Statement of Alan Paller

Director of Research, The SANS Institute

Before The House Subcommittee on Information Policy, Census, and National Archives and the Subcommittee on Government Management, Organization, and Procurement, of the Committee of Oversight and Government Reform

February 14, 2008

Summary

- Federal agencies are under massive attack from China and other nation states, and agencies have demonstrated that they are not able to protect their systems or the sensitive information stored on those systems.
- In 2000, President Clinton vowed to make sure the federal government leads by example in cyber security.
- Government has failed to lead in large measure because of a provision that was originally made in the Government Information Security Reform Act (GISRA), but carried over to the Federal Information Security Management Act (FISMA). Federal cyber security has been set back, and more than \$300 million in scarce cyber security funding has been wasted because of this error.
- A small legislative change and a shift in oversight technique could turn this situation around.
- Time is of the essence. The Director of National Intelligence reported last week to the Senate Select Committee on Intelligence, that cyber exploitation is growing "more sophisticated, more targeted, and more serious."

My name is Alan Paller; I am director of research at the SANS Institute. Thank you for the opportunity to testify today. While there are doubtless many things that could be done to improve the security of the Federal government's cyber infrastructure, my testimony today will focus on one item that, in my professional opinion, would materially improve the security of that infrastructure without requiring the expenditure of more money.

The Cyber Threat Is Expanding and Growing In Sophistication

Federal agencies and government contractors are facing a wave of cyber attacks from sophisticated nation states. The attacks began in earnest at least five years ago (our first firm evidence is from May 2003) and are so successful that agencies that know they were penetrated do not know how much information was taken, how widespread the compromises were on their systems, nor which systems are still under control of the attackers.

Those attacks resulted in sensitive data about national security technologies and strategies and practices being copied and moved to hostile nations. The stolen data, although not classified, is highly sensitive – such as details on the technologies that the US considers too sensitive to export and the specifications for the aviation-mission-planning system for Army helicopters, as well as Falconview 3.2, the flight-planning software used by the Army and Air Force. The Commander of the US Air Force Cyber Command, Major General William Lord, said in August of 2006 that "There is a nation-state threat by the Chinese... China has downloaded 10 to 20 terabytes of data from the NIPRNet¹."

¹ NIPRNet is the computer network used by the Department of Defense for unclassified information transfer.

Moreover, the fact that federal computers are under the control of potentially hostile foreign governments means that the US government agencies cannot be sure the data they provide is accurate or whether it may have been altered to be misleading.

The attacks are continuing, accelerating, and spreading to the commercially owned US critical infrastructure. A week ago today, the Director of National Intelligence, J. Michael McConnell, told the Senate Select Committee on Intelligence,

"Our information infrastructure-including the internet, telecommunications networks, computer systems, and embedded processors and controllers in critical industries-increasingly is being targeted for exploitation and potentially for disruption or destruction, by a growing array of state and non-state adversaries. Over the past year, cyber exploitation activity has grown more sophisticated, more targeted, and more serious. The Intelligence Community expects these trends to continue in the coming year."

A Presidential Cyber Security Promise That Could Not Be Kept Because of FISMA

In February of 2000, in the aftermath of the Mafia Boy attacks on Amazon, CNN, Yahoo, and Dell, the President of the United States promised twenty Internet leaders that the US government would "lead by example" in building defenses that would block the growing scourge of cyber crime. But neither the Clinton Administration nor the Bush Administration have led by example, in large part because they were hamstrung by an error in a law called GISRA, the Government Information Security Reform Act. GISRA later morphed into FISMA, but the FISMA drafters did not know of the error, and did not fix it. Because of that error in GISRA, not only are government systems far less secure than they could be, but more than a \$300 million dollars of scarce federal security money was spent on writing reports that were never read, and that did not improve security.

How do we know this? Because SANS trains more than 14,000 cyber security professionals each year — with more than 15% employed in federal information security. Our alumni in the working for the federal government and for contractors, like other alumni around the world, keep us up to date on what works and what doesn't in cyber security.

