of the SSC's recommendations.

3. Next Steps

In accordance with SEC Section D8.19, the Panel can either:

- Accept the Change Board's recommendations and return SECMP0009 to the Working Group for further development; or
- Reject the Change Board's recommendations and return the FMR to the Change Board unchanged for it to vote upon.

We have already consulted with the Proposer and the Working Group over the SSC's recommendations, and they have agreed and accepted these into the solution. The Working Group has also reviewed the updated Modification Report to include these clarifications, and this can be found in Attachment A. We do not believe there is anything else the Working Group needs to consider.

As such, we consider that it would be beneficial to submit the revised Modification Report directly to a second Modification Report Consultation to confirm and consult on the updated contents before the Change Board votes.

Progression timetable

We recommend that SECMP0009 follows the following timetable:

Activity	Date
Panel considers Send-Back request and updated Modification Report	12 Oct 18
Second Modification Report Consultation	16 Oct 18 – 06 Nov 18
Change Board vote	21 Nov 18

We highlight that this revised timetable means that it is no longer possible to include SECMP0009 in the November 2018 SEC Release, and that the February 2019 SEC Release would now be the earliest release that this modification could be included in. We have updated the Modification Report accordingly.

4. Recommendations

The Panel is requested to:

- **AGREE** that SECMP0009 remains a Path 2: Authority Determined Modification Proposal;
- **AGREE** the legal text continues to deliver the intention of the modification;
- **AGREE** the revised implementation approach; and
- **AGREE** to submit SECMP0009 directly to the Report Phase for a second Modification Report Consultation.

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5 October 2018