



STARFIELD TECHNOLOGIES, LLC, A SUBSIDIARY OF  
GODADDY, INC.

WEBTRUST FOR CERTIFICATION AUTHORITIES  
SSL BASELINE REPORT

JULY 01, 2024, TO JUNE 30, 2025

Attestation and Compliance Services



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# TABLE OF CONTENTS

SECTION 1	INDEPENDENT ACCOUNTANT'S REPORT .....	1
SECTION 2	MANAGEMENT'S ASSERTION.....	6
APPENDIX A	STARFIELD'S ROOT, CROSS-SIGNED AND ISSUING CAs IN SCOPE FOR SSL BASELINE REQUIREMENTS .....	9

# SECTION I

## INDEPENDENT ACCOUNTANT'S REPORT

## REPORT OF THE INDEPENDENT ACCOUNTANT

To the Management of Starfield Technologies, LLC (“Starfield”):

### Scope

We have examined Starfield’s [management assertion](#) that for its Certification Authority (“CA”) operations at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, for its CAs as enumerated in Appendix A, Starfield has:

- disclosed its SSL certificate lifecycle management business practices in its
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.01, dated April 1, 2024](#); and
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.02, dated February 28, 2025](#)

including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the Starfield website, and provided such services in accordance with its disclosed practices

- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and SSL certificates it manages is established and protected throughout their lifecycles; and
  - SSL subscriber information is properly authenticated (for the registration activities performed by Starfield)
- 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 – SSL Baseline v2.8](#).

### Certification Authority’s Responsibilities

Starfield’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 SSL Baseline v2.8.

### Practitioner’s Responsibilities

Our responsibility is to express an opinion on Starfield 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 Starfield 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 Starfield’s services other than its Certification Authority operations at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, nor the suitability of any of Starfield’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	Does Not Provide a Method for Domain Owners to Revoke Their Certificates	Bugzilla #1924992: On October 16, 2024, GoDaddy was notified that GoDaddy CA (formerly Starfield) did not provide a method for domain owners to revoke their certificates.
2	Delayed CRL File Updates	GoDaddy disclosed in Bugzilla #1949895 that on 2/19/2025, GoDaddy identified an issue which prevented CRL updates from happening as expected. This bug started on 2/27/2025 04:00 UTC and was the result of a server level configuration change. The impact was 7,899 certificate revocations that were not updated on CRL files within 24 hours of their revocation which is a violation of Section 4.9.7 of the Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates which states that “CAs issuing Subscriber Certificates MUST update and publish a new CRL within twenty-four (24) hours after recording a Certificate as revoked.”  The issue was limited to CRL updates and was corrected on 2/19/2025 19:01 UTC. Certificate issuance was not impacted. A full incident report was made available on 2/28/2025.

Matter Topic		Matter Description
3	Delayed Revocation	Bugzilla #1942877: On January 21, 2025, GoDaddy received a problem report alerting them to a delayed revocation of 31 certificates reported to have compromised keys due to the Fortinet leak. The compromised certificates were first reported on 1/17/2025, however, the mail address did not accept emails with attachments. The user was then contacted by GoDaddy that afternoon requesting the affected keys to be sent to GoDaddy. The certificates and keys were immediately sent to GoDaddy. The following day, three additional certificates and keys were identified and sent to GoDaddy. The certificates were still not revoked as of 1/21/2025, the day the report was submitted.
4	Edge Case for Data Reuse Outside of Timeframes	GoDaddy disclosed in Bugzilla #1909948 that during a 3% audit conducted on 7/22/2024, a UCC certificate was uncovered that had used 2 prior completed domain validations which were older than 398 days at the time of issuance. This was a violation of Section 4.2.1 (Performing identification and authentication functions) of the Baseline Requirements which state that “For validation of Domain Names and IP Addresses according to Section 3.2.2.4 and 3.2.2.5, any data, document, or completed validation used MUST be obtained no more than 398 days prior to issuing the Certificate.” Upon discovery of the offending certificate, it was revoked on 7/23/2024 within the 24 hour timeframe specified in CAB 4.9.1.1 Reasons for Revoking a Subscriber Certificate (The CA obtains evidence that the validation of domain authorization or control for any Fully-Qualified Domain Name or IP address in the Certificate should not be relied upon (CRLReason #4, superseded).  As part of the investigation, GoDaddy uncovered a bug in their code on 7/24/2024, and deployed a fix to production on 7/25/2024, and analysis showed that the impact of the incident was limited to a specific set of edge-case conditions.
5	Revocation Process is Unusable Due to Contact Address Not Accepting Attachments	Bugzilla #1942241: On January 16, 2025, GoDaddy received a problem report alerting them unusable revocation process for reporting a large number of certificates with compromised keys. The compromised keys were first reported in an email with an attachment to ‘practices@starfieldtech.com.’ However, the mail address did not accept mail attachments. Alternate methods for submitting the compromised keys were attempted, including a tarball and a .zip file, however, the same response was received each time indicating that the mail address could not accept the attachment type.

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 Starfield 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 - SSL Baseline v2.8](#).

