Tel: 314-889-1100
Fax: 314-889-1101
www.bdo.com

101 S Hanley Rd, #800
St. Louis, MO 63105

REPORT OF INDEPENDENT ACCOUNTANT

To the Management of Microsoft Public Key Infrastructure ("PKI") Services:

We have examined Microsoft PKI Services' management assertion that for its Certification Authority ("CA") operations in the United States of America and territories, throughout the period May 1, 2019 to April 30, 2020 for its root, issuing, and intermediate CAs enumerated in Attachment B, Microsoft PKI Services has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in in the applicable versions of its Microsoft PKI Services Certificate Policy and Certification Practice Statement enumerated in Attachment A

- maintained effective controls to provide reasonable assurance that:
  - Microsoft PKI Services' Certification Practice Statement is consistent with its Certificate Policy; and
  - Microsoft PKI Services provides its services in accordance with its Certificate Policy and Certification Practice Statement

- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated; and
  - subordinate CA certificate requests are accurate, authenticated, and approved

- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

based on the WebTrust Principles and Criteria for Certification Authorities v2.1. Microsoft PKI Services' management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion, based on our examination.

The relative effectiveness and significance of specific controls at Microsoft PKI Services and their effect on assessments of control risk for subscribers and relying parties are dependent on their interaction with the controls and other factors present at individual subscriber and relying party locations. Our examination did not extend to controls at individual subscriber and relying party locations and we have not evaluated the effectiveness of such controls.

Microsoft PKI Services does not escrow CA keys, does not provide subscriber key lifecycle management services, and does not provide certificate suspension services. Accordingly, our examination did not extend to controls that would address those criteria.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Because of the nature and inherent limitations of controls, Microsoft PKI Services' ability to meet the aforementioned criteria may be affected. For example, controls may not prevent, or detect and correct, error, fraud, unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection of any conclusions based on our findings to future periods is subject to the risk that changes may alter the validity of such conclusions.

In our opinion, management's assertion, as referred to above, is fairly stated in all material respects.

Without modifying our opinion, we noted the following matter during our procedures:

Matter Topic		Matter Description
1.	Audit Logging	For one of the twenty-two CAs selected for testing, the CA logging settings were not configured to log certificate issuance at the CA level. Logging certification issuance was configured at the registration authority application level.

This report does not include any representation as to the quality of the services of Microsoft PKI Services beyond those covered by the WebTrust Principles and Criteria for Certification Authorities v2.1 for CAs enumerated in Attachment B, nor the suitability of any of the services of Microsoft PKI Services for any customer's intended purpose.

This report is intended solely for the information and use of Microsoft Corporation and is not intended to be and should not be used by anyone other than this specified party.

The World Health Organization classified the COVID-19 outbreak as a pandemic in March 2020. Based on the rapid increase in exposure globally, the gravity or length of the impact of the COVID-19 outbreak cannot be estimated at this time.

BDO USA, LLP

June 29, 2020

ATTACHMENT A – CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS IN-SCOPE

Policy Name for Microsoft Trusted CAs	Policy Version	Policy Date
Microsoft PKI Services Certificate Policy	Version 3.1.1	July 10, 2018
Microsoft PKI Services Certificate Policy	Version 3.1.2	August 5, 2019
Microsoft PKI Services Corporate Certification Practice Statement	Version 3.1.2	July 31, 2018
Microsoft PKI Services Corporate Certification Practice Statement	Version 3.1.3	August 5, 2019

