



REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of CommScope, Inc. (“CommScope”):

Scope

We have examined CommScope management’s [assertion](#) that for its Certification Authority (“CA”) operations at San Diego, California, and Horsham, Pennsylvania, in the United States of America, for its CAs as enumerated in [Attachment B](#) in scope for SSL Baseline Requirements, CommScope has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of its CommScope Certificate Policy and Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#), including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on its [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
- 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 1, 2023 to June 30, 2024 based on the [WebTrust Principles and Criteria for Certification Authorities - SSL Baseline v2.8](#).

The CA/Browser Forum Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates requires compliance with the Network and Certificate System Security Requirements (“Network Security Requirements”) as set forth by the CA/Browser Forum. The relevant principle and criteria are included as part of WebTrust Principles and Criteria for Certification Authorities - Network Security, which are reported on under separate cover.

Certification Authority’s Responsibilities

CommScope’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](#).



Independent Accountant's Responsibilities

Our responsibility is to express an opinion on 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. 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 judgement, 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 relevant ethical requirements relating to the engagement.

The relative effectiveness and significance of specific controls at CommScope 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 unauthorized 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.

Independent Accountant's 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 CommScope's services other than its CA operations at San Diego, California, and Horsham, Pennsylvania, in the United States of America, nor the suitability of any of CommScope's services for any customer's intended purpose.



Other Matter

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

Matter Topic		Matter Description
1	Certificate Content	CommScope disclosed in Mozilla Bug #1852404 that they had issued subscriber certificates which had not been entered into any CT logs, and were issued with empty SCTList extensions.
2	Certificate Revocation	CommScope disclosed in Mozilla Bug #1859812 that one of the test web pages with subscriber certificates that chained up to one of their publicly trusted roots had a certificate that was intended to be revoked, but was not.

While the CommScope assertion notes all issues disclosed on Bugzilla from July 1, 2023 through the date of this report, we have only noted those instances relevant to the CAs enumerated in [Attachment B](#) and applicable to the [WebTrust Principles and Criteria for Certification Authorities - SSL Baseline - Version 2.8](#).

Use of the WebTrust Seal

CommScope's use of the WebTrust for Certification Authorities - SSL Baseline Requirements 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.

BDO USA

September 25, 2024



**ATTACHMENT A - CERTIFICATE POLICY/CERTIFICATION PRACTICE STATEMENT
VERSIONS IN-SCOPE**

Policy Name	Version	Effective Date
CommScope Certificate Policy and Certificate Practice Statement	Version 2.6	February 10, 2023
CommScope Certificate Policy and Certificate Practice Statement	Version 2.7	September 8, 2023
<u>CommScope Certificate Policy and Certificate Practice Statement</u>	Version 2.8	February 14, 2024



ATTACHMENT B - IN SCOPE CA CERTIFICATES

Root CA Certificates			
CA Name	SHA2 Thumbprint	Valid From	Valid To
CN = CommScope Public Trust RSA Root-01 O = CommScope C = US	02BDF96E2A45DD9BF18FC7E1DBDF21A0379BA3C9C2610344CFD8D606FEC1ED81	4/28/2021	4/28/2046
CN = CommScope Public Trust RSA Root-02 O = CommScope C = US	FFE943D793424B4F7C440C1C3D648D5363F34B82DC87AA7A9F118FC5DEE101F1	4/28/2021	4/28/2046
CN = CommScope Public Trust ECC Root-01 O = CommScope C = US	11437CDA7BB45E41365F45B39A38986B0DE00DEF348E0C7BB0873633800BC38B	4/28/2021	4/28/2046
CN = CommScope Public Trust ECC Root-02 O = CommScope C = US	2FFB7F813BBB3C89AB4E8162D0F16D71509A830CC9D73C262E5140875D1AD4A	4/28/2021	4/28/2046