### **Use of the WebTrust seal**

Starfield's use of the WebTrust for Certification Authorities – SSL Baseline 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.

*S* **SHELLMAN & COMPANY, LLC**

Schellman & Company, LLC  
Tampa, Florida  
September 15, 2025

# SECTION 2

## MANAGEMENT'S ASSERTION



## MANAGEMENT'S ASSERTION

Starfield Technologies, LLC ("Starfield") operates the Certification Authority ("CA") services for its CA certificates as enumerated in Appendix A and provides SSL CA services.

The management of Starfield is responsible for establishing and maintaining effective controls over its SSL CA operations, its SSL CA business practices disclosure on its website, SSL key lifecycle management controls, and SSL 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 Starfield's Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Starfield management has assessed its disclosures of its certificate practices and controls over its SSL CA services. Based on that assessment, in providing its SSL CA services at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, Starfield has:

- disclosed its SSL certificate lifecycle management business practices in its:
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.01, dated April 1, 2024](#); and
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.02, dated February 28, 2025](#)

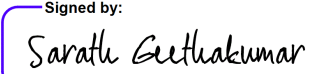
including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the Starfield website, and provided such services in accordance with its disclosed practices

- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and SSL certificates it manages is established and protected throughout their lifecycles; and
  - SSL subscriber information is properly authenticated (for the registration activities performed by Starfield)
- 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 – SSL Baseline v2.8](#).

GoDaddy 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
<a href="#">1924992</a>	Does Not Provide a Method for Domain Owners to Revoke Their Certificates	10/16/2024	4/2/2025	Closed
<a href="#">1949895</a>	Delayed CRL File Updates	2/21/2025	5/8/2025	Closed
<a href="#">1942877</a>	Delayed Revocation	1/21/2025	5/8/2025	Closed
<a href="#">1909948</a>	Edge Case for Data Reuse Outside of Timeframes	7/25/2024	10/31/2024	Closed
<a href="#">1942241</a>	Revocation Process is Unusable Due to Contact Address Not Accepting Attachments	1/16/2025	5/8/2025	Closed

Signed by:

  
C9935F2693094EA  
Sarath Geethakumar  
Chief Information Security Officer  
Starfield Technologies, LLC  
September 15, 2025

# APPENDIX A

## **STARFIELD'S ROOT, CROSS-SIGNED, AND ISSUING CAs IN SCOPE FOR SSL BASELINE REQUIREMENTS**

## STARFIELD'S ROOT CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Class 2 Certification Authority	Not applicable.	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4
Go Daddy Root Certificate Authority - G2	Go Daddy Root Certificate Authority - G2	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA
Starfield Class 2 Certification Authority	Not applicable.	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658
Starfield Root Certificate Authority - G2	Starfield Root Certificate Authority - G2	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5
Starfield Services Root Certificate Authority	Starfield Services Root Certificate Authority	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E
Starfield Root Certificate Authority - G5	Starfield Root Certificate Authority - G5	414F6C10FA816561832751BDB241ED8AE2BB0E2EBE651DE48E317ABB774E38F0
Starfield Root Certificate Authority - G6	Starfield Root Certificate Authority - G6	FDB2C428AC393FD61B386497E0CC6652D71F35F6683C8E0AD0E754CF8F133D2A
GoDaddy Root Certificate Authority - G5	GoDaddy Root Certificate Authority - G5	E0562C0CD4CD5959DB2AB9D8E7426B248FD75534F5D50CFAF8CB312239F93086
GoDaddy Root Certificate Authority - G6	GoDaddy Root Certificate Authority - G6	DB3C05E9C55D5259B057474D7F7F3E54A2A51AFAA71EC5C41D8C3CBE68108799

## STARFIELD'S CROSS-SIGNED CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Class 2 Certification Authority	Go Daddy Root Certificate Authority - G2	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74D7A7E6ECB
Go Daddy Class 2 Certification Authority	Go Daddy Root Certificate Authority - G2	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB
Starfield Class 2 Certification Authority	Starfield Root Certification Authority - G2	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC
Starfield Class 2 Certification Authority	Starfield Root Certification Authority - G2	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C

Root CA	Subject Common Name	SHA256 Fingerprint
Starfield Class 2 Certification Authority	Starfield Services Root Certificate Authority - G2	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA
Starfield Class 2 Certification Authority	Starfield Services Root Certificate Authority - G2	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996
Go Daddy Root Certificate Authority - G2	GoDaddy Secure Certificate Authority - G5	880FBC44FE71AA1BE40DB130917B1BAEC1BD889B2B3D7478EDA04728667E8B44
Starfield Root Certificate Authority - G2	Starfield Secure Certificate Authority - G5	29E502995310403685DD6258F9D04856878963042D4749C6D5D9773A310C31C0

### STARFIELD'S ISSUING CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Root Certificate Authority - G2	Go Daddy Secure Certificate Authority - G2	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6
Go Daddy Class 2 Certification Authority	Go Daddy Secure Certification Authority	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3
Starfield Root Certificate Authority - G2	Starfield Secure Certificate Authority - G2	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72
Starfield Class 2 Certification Authority	Starfield Secure Certification Authority	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030