ATTACHMENT B – IN-SCOPE CAs

- AP Root Certificate Authority 2014
- Azure Hardware Root Certificate Authority 2019
    - Microsoft Cerberus AOC CA 01
    - Microsoft Cerberus AOC CA 02
    - Microsoft Cerberus EOC CA 01
    - Microsoft Cerberus EOC CA 02
    - Microsoft Corsica AOC CA 01
    - Microsoft Corsica AOC CA 02
    - Microsoft Corsica EOC CA 01
    - Microsoft Corsica EOC CA 02
    - Microsoft Overlake Celestial Peak AOC CA 01
    - Microsoft Overlake Celestial Peak AOC CA 02
    - Microsoft Overlake Celestial Peak EOC CA 01
    - Microsoft Overlake Celestial Peak EOC CA 02
- Microsoft Corporation Third Party Marketplace Root
    - Linux Boot Loader Signing CA 2016
    - Microsoft Andromeda Attestation PCA 2017
        - Microsoft Andromeda Attestation CA 2017
        - Microsoft Andromeda Attestation Online CA-1 2017
        - Microsoft Andromeda Attestation Online CA-2 2017
    - Microsoft Andromeda Attestation PCA 2017
        - Microsoft Andromeda Attestation CA 2017
    - Microsoft Andromeda Firmware Debug CA 2017
    - Microsoft Band Firmware CA 2015
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    - Microsoft Corporation KEK CA 2011
    - Microsoft Corporation Third Party Marketplace PCA
    - Microsoft Corporation UEFI CA 2011
    - Microsoft Devices OEM Code Sign CA 2018
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        - Microsoft HoloLens Attestation CA 2018
    - Microsoft HoloLens Firmware Debug CA 2018
    - Microsoft OEM Custom CA 2014
    - Microsoft Pinewood Attestation PCA 2019
        - Microsoft Pinewood Attestation CA 2019
    - Microsoft SH2 Firmware CA 2018
    - Microsoft SH2 Firmware Debug CA 2018
    - Microsoft Surface Accessories Windows Firmware CA 2013
    - Microsoft Surface Common Services CA 2014
        - Microsoft Surface MoBB-1 CA 2014
        - Microsoft Surface MoBB-1 Boot Core CA 2019
    - Microsoft Surface FFF Firmware CA 2018
    - Microsoft Surface FFF Firmware Debug CA 2018
    - Microsoft Surface Ganymede Attestation PCA 2017
        - Microsoft Surface Ganymede Attestation CA 2017