SANS also operates the Internet Storm Center, an early warning system, so we have a pretty clear picture of the threat landscape as well as the effectiveness of the defenses.

Major Federal Successes in Cyber Security Illuminate How FISMA Can Be Improved

On December 10, 2007, SANS published a compendium of federal successes in information security, entitled "What Works in Implementing the US National Strategy to Secure Cyberspace: Case Studies of Success in the War on Cybercrime and Cyber Espionage." I have attached that document for your reference.

A quick review of the federal successes listed in the "What Works" document shows that most were accomplished without any FISMA support or relevance, but that the most important one (the Federal Desktop Core Configuration or FDCC) was enabled by a clause in FISMA [3544(b)(2)(D)(iii)].

That one powerful clause worked because it showed agencies how to prioritize their cyber security actions. It did that by providing direct, unequivocal guidance.

What Went Wrong Because of FISMA

The error in GISRA and later in FISMA was the lack of priority setting. It is best illuminated by showing exactly what went wrong when agencies tried to implement FISMA.

First, the National Institutes of Standards and Technologies (NIST), following its FISMA mandate, wrote a series of guidance documents, later made mandatory by OMB, telling agencies how to comply with FISMA. NIST failed to prioritize the actions it required agencies to take. Instead NIST wrote guidance at a very high level – leaving interpretation to the agencies and their Inspector Generals (IGs). The lack of priorities, along with language open to broad interpretation, made it nearly impossible for agencies to do all the things their IGs might consider as required. None of the agencies had sufficient budgets to do everything, so they did what they could and received Ds and Fs on their report cards because the IGs found that they hadn't done everything.

Far worse than bad grades, however, was the three hundred million dollars wasted in the name of GISRA and then FISMA compliance. That money could have gone a long way toward improving the security of federal systems.

The money was wasted because both Congress and OMB forced agencies (through the annual Congressional Report Card and the President's Management Agenda) to write Certification and Accreditation (C&A)reports on 100% of their systems, using C&A requirements documented by NIST. Every agency had to prepare reports on every system every three years with annual reviews of those systems every year. That would be a wonderful way to monitor improvements in security if the security actions being reported are the essential ones that actually block attacks and improve response to attacks. But guidance from NIST was far too high level. Most of the NIST-specified security measures are disconnected from the key protections. And because the report writers felt obliged to cover all the NIST controls, the reports became essentially useless. Most were never read by the operational staff who would have to implement key security controls. We know that the reports were never read from complaints received from dozens of people frustrated by the process, but the most telling data comes from a meeting of the Northern Virginia Information System Security Association, the membership group of cyber security managers and consultants. While addressing an audience of 72 security professionals there, I asked them to raise their hands if their job involved drafting C&A reports. Fifty-five raised their hands. Then I asked them to keep their hands up if anyone had ever read their reports besides the people who wrote them. Only four kept their hands up.

In other words,

- 1. FISMA became a report writing exercise caused by
- 2. NIST language that focused on 'everything' and
- 3. 'a single scorecard/report card' that indicated 'compliance' to everything (and nothing) and
- 4. gave a 'false sense' that systems were actually secure -- as demonstrated by the continued infiltrations and exfiltrations.
- 5. In this case, compliance often had little to do with actual security but Agencies spent all the money on compliance. Why? Because...
- 6. Leaders are smart. They want to keep their jobs. Congress and OMB (and the press) focused so exclusively on the report cards that CIOs simply spent the money to get Congress and OMB off their backs.

Proof That Tighter FISMA Language Improves Security

One exception demonstrates how to correct the problem. Subsection 3544(b)(2)(D)(iii) of Title 44 tells agencies to establish, implement minimum security configurations for every system. The Air Force

demonstrated that following this Congressional rule to the letter enabled it to reduce vulnerabilities significantly, to cut patching time from seven weeks to 3 days and to save tens of millions of dollars. It improved security while reducing costs.

