Three Broad Categories Of Control Impact

Categories

Products

Security Products, Operating Systems, Penetration tools

Systems and Processes

Penetration Testing – Networks & Products

Technology/Research

Vulnerability/Exploit Research, Technical transfers and sharing

Impacted

Products

Symantec, Intel Security, Microsoft, Ionic, FireEye, etc.

Systems and Processes

IT, Tel-Com, Aero/Def, Financial Services, Energy, mobile, etc.

Technology/Research

All security vendors, component suppliers, labs, academia, ISAOs, auditors (Financial, Healthcare), data analytics

Intrusion Software Controls
(4A – Systems, Equipment, Components)

Proposed ECCN 4A005

- "Systems," "equipment," or "components" therefore, "specially designed" or modified for the generation, operation or delivery of, or communication with, "intrusion software"

- Intrusion software: (Cat 4) "Software" "specially designed" or modified to avoid detection by 'monitoring tools', or to defeat 'protective countermeasures', of a computer or network-capable device, and performing any of the following:
    a) The extraction of data or information, from a computer or network-capable device, or the modification of system or user data; or
    b) The modification of the standard execution path of a program or process in order to allow the executions of externally provided instructions

Intrusion Software Impacts
(4A – Systems, Equipment, Components)

Systems and Processes

(4A005)

(Penetration Testing)

Equipment/Components

Commercially Available

Appliances/Servers

Desktops

Laptops

Network Switches

Routers (wireless)

Storage (Flashdrives)

3rd Party Suppliers

Libraries (Exploits)

Custom Code

Labs and Researchers

Becomes a Penetration

→

"System" **

Specially Designed

(Internal/External Service)

Engagement Planning

Engagement Scoping

Secure Test Environment
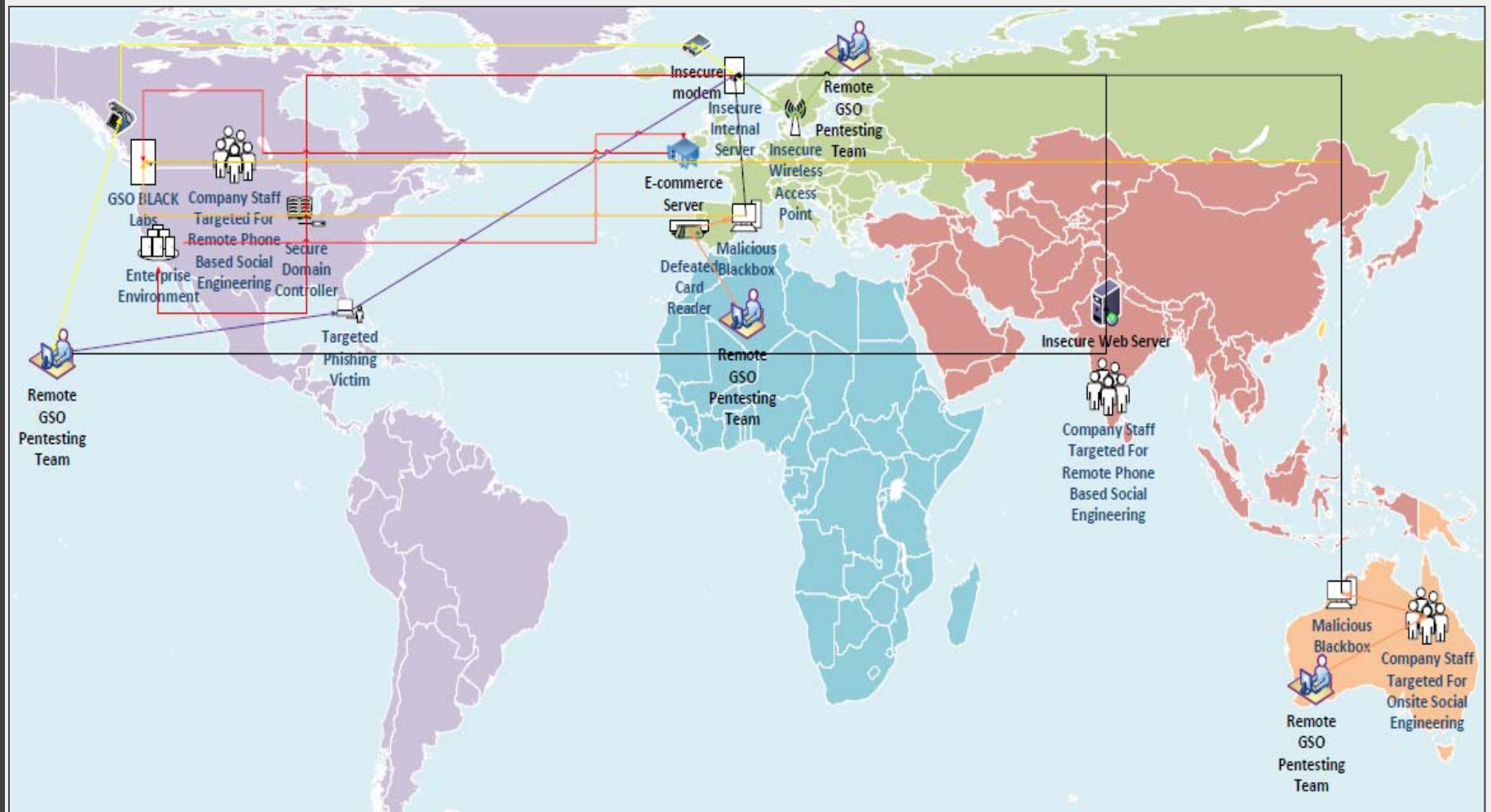
Eq/Comp/SW Assembled

Networks/Products Tested

Custom Code Created

Vulnerabilities/Exploits ID'ed

Reporting and Research

Mitigation/Remediation

**Commercial equipment when combined to create a "penetration system" is "specially designed" to penetrate, and is thus captured for control by the rule

Multi-National Network Penetration Testing

A Diagram of Geographical & Technological Complexity

Colored Lines indicate various methods of network attack such as phishing, poorly configured passwords on modems, insecure card readers, insecure wireless modems, onsite social engineering (tailgating), etc.