        - Microsoft Surface Ganymede Attestation Online CA-5
        - Microsoft Surface Ganymede Attestation Online CA-6
    - Microsoft Surface Ganymede Attestation Online CA-1 2017
    - Microsoft Surface Ganymede Attestation Online CA-2 2017
    - Microsoft Surface Ganymede Attestation Online CA-3 2017
- Microsoft Surface Hub Firmware CA 2015
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- Microsoft Surface LFF 3 Firmware CA 2016
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- Microsoft Surface LFF 3 UEFI PK CA 2016
- Microsoft Surface NFF Firmware CA 2015
- Microsoft Surface NFF Firmware Debug CA 2015
- Microsoft Surface NFF UEFI PK CA 2015
- Microsoft Surface Services for Windows 8 Pro CA 2012
    - Microsoft Surface AFF Firmware CA 2015
    - Microsoft Surface AFF Firmware Debug CA 2015
    - Microsoft Surface AFF UEFI PK CA 2015
    - Microsoft Surface for Windows 8 Pro CA 2012
    - Microsoft Surface for Windows 8 Pro Firmware CA 2012
    - Microsoft Surface for Windows 8 Pro v2 Firmware CA 2013
    - Microsoft Surface for Windows 8 Pro v2 UEFI PK CA 2013
    - Microsoft Surface LFF 2 Firmware CA 2014
    - Microsoft Surface LFF 2 UEFI PK CA 2014
    - Microsoft Surface LFF Firmware CA 2014
    - Microsoft Surface LFF UEFI PK CA 2014
    - Microsoft Surface MFF Firmware CA 2014
    - Microsoft Surface MFF UEFI PK CA 2014
    - Microsoft Surface XLFF Firmware CA 2014
    - Microsoft Surface XLFF UEFI PK CA 2014
- Microsoft Surface Services for Windows RT CA 2012
    - Microsoft Surface for Windows RT EK Issuing CA 01
    - Microsoft Surface for Windows RT EK Issuing CA 02
    - Microsoft Surface for Windows RT EK Issuing CA 03
    - Microsoft Surface for Windows RT EK Issuing CA 04
    - Microsoft Surface SFF Attestation CA 2013
        - Microsoft Surface SFF Attestation Issuing CA 2014
- Microsoft Surface Services for Windows RT CA 2012
    - Microsoft Surface for RT Firmware CA 2012
    - Microsoft Surface for Windows RT CA 2012
    - Microsoft Surface SFF Firmware CA 2013
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    - Microsoft Surface with Windows RT v2 Boot ROM Fuse CA 2013
    - Microsoft Surface with Windows RT v2 Firmware CA 2013
    - Microsoft Surface with Windows RT v2 Platform Key CA 2013
    - Microsoft Surface with Windows RT v2 Services Mobile CA 2013
- Microsoft Surface XLFF 2 Firmware CA 2016
- Microsoft Surface XLFF 2 Firmware Debug CA 2016
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- Microsoft Universal Store OnePay PCA 2015
- Microsoft Windows Group Edition KEK CA 2015
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- Microsoft Windows IoT PCA 2015
- Windows Phone KEK CA 2012
- Microsoft XCloud PCA 2018
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- Microsoft Development Root Certificate Authority 2014
  - Microsoft Development PCA 2014
  - Microsoft Mobile Development PCA 2014
- Microsoft ECC Development Root Certificate Authority 2018
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- Microsoft ECC Devices Root Certificate Authority 2017
  - Microsoft ECC Surface Accessory Firmware CA 2018
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    - Windows Hello 7BB5EEFC CA 2018
    - Windows Hello 19B92965 CA 2018
    - Windows Hello B5A8CEAC CA 2018
- Microsoft ESRP Root Certificate Authority 2017
  - ESRP0 RSA PCA 2017
  - ESRP2 RSA PCA 2017
- Microsoft IEB Services ECC Root 2013
  - 343 Industries Section 3 Production CA 2017
  - 343 Industries Section 3 Test CA 2017
  - Microsoft Central Access Authentication ECC PCA 2015
  - Microsoft Central Access Authentication ECC PCA 2015
  - Universal Store Non-Prod ECC PCA 2015
  - Universal Store Onestore ECC PCA 2015
  - Microsoft Code Name 4x4 PCA 2017
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  - Universal Store PCE ECC PCA 2015
  - Universal Store Prod ECC PCA 2015
  - Universal Store Prod ECC PCA 2015
- Microsoft IEB Services RSA Root 2013
  - Poseidon Accessory Authentication PCA 2013
  - Triton Accessory Authentication PCA 2013
  - Universal Store Central Access Authentication RSA PCA 2016
  - Universal Store PROD RSA PCA 2017
  - Universal Store PCE RSA PCA 2016

    - Xbox Services RSA PCA 2013
    - Xbox Services RSA PCA 2013
    - Xbox Services RSA PCA 2013
- Microsoft Mobile Root Certificate Authority 2015
    - J2ME Manufacturer Domain CA 2015
    - J2ME Trusted Third Party Domain CA 2015
    - Lumia Labeling CA
    - Lumia Labeling CA
    - Microsoft Mobile PCA 2015
    - Phones UEFI CA 2016
    - Microsoft VSMC PCA 2017
- Microsoft Services Federal Root 1
    - Microsoft Services Federal PCA 1
- Microsoft Services Partner Root
    - CloudBuild Source Cache AP Classic Intermediate CA 2016
    - CloudBuild Source Cache High Trust Intermediate CA 2016
    - Microsoft Exchange Services CA 2015
    - Microsoft KMS CA 2011
    - Microsoft KMS CA 2011
    - Microsoft KMS Issuing CA 2011
    - Microsoft Office Service Infrastructure INT Issuing CA 2011
    - Microsoft Office Service Infrastructure Issuing CA 2011
    - Microsoft Office Service Infrastructure Partner CA 2012
        - Microsoft Office Service Infrastructure China Issuing CA 2012
        - Microsoft Office Service Infrastructure China TIP Issuing CA2012
    - Microsoft Office Service Infrastructure PR Issuing CA
    - Microsoft Office Service Infrastructure TIP INT Issuing CA
    - Microsoft Office Service Infrastructure TIP Issuing CA 2011
    - Microsoft Office Service Infrastructure TIP PR Issuing CA 2011
    - Microsoft RSD Software CA 2016
    - Microsoft RSD Software Ring 0 CA 2018
- Microsoft TPM Root Certificate Authority 2014
    - Microsoft System Guard Runtime Monitor Attestation PCA 2018
    - Microsoft SGRM Report Attestation PCA 2018
- Microsoft Enterprise Identity Verification Root Certificate Authority 2020