The single most important correction needed in FISMA is to include language that directs NIST to prioritize the actions it tells agencies to take and the frequency for ensuring each action is taken: NIST guidance would provide specific actions and specific time frames for executing those actions. The most critical actions are to be performed quite frequently. For example:

- Actions performed continuously would include such things as stopping malicious packets from
 entering the network and alerting security teams when any unauthorized system or service is
 added to the network.
- Actions performed weekly would include things such as ensuring every system is configured in accordance with the agency's standard secure configuration, and
- Actions that could be performed annually would include such things as security awareness testing.

FISMA can be an important part of the successful defense of the computers and networks that run our government. But to do that it needs to direct agencies to spend their security money on the defenses that make a difference in their ability to protect the information they keep. You can make FISMA do that. At the request of your staffers, we have provided draft changes and report language that we think would help make FISMA more effective.

I would be happy to answer your questions.

About Alan Paller

Alan Paller is director of research for the SANS Institute.

SANS is the primary training organization for the technologists who battle every day to protect the computer systems and networks in the global infrastructure. SANS alumni, more than 68,000 in all, are the security managers, security auditors, firewall analysts, intrusion detection analysts, system and network administrators, incident handlers, forensic analysts, and law enforcement officers who are responsible for building, maintaining, and auditing their organizations' cyber defenses, fending off attackers, and, when attackers succeed, investigating the crime and tracking down the criminals. SANS is also a licensed graduate degree granting institution and an ANSI-accredited security skills certification body. SANS also is a source of situational awareness and continuing education to these technologists on the front-line of protecting our critical infrastructure. Every day, all day and night, analysts at SANS Internet Storm Center receive reports of new attacks and anomalies, analyze those attacks, cross reference them related information and publish daily diaries of the newest attacks being seen. Internet Storm Center also processes information from sensors monitoring 500,000 Internet-connected systems around the world. Each week, more than two hundred thousand individuals and organizations receive SANS NewsBites and @RISK to keep them up to date on new developments in information security and new vulnerabilities and threats.

One of Alan's most important roles at SANS is identifying the most promising security practices and shining a bright light on them so they can be used by other organizations to improve cyber security. His work has been recognized by the Federal CIO Council that named him the Azimuth Award winner in 2005 and by President Clinton who named him as one of the first members of the President's National Infrastructure Assurance Council. Before helping to create the SANS Institute, Alan was an entrepreneur who, with four others, created the first large-scale computer graphics company, took it public, and merged it into a New York Stock Exchange company. Alan's degrees are from Cornell University and the Massachusetts Institute of Technology.

Federal Funding:

Federal agencies send security people to SANS for training and pay tuition for them.

What Works in Implementing the US National Strategy to Secure Cyberspace Case Studies of Success in the War on Cybercrime and Cyber Espionage A SANS Consensusⁱ Document

December 10, 2007

As the *US National Strategy to Secure Cyberspace* approaches its fifth anniversary, prudence dictates that the nation measure what has been accomplished under that strategy to determine which efforts should be continued and enhanced, and which need to be altered or discarded.

The successes of the projects described in this paper for securing the nation's cyber infrastructure are worthy of our praise. In fact, they are critical to national security and should be adopted more broadly. However, as we acknowledge these successes, its also essential to acknowledge that the level and sophistication of cyber threats are increasing. Organized crime groups in Eastern Europe and Asia are spending hundreds of millions of dollars each year to buy exploits and recruit and employ the best hackers in the world; they are leading a \$10 billion financial crime spree. Terrorists are using money stolen from US banks, through cyber fraud, to pay for the bombs that kill innocent people around the world. Certain rogue nation states have concluded that their very survival depends on their ability to penetrate and corrupt US government computers, and they have been enormously successful in infiltrating computers at the Department of Defense (DoD), military contractors, Department of Energy (DoE) labs, the State and Commerce Departments and more. Even the Department of Homeland Security's (DHS's) own computers are not immune and have suffered breaches in their environment.

Clearly much more needs to be done to slow the tidal wave of cybercrime. We hope that the successes illuminated here will serve as prototypes to demonstrate that government leadership by example is both possible and effective.

