



CERTAINLY LLC

WEBTRUST FOR CERTIFICATION AUTHORITIES REPORT

JULY 01, 2024, TO JUNE 30, 2025

Attestation and Compliance Services



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SECTION I

INDEPENDENT ACCOUNTANT'S REPORT

REPORT OF THE INDEPENDENT ACCOUNTANT

To the Management of Certainly LLC (“Certainly”):

Scope

We have examined Certainly’s [management assertion](#) that for its Certification Authority (“CA”) operations at its San Francisco, California, USA, Santa Clara, California, USA, and Reston, Virginia, USA, locations, for its Root CA certificates as enumerated in Appendix A, Certainly has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices within its
 - [Certainly CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v1.7, dated February 1, 2024;](#)
 - [Certainly CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v1.8, dated October 24, 2024; and](#)
 - [Certainly CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v1.9, dated March 1, 2025](#)
- maintained effective controls to provide reasonable assurance that:
 - Certainly provides its services in accordance with its Certificate Policy and Certificate 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 (for the registration activities performed by Certainly); 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

throughout the period July 01, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

Certainly does not escrow its CA keys and does not provide subscriber key generation services, certificate rekeys, subscriber key management services, subscriber key storage and recovery services, integrated circuit card lifecycle management, certificate suspension, or subordinate CA and cross certificate lifecycle management services. Accordingly, our examination did not extend to controls that would address those criteria.

Certification Authority’s Responsibilities

Certainly’s management is responsible for its assertion, including the fairness of its presentation, and the provision of its described services in accordance with the WebTrust Principles and Criteria for Certification Authorities v2.2.2.

Practitioner's Responsibilities

Our responsibility is to express an opinion on Certainly management's assertion based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and in accordance with International Standard on Assurance Engagements 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. 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.

We are required to be independent and to meet our other ethical responsibilities in accordance with the Code of Professional Conduct established by the AICPA and the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants.

We applied the Statements on Quality Control Standards established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

The relative effectiveness and significance of specific controls at Certainly 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.

Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. For example, because of their nature, controls may not prevent, or detect unauthorised access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection to the future of any conclusions based on our findings is subject to the risk that controls may become ineffective.

Opinion

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

This report does not include any representation as to the quality of Certainly's services other than its CA operations at its San Francisco, California, USA, Santa Clara, California, USA, and Reston, Virginia, USA, locations, nor the suitability of any of Certainly's services for any customer's intended purpose.

Other Matters

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

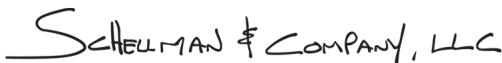
Matter Topic		Matter Description
1	Early CRL Entry Removal	Certainly disclosed in Bugzilla #1954889 that on February 13, 2025, a version of Boulder containing a logic bug was deployed that could have resulted in entries for some revoked certificates being removed from the CRL before the certificates had expired. A fix was fully deployed on March 18, 2025, when the Let's Encrypt team notified Certainly of the bug and related fix. Upon further evaluation, Certainly determined that while the CRL generation bug was present and deployed in the Certainly environment, the specific system configuration did not set the feature flags necessary to engage the new code pathways that triggered the bug. Consequently, the CRLs remained complete and compliant throughout the period.
2	Sample Websites Unavailable	Certainly disclosed in Bugzilla #1968836 that on May 23, 2025, a configuration change to Boulder was deployed that discontinued the inclusion of the OCSP URI in end-entity certificates. On May 24, 2025, the service hosting Certainly's sample sites with valid, revoked, and expired certificates failed. The monitoring tool alerted the on-call engineer of the failure, but the alert was initially acknowledged and incorrectly classified as a brief interruption to the service that would self-recover. On May 26, 2025, the alert was further investigated, a fix was deployed, and the affected sites were restored.

During our assessment, Schellman performed testing of certificate issuance, on a sample basis, and noted that there were no certificate deficiencies identified in any of the samples tested. As a result, our opinion is not modified with respect to these matters.