Microsoft Corporation
One Microsoft Way
Redmond, WA 98052-6399

Tel 425 882 8080
Fax 425 706 7329
www.microsoft.com

Microsoft

MICROSOFT PUBLIC KEY INFRASTRUCTURE SERVICES' MANAGEMENT ASSERTION

Microsoft Public Key Infrastructure ("PKI") Services operates the Certification Authority ("CA") services known as the root, issuing, and intermediate CAs enumerated in Attachment B, and provides the following CA services:

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA certification

The management of Microsoft PKI Services is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosure in its repository, CA business practices management, CA environmental controls, CA key lifecycle management controls, certificate lifecycle management controls, and subordinate CA certificate lifecycle management 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 controls can only provide reasonable assurance with respect to Microsoft PKI Services CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Microsoft PKI Services' management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in Microsoft PKI Services management's opinion, in providing its CA services at Redmond, Washington, throughout the period May 1, 2019 to April 30, 2020, Microsoft PKI Services has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environment control practices in the applicable versions of its Microsoft PKI Services Certificate Policy and Certification Practice Statement enumerated in Attachment A

- maintained effective controls to provide reasonable assurance that:
  - Microsoft PKI Services' Certification Practice Statement is consistent with its Certificate Policy; and
  - Microsoft PKI Services provides its services in accordance with its Certificate Policy and Certification Practice Statement

- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated; and
  - subordinate CA certificate requests are accurate, authenticated, and approved

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One Microsoft Way
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- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

based on the WebTrust Principles and Criteria for Certification Authorities v2.1, including the following:

CA Business Practices Disclosure

- Certification Practice Statement (CPS)
- Certificate Policy (CP)

CA Business Practices Management

- Certificate Policy Management
- Certification Practice Statement Management
- CP and CPS Consistency

CA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical & Environmental Security
- Operations Management
- System Access Management
- Systems Development, Maintenance, and Change Management
- Disaster Recovery, Backups, and Business Continuity Management
- Monitoring and Compliance
- Audit Logging

CA Key Lifecycle Management Controls

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival
- CA Key Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management
- CA Key Transportation
- CA Key Migration

Certificate Lifecycle Management Controls

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

Microsoft Corporation
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Redmond, WA 98052-6399

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Fax 425 706 7329
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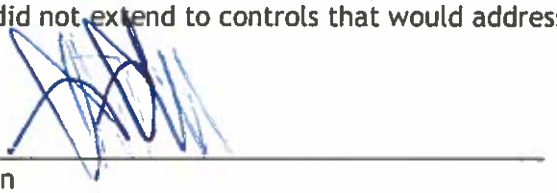
Microsoft

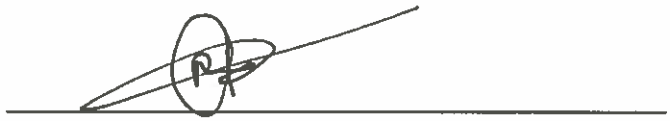
Subordinate CA and Cross Certificate Lifecycle Management

- Subordinate CA Certificate and Cross Certificate Lifecycle Management

Microsoft PKI Services does not escrow CA keys, does not provide subscriber key lifecycle management services, and does not provide certificate suspension services. Accordingly, our assertion did not extend to controls that would address those criteria.