Measures of Success

Projects were selected for inclusion only after determining that there is evidence of substantial and measurable improvement in the US capacity to meet one or more of the three strategic objectives that shape the *National Strategy to Secure Cyberspace*:

- 1. Prevent cyber attacks against America's critical infrastructures;
- 2. Reduce national vulnerability to cyber attacks; and
- 3. Minimize damage and recovery time from cyber attacks that do occur.

The evidence of each project's impact needed to be direct, substantial, and measurable since any other criteria would result in the inclusion of an enormous number of ineffective initiatives, most of which have also been very expensive. For example, the Department of Homeland Security's Cyber Storm I national exercise in 2006 might be considered by some to have been a success. It was not included in this list because no substantial, measurable change in behavior or effect can be attributed to it. We may have learned some lessons from the exercise, but there is no substantial evidence to indicate an intent to act on those lessons. On the other hand, the deployment of DoD's Common Access Card (CAC) resulted in a large decrease in the

opportunity for unauthorized access to government computers. Similarly, the National SCADA (Supervisory Control and Data Acquisition) Test Bed and the Control Systems Security Program have already substantially and measurably improved the security of systems that control much of the nation's most critical infrastructures.

In the policy arena, substantial advances have been made, ranging from the ratification of the Council of Europe Cybercrime Convention, to the appointment in DHS of an Assistant Secretary with primary responsibility in cyber security, to the addition of a cyber security sidebar to the Homeland Security Strategy. These advances help shape the landscape of cyber security, but it is nearly impossible to show that they have resulted in significant improvement in any of the three strategic objectives of the *National Strategy*.

For each successful initiative, we describe 1) the challenge it met; 2) the organizations that acted to make it happen; 3) what they did and how they did it; 4) how we know it worked and; 5) an estimate of procurement and operating costs.

1. THE CHALLENGE: Decrease the security vulnerabilities of millions of federal computers while reducing procurement and operating costs.

Federal government agencies spend tens of millions of dollars trying to configure their computers safely and then hundreds of millions more testing and deploying system and security patches as they become available. Even with spending in the multiple millions of dollars, most federal computers do not have consistently secure configurations and most federal agencies take weeks or months to patch their systems. This allows fast-moving cyber attackers the ability to exploit the vulnerabilities before the patches are installed. An analysis by NSA, published in 2002, found that as many as 90% of all vulnerabilities are eliminated through up-to-date patching and secure configuration.

Who: The U.S. Air Force (USAF), National Security Agency (NSA), Defense Information Systems Agency (DISA), National Institute of Standards and Technologies (NIST), DHS, and the Office of Management and Budget (OMB), plus the Center for Internet Security (CIS), Microsoft, and Dell.

What: A standard desktop operating system configuration with integrated security, deployed on over 450,000 computers.

The most important success in federal government cyber security to date is the Federal Desktop Core Configuration (FDCC) and its predecessor proof-of-concept project in the U.S. Air Force. The Air Force, with the help of NSA, NIST and DISA, created a standard configuration of two popular Windows operating systems and then used its procurement power to ensure all relevant computer suppliers delivered computers with the secure configuration installed at the time of delivery. The result was radically reduced costs for implementing security because the standard security configurations were built-in by the vendors. Additional savings were experienced in patch testing and user support since the resources required for these operational activities were significantly reduced. The Air Force proved that procurement, using well-vetted standard

configurations, can improve the overall security posture while lowering procurement and operating costs. The Air Force also tested the hypothesis that implementing secure configurations would cause software applications to break. What they learned was that only a few legacy applications were impacted and then only if those applications required users to run the applications with elevated privileges (a particularly dangerous practice because it puts the system at increased risk of being compromised by remote cyber-attackers).

How effective is this initiative in the U.S. Air Force? Lieutenant General Michael Peterson, Chief of Warfighting Integration and USAF CIO, told Military Information Technology magazine, "[the initiative is] reducing our network patch time from 57 days to less than 72 hours while simultaneously cutting the workload for system administrators in half. Ultimately this reduces the cost of software licensing by over \$100 million across the FYDP". And of course, faster system patching makes it more difficult for hackers to breach critical systems, resulting in lower costs AND improved cyber security.