While Certainly disclosed its reported issues in Bugzilla during the period July 01, 2024 to June 30, 2025, we have noted only those disclosures relevant to the CAs enumerated in Appendix A and applicable to the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

Use of the WebTrust seal

Certainly's use of the WebTrust for Certification Authorities Seal constitutes a symbolic representation of the contents of this report and it is not intended, nor should it be construed, to update this report or provide any additional assurance.



Schellman & Company, LLC
 Tampa, FL
 August 21, 2025

SECTION 2

MANAGEMENT'S ASSERTION

MANAGEMENT'S ASSERTION

Certainly LLC ("Certainly") operates the Certification Authority ("CA") services for its Root CA certificates as enumerated in Appendix A, and provides the following CA services:

- Subscriber registration
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation

The management of Certainly is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosures on its [website](#), CA business practices management, CA environmental controls, CA key lifecycle management controls, and 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 Certainly's Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Certainly management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in Certainly management's opinion, in providing its CA services at its San Francisco, California, USA, Santa Clara, California, USA, and Reston, Virginia, USA, locations, Certainly has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in its:
 - [Certainly CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v1.7, dated February 1, 2024;](#)
 - [Certainly CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v1.8, dated October 24, 2024;](#) and
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- maintained effective controls to provide reasonable assurance that:
 - Certainly provides its services in accordance with its Certificate Policy and Certificate 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; and
 - subscriber information is properly authenticated (for the registration activities performed by Certainly);
- 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.

throughout the period July 01, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#), including the following:

CA Business Practices Disclosure

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

CA Business Practices Management

- Certificate Policy and Certificate Practice Statement Management

CA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- System Development and Maintenance
- 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 and Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management

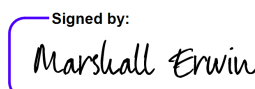
Certificate Lifecycle Management Controls

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

Certainly does not escrow its CA keys and does not provide subscriber key generation services, certificate rekeys, subscriber key management services, subscriber key storage and recovery services, integrated circuit card lifecycle management, certificate suspension, or subordinate CA and cross certificate lifecycle management services. Accordingly, our assertion does not extend to controls that would address those criteria.

Certainly has disclosed the following matters publicly on Mozilla’s Bugzilla platform. These matters were included below due to being open during the period July 01, 2024 to June 30, 2025.

Bug ID	Summary	Opened	Closed	Resolution
1954889	Early CRL Entry Removal	03/18/2025	03/27/2025	Closed
1968836	Sample Websites Unavailable	05/27/2025	N/A	Open

Signed by:

CC4E953CF7B7435...
 Marshall Erwin
 Chief Information Security Officer
 Certainly LLC
 August 21, 2025

APPENDIX A

CERTAINLY'S ROOT AND ISSUING CAs

CERTAINLY'S ROOT AND ISSUING CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Certainly Root E1	Certainly Root E1	B4585F22E4AC756A4E8612A1361C5D9D031A93FD84FE778FA3068B0FC42DC2
Certainly Intermediate E1	Certainly Intermediate E1	98DD2A75F65748F2667BC4B079177813647C17EDCC6DEE92F1F06668BE0F1A3D
Certainly Root R1	Certainly Root R1	77B82CD8644C4305F7ACC5CB156B45675004033D51C60C6202A8E0C33467D3A0
Certainly Intermediate R1	Certainly Intermediate R1	575C09B07A001CA0EF6B3B1C5730BFAFEBC7AD9F56A009F1966C32F08E659713

The following certificates were signed by Starfield Technologies, Inc. for Certainly.

Root CA	Subject Common Name	SHA256 Fingerprint
Starfield Root Certificate Authority – G2	Certainly Intermediate E1	3379233C434610C8EAA9361ACBDD24C7D655409C6D680A8C2585FFDA27011EE7
Starfield Root Certificate Authority – G2	Certainly Intermediate R1	FEC41E32CA75C295A6240FA639D3ABE3BFB5CB131D6690E2331A176BED2E5BD2