Chuck Chan
Corporate Vice President, Engineering Security & Release Services



Raza Syed
Distinguished Engineer, Product Release & Security Services

June 29, 2020

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  - Microsoft Andromeda Firmware Debug CA 2017
  - Microsoft Band Firmware CA 2015
  - Microsoft Band Firmware Debug CA 2016
  - Microsoft Corporation KEK CA 2011
  - Microsoft Corporation Third Party Marketplace PCA
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  - Microsoft Devices OEM Code Sign CA 2018
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  - Microsoft HoloLens Attestation PCA 2018
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    - Microsoft Surface for Windows RT EK Issuing CA 03
    - Microsoft Surface for Windows RT EK Issuing CA 04
    - Microsoft Surface SFF Attestation CA 2013
        - Microsoft Surface SFF Attestation Issuing CA 2014
- Microsoft Surface Services for Windows RT CA 2012
    - Microsoft Surface for RT Firmware CA 2012
    - Microsoft Surface for Windows RT CA 2012
    - Microsoft Surface SFF Firmware CA 2013
    - Microsoft Surface SFF Platform Key CA 2013
    - Microsoft Surface with Windows RT v2 Boot ROM Fuse CA 2013
    - Microsoft Surface with Windows RT v2 Firmware CA 2013
    - Microsoft Surface with Windows RT v2 Platform Key CA 2013
    - Microsoft Surface with Windows RT v2 Services Mobile CA 2013
- Microsoft Surface XLFF 2 Firmware CA 2016
- Microsoft Surface XLFF 2 Firmware Debug CA 2016
- Microsoft Surface XLFF 2 UEFI PK CA 2016
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- Microsoft Surface XSFF Firmware Debug CA 2018
- Microsoft Surface XSFF UEFI PK CA 2018
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- Microsoft Windows Group Edition KEK CA 2015
- Microsoft Windows IoT KEK CA 2015
- Microsoft Windows IoT PCA 2015
- Windows Phone KEK CA 2012
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  - Universal Store Prod ECC PCA 2015
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  - Triton Accessory Authentication PCA 2013
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  - Universal Store PROD RSA PCA 2017
  - Universal Store PCE RSA PCA 2016
  - Xbox Services RSA PCA 2013
  - Xbox Services RSA PCA 2013
  - Xbox Services RSA PCA 2013
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  - J2ME Manufacturer Domain CA 2015
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  - Lumia Labeling CA
  - Lumia Labeling CA
  - Microsoft Mobile PCA 2015
  - Phones UEFI CA 2016
  - Microsoft VSMC PCA 2017
- Microsoft Services Federal Root 1
  - Microsoft Services Federal PCA 1
- Microsoft Services Partner Root
  - CloudBuild Source Cache AP Classic Intermediate CA 2016

    - CloudBuild Source Cache High Trust Intermediate CA 2016
    - Microsoft Exchange Services CA 2015
    - Microsoft KMS CA 2011
    - Microsoft KMS CA 2011
    - Microsoft KMS Issuing CA 2011
    - Microsoft Office Service Infrastructure INT Issuing CA 2011
    - Microsoft Office Service Infrastructure Issuing CA 2011
    - Microsoft Office Service Infrastructure Partner CA 2012
        - Microsoft Office Service Infrastructure China Issuing CA 2012
        - Microsoft Office Service Infrastructure China TIP Issuing CA2012
    - Microsoft Office Service Infrastructure PR Issuing CA
    - Microsoft Office Service Infrastructure TIP INT Issuing CA
    - Microsoft Office Service Infrastructure TIP Issuing CA 2011
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    - Microsoft RSD Software CA 2016
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    - Microsoft SGRM Report Attestation PCA 2018
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