The Office of Management and Budget (OMB) actively followed the Air Force experiment from the beginning. When the Air Force project proved successful, OMB leadership issued instructions for all federal agencies to standardize on the secure Air Force configuration as adjusted by NIST. OMB also proactively resolved potential application incompatibility problems by issuing a mandate that no software can be purchased that: 1) doesn't run on the secure operating system configuration or: 2) requires elevated privileges.

The result: Federal agencies gain improved security configurations, faster system patching and lowered procurement and operating costs. Active leadership in the federal government made it viable for Microsoft to create configurations of Windows that are much more secure than standard Microsoft operating system configurations, ultimately, as Microsoft makes the same secure configurations generally available, enabling buyers throughout the world to gain the same benefits of improved security and lower costs.

This project also illustrates how the public-private partnership can work. First, the National Security Agency and the Center for Internet Security (a public-private partnership composed of more than 100 private companies and US and international government members) developed a consensus draft secure configuration for Windows and other operating systems and applications. The Windows configurations were honed by the USAF, Microsoft, NIST, DISA and NSA to become the Federal Desktop Core Configuration (FDCC). Once the configuration was tested and validated, Microsoft, Dell and other PC vendors contracted with the government to deliver the securely configured versions of Windows operating systems. Prior to the creation of the FDCC, these vendors actually wanted to deliver more secure systems but it was too difficult and expensive when every enterprise had its own definition of the 'right' configuration. This project made it possible for system vendors to meet their business objectives AND deliver systems that actually improved security.

Lesson Learned: In procurement, scale means leverage. The combined software budget of the Air Force was substantial. Microsoft and Dell were able to deliver the common configuration easily because the cost of development and deployment could be spread over hundreds of

thousands of copies of the software. The combined budgets provided leverage with the appropriate incentives for them to further reduce costs for baking security into the systems they deliver to government and industry.

How much did it cost? Developing the benchmark configurations cost approximately \$2.4 million, and initial testing of the new configurations at the USAF cost another \$500,000 but the implementation of those configurations actually saved money. The Air Force saved \$100 million in software procurement costs by consolidating its procurement across 38 legacy contracts. Additional tens of millions of dollars are being saved in reduced system administration and help-desk costs every year.

2. THE CHALLENGE: Identifying cyber attacks on federal agencies and illuminating federal systems that have been corrupted by cyber attackers. This is especially important in an age of botnets where increasing numbers of federal systems are infected through spear phishing and then used to attack other organizations or to steal sensitive information.

Who: The National Cyber Security Division of the US Department of Homeland Security, National Security Agency, Office of Management and Budget, CERT/CC at Carnegie Mellon University, and several cabinet-level agencies.

What: The Einstein program: enables full-time monitoring and analysis of network traffic received and sent by federal agencies resulting in identification of patterns that may be signs of persistent presence of unauthorized software and users on federal networks. Its expansion into the Trusted Internet Connection (TIC) program extends these benefits to all federal agencies.

Fourteen federal agencies have already deployed Einstein sensors at their network gateways to capture information about network traffic and feed it to analysis programs run by CERT/CC at Carnegie Mellon University in Pittsburgh on behalf of the US Department of Homeland Security. In a dramatic demonstration of the promise of the deployment, network traffic transmitted by the Department of Agriculture and received by the Einstein sensors at the Department of Transportation contained malicious packets that indicated Agriculture systems had been penetrated and infected. The Einstein analysts quickly contacted Agriculture and helped that agency find and eliminate the infection. This is just one of numerous similar examples of Einstein's ability to find infected systems inside agencies.

Under the new Trusted Internet Connection program, federal agencies will reduce the number of Internet connections and ensure all traffic is monitored through the Einstein analytical systems.

How much did it cost? Einstein cost \$33 million over the past three years and an additional \$14 million per year. TIC will cost hundreds of millions.

3. THE CHALLENGE: Improving the security of industrial control systems at nuclear power plants, utilities and other critical infrastructure elements in both the government and private sectors.

Supervisory Control and Data Acquisition (SCADA) and other control systems often last 20 to 30 years, and most industrial control systems were designed and installed before cyber security threats were known or widely understood. Utilities have now come under direct attack and some facilities have even been subject to extortion demands by hackers who have broken through the defenses. Thousands of public and private sector organizations need to move quickly toward improving the security of these critical systems.

Who: The Department of Energy; Department of Homeland Security; the State of New York, the Idaho National Laboratory (INL), Sandia National Laboratory (SNL), and Pacific Northwest National Laboratory (PNNL), plus a consortium of control system vendors.

What: The National SCADA Test Bed and the Control Systems Security Program and the SCADA Security Procurement Specifications.

Government Accountability Office (GAO) reports in March 2004 (http://www.gao.gov/new.items/d04354.pdf) and September 2007

(http://www.gao.gov/new.items/d071036.pdf) document "increasing risks due to cyber threats, system vulnerabilities, and the serious potential impact of attacks" against the control systems that manage power plants, electric distribution systems, oil and gas pipelines, water systems, transportation systems, and dams. Reliance on technologies from the 1960s and 1970s, combined with increasing use of newer Windows operating systems and insecure direct and wireless connections of control systems to external networks, have led to substantial vulnerabilities within the nation's critical industries.

The most important success in building a public-private partnership to improve cyber security has been the national effort to secure control systems. The National SCADA Test Bed team assembled a representative group of control systems from most major suppliers and performed in-depth vulnerability tests on those systems. Their testing was sophisticated and comprehensive and the vulnerabilities they found were both important and common across vendor systems. When the Test Bed team finds significant vulnerabilities, INL engineers demonstrate the problem to the system manufacturer. These manufacturers then correct the problem when possible and INL engineers verify that the vulnerability has been eliminated. The vendors are then able to deliver the corrected system to each new customer and sometimes fix the vulnerability in existing systems. Federal funds were significantly augmented with funding from manufacturers and asset owners who wanted to support the Test Bed and ensure testing went beyond those funded by federal agencies.

Vulnerabilities discovered by the testers need to be corrected in all control systems. DHS and DoE funded INL to develop and distribute procurement specifications that utilities in the US and around the world are already using to ensure their control system vendors are delivering baked-in security. With the assistance of the Multi-State Information Sharing and Analysis Center, led by New York State, and the United Kingdom's Centre for the Protection of the Critical National Infrastructure (CPNI), these specifications are being adopted in the US and are being considered for formal adoption by a ten-country consortium.

The result: Many vulnerabilities in control systems have been found and corrected, and, using the new procurement specifications, buyers of SCADA and control systems can tell vendors exactly what is needed and ensure important vulnerabilities are eliminated.

How much did it cost? The National SCADA Test Bed and Control Systems Security Program cost approximately \$17 million annually in federal funds over the past four years (funds that have been cut back sharply in the current year) and more than \$4 million in private funding (contributions of equipment for testing, for example) by control system vendors and utilities in support of testing and where industry needed additional testing not funded by the federal programs.

4. THE CHALLENGE: Raising international barriers and increasing criminal penalties for cybercrime by identifying and capturing more cyber criminals and incarcerating them for longer periods.

Cyber criminals live and work in many countries. When one of those countries has weak laws against hacking or when that country's law enforcement organizations have neither the skills nor the will to pursue hackers attacking foreign systems, the criminals know they can operate with impunity. Even where cybercrime is illegal, sentences for convicted cyber hackers were very lenient -- often simply probation.

Who: The Justice Department's Computer Crime and Intellectual Property Section (CCIPS), the FBI's Cyber Security Program, and the cyber security programs of the US Secret Service and the US Postal Inspection Service.

What: 1) Bilateral and multi-lateral agreements between law enforcement groups in the US and other countries allowing immediate capture of cyber criminals through real-time cooperation; 2) Better education of prosecutors, investigators and judges about how to investigate and prosecute cybercrime cases and the damage to businesses and other organizations caused by cybercrime; 3) Improved law enforcement techniques and tools to identify and capture more criminals and; 4) the National Cyber-Forensics and Training Alliance (NCFTA).

The US Department of Justice's Computer Crime and Intellectual Property Section (CCIPS) has attempted to standardize cybercrime law internationally through the development and support of the Council of Europe's Convention on Cybercrime. CCIPS used active diplomacy to provide technical assistance to countries around the world to help them synchronize their cybercrime laws, and, with the help of federal investigative agencies, helped them build much stronger cyber law enforcement capabilities. In addition, by developing and maintaining the G8 Hi-Tech Crime Subgroup's 24/7 Points of Contact Network involving 50 nations, CCIPS facilitated a means of expediting requests for, and responses to, international needs for assistance in urgent cybercrime matters. CCIPS also created the Computer Hacking and Intellectual Property (CHIP) Network of approximately 230 Assistant United States Attorneys (AUSAs) around the country. The CHIP Network coordinates investigations and provides training, knowledge, and assistance on the

prosecutions of computer and intellectual property crimes to AUSAs in United States Attorneys' offices throughout the country.

At the same time, the FBI built cyber squads in dozens of field offices and established legal attaché offices ("legats") in 60 countries around the world. Those squads and international law enforcement partners supported by the legats have had impressive success in finding and capturing cyber criminals. In parallel with these efforts, the FBI has put a dozen full-time cyber investigators into a facility that also houses representatives of universities and more than a dozen leading US corporations. The public-private initiative, called The National Cyber-Forensics and Training Alliance (NCFTA), has accounted for the identification of more than 1,900 phishing drop sites (where the victims' data are stored), resulting in the prevention of tens of millions of dollars in losses. NCFTAs' work also led to the recent arrest of several dozen people involved in international credit card fraud enabled by cyber-theft of private information.

The US Secret Service and the US Postal Inspection Service also played huge roles in many major, successful cyber investigations and are pillars of the national initiative to make cyber criminals pay for their crimes.

The result: Law enforcement officials have had many more successful investigations and prosecutions of cyber criminals, and judges have been meting out much longer sentences – six years or more in some recent trials. That's up from less than a year just five years ago. All of this has helped send a good deterrent message that is essential to securing cyberspace.

How much did it cost? Because almost every major crime today has a cyber dimension and nearly all cybercrime has an international dimension, it's impossible to calculate the cost of this important initiative. The NCFTA costs \$1.5 million per year (in addition to the salaries of the federal investigators).

5. THE CHALLENGE: Making remote exploits of federal computers more difficult by ensuring that only authorized users gain access. User names and passwords are insufficient to ensure that only authorized people are using computers.

Who: Department of Defense (DoD), GSA, OMB and most federal civilian agencies.

What: Implementing two-factor authentication for all personnel requiring access to government computer systems.

The US Department of Defense distributed Common Access Cards (CAC) enabling the DoD to ask every would-be user of its networks and computer systems to have a card in his or her possession and to know a personal identification number or password. Requiring two different forms of identification – one the user has in his or her physical possession and one the user knows, is called two-factor authentication. Two-factor authentication is a proven method for decreasing intrusions and other types of security breaches by ensuring that stolen user names and passwords are insufficient to gain access to networks.

DoD's success with its Common Access Card led the US Office of Management and Budget to issue Homeland Security Presidential Directive 12 (HSPD-12), requiring all federal agencies to implement two-factor authentication. As agencies fully implement HSPD-12, they will gain the same benefits that DoD has obtained.

The result: On January 25, 2007, Lt. General Charles Croom, USAF, told an audience in Colorado Springs, "Although there are six million probes of Defense Department networks a day, successful intrusions have declined 46 percent in the past year because of a requirement that all DoD personnel log on to unclassified networks using Common Access Cards."

Large-scale procurement of Common Access Cards by DoD and emerging procurements by other federal agencies under HSPD 12 has already reduced the cost of deployment from over \$100 to less than \$50 per card.

How much did it cost? The DoD Common Access Card program cost more than \$6 million just for the R&D process and then tens of millions more for deployment. HSPD-12 implementation to date has cost in excess of \$100 million.

6. THE CHALLENGE: Safeguarding sensitive data stored on mobile (laptop) computers from loss or theft.

Tens of thousands of government computers have been lost or stolen and the data on many of those systems were unprotected and unencrypted. The embarrassment to federal agencies has been acute and senior officials have been consumed by responding to Congressional inquiries and press questions.

Who: DoD, GSA, Office of Management and Budget, and the Multi-State Information Sharing and Analysis Center.

What: SmartBuy provided federal government agencies with a low-cost acquisition vehicle for laptop encryption software and extends the benefits of that procurement to state and local governments.

Encrypting the data on mobile devices (laptop computers, PDAs and cell phones) makes sense but encryption software and hardware are expensive. Consequently, most organizations have been unable to commit to widespread implementation. The economics of software offers an easy solution but it requires a catalyst to make it happen. The cost of making each additional copy of a software package is very low, so if a software vendor is assured of selling vast numbers of additional copies, that vendor can lower the price and still earn potentially greater profits. One buyer has to be first to prove that the number of copies to be sold is very large. In this project, the Federal SmartBuy program proved to software vendors that they can lower prices substantially when volumes are large enough.

The result: Under the old GSA contract, federal agencies could buy, for example, SafeBoot, a popular full-disk laptop encryption product, for \$99 per copy in quantities under 100. When an

agency buys 5,000 to 10,000 copies, the price is \$81.99 per copy. Most agencies that buy more copies have been able to push the prices down to between \$55 and \$60 per copy. But in September 2007, under the new large-volume SmartBuy initiative, the Department of Agriculture bought 180,000 copies of encryption software for \$1.8 million or \$10 per copy. In other words, consolidated federal buying power guaranteed sufficient quantities that enabled the software vendor to provide discounts of nearly 90%, and still earn a healthy profit. This example of federal procurement leadership is especially important because the US government contracting initiative enabled state and local governments to also buy software under the new contract. This allowed fiscally strapped small government organizations to buy five to ten times as many copies of encryption software for the same price they would have had to pay without federal procurement leadership.

How much did it cost? The effort to create the SmartBuy contract cost about \$300,000 but the resulting savings are huge. Just at the Department of Agriculture, the direct savings exceeded \$7 million.

The Most Promising Federal Cyber Security Program on the Horizon

THE CHALLENGE: Improving the ability of agencies to keep their systems patched in the face of a flood of new vulnerabilities that exceeds human capacity to find and fix before systems are exploited.

Who: The National Security Agency (NSA) and the National Institutes for Standards and Technology (NIST), Microsoft and other commercial system and security software vendors.

What:, The Security Content Automation Program (S-CAP) will make it possible to automate the entire chain of events from vendors reporting vulnerabilities and how to find them, to vulnerability testers finding the flaws, to system mangers and configuration software programs recording the full state of each system, ultimately to patching tools actually correcting the problems, all in real time, without human intervention.

This is one of the most promising projects in cyber security because it engages all the players, from application and system software developers to system management tool suppliers to security tool suppliers, to upgrade their tools so they can work together to protect federal and other critical systems. It promises to radically lower the cost of maintaining security "hygiene" and promises a future in which security professionals focus on other problems.

How much did it cost? Approximately \$12 million to date but the amount will grow substantially when commercial organizations re-engineer their processes and software to use the automated protocols. On the other hand, once S-CAP is fully operational, agencies and industry can expect substantial cost reductions because they will be able to eliminate much of the manual effort currently associated with finding and fixing vulnerabilities in the software they have deployed.

Why is it promising and not yet a full success? S-CAP has not yet been implemented in enough commercial tools to enable full automation.

¹ The authors of this document are Alan Paller of the SANS Institute, Paul Kurtz of Goodharbor, Jim Lewis of the Center for Strategic and International Studies, John Gilligan of SRA, and Frank Reeder. Others who provided valuable input include Will Pelgrin of New York State, Christopher Painter of the US Department of Justice, Marjorie Blumenthal of Georgetown University, Mark Weatherford of the State of Colorado, Clint Kreitner of the Center for Internet Security, Marcus Sachs of Verizon, Eugene Schultz of High Tower, and Mason Brown, Johannes Ullrich, Stephen Northcutt and Eric Cole of the SANS Institute.