Subordinate CA Certificates			
CA Name	SHA2 Thumbprint	Valid From	Valid To
CN = CommScope Public Trust RSA Sub-CA-01-01 O = CommScope C = US	1380EED66B2C316612D5F6E7EF68C2D3460582FEA94E00C6C27595F91934E3D9	4/30/2021	4/30/2046
CN = CommScope Public Trust RSA Sub-CA-01-02 O = CommScope C = US	0215311BC182D59718822B45DDF10213CE2661A93C3C2D203DEC6567DE44AE3C	4/30/2021	4/30/2046
CN = CommScope Public Trust RSA Sub-CA-02-01 O = CommScope C = US	840E8DD1DFC9C0C50D29CA8512991CF2ED7DCDDF12410375FD0A5D47F8FBF576	4/30/2021	4/30/2046
CN = CommScope Public Trust ECC Sub-CA-01-01 O = CommScope C = US	EB89D3087D76912D7616AC99C73BAEBAC1FB8E4835F8BA15B543F7344A4C57F1	4/30/2021	4/30/2046
CN = CommScope Public Trust ECC Sub-CA-01-02 O = CommScope C = US	81473E1B18A688776881841B3AE160B2AD935CE9E8D5832B8A26256448DB7379	4/30/2021	4/30/2046
CN = CommScope Public Trust ECC Sub-CA-02-01 O = CommScope C = US	598D21250DC4002FD7F1FC0EF530633D4B1687D8597C0A7A86FDB0E8D70A404B	4/30/2021	4/30/2046



COMMScope, INC. MANAGEMENT'S ASSERTION

CommScope, Inc. ("CommScope") operates the Certification Authority ("CA") services for its CAs as enumerated in [Attachment B](#) in scope for SSL Baseline Requirements and provides SSL CA services.

CommScope 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 San Diego, California, and Horsham, Pennsylvania, in the United States of America, CommScope has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of its CommScope Certificate Policy and Certification Practice Statement ("CP/CPS") enumerated in [Attachment A](#), including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on its [website](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
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- maintained effective controls to provide reasonable assurance that:
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 - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

throughout the period July 1, 2023 to June 30, 2024 based on the [WebTrust Principles and Criteria for Certification Authorities - SSL Baseline v2.8](#)

CommScope has disclosed the following matters publicly on Mozilla Bugzilla's platform. These matters were included below due to being open during the period July 1, 2023 through the date of this report.



Bug ID	Summary	Opened	Closed	Resolution
1852404	CommScope: Empty SCT extensions in certificates	9/09/2023	9/22/2023	FIXED
1859812	CommScope: Certificate not revoked as it was supposed to be	10/18/2023	3/6/2024	FIXED
1901578	CommScope: Certificates were issued in which third-party web-based tools were used during validation.	6/10/2024	7/28/2024	FIXED
1904399	CommScope: OCSP responses contain issuer certificate	6/24/2024	8/17/2024	INVALID
1904402	CommScope: Incomplete Incident Report	6/24/2024	----	OPEN
1910512	CommScope: Certificates not logged in CT logs as stated in CP/CPS	7/29/2024	----	OPEN

Signed by:



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Craig Coogan

VP and General Manager, CommScope

9/25/2024



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CN = CommScope Public Trust ECC Root-01 O = CommScope C = US	11437CDA7BB45E41365F45B39A38986B0DE00DEF348E0C7BB0873633800BC38B	4/28/2021	4/28/2046
CN = CommScope Public Trust ECC Root-02 O = CommScope C = US	2FFB7F813BBB3C89AB4E8162D0F16D71509A830CC9D73C262E5140875D1AD4A	4/28/2021	4/28/2046

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CN = CommScope Public Trust RSA Sub-CA-01-02 O = CommScope C = US	0215311BC182D59718822B45DDF10213CE2661A93C3C2D203DEC6567DE44AE3C	4/30/2021	4/30/2046
CN = CommScope Public Trust RSA Sub-CA-02-01 O = CommScope C = US	840E8DD1DFC9C0C50D29CA8512991CF2ED7DCDDF12410375FD0A5D47F8FBF576	4/30/2021	4/30/2046
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CN = CommScope Public Trust ECC Sub-CA-01-02 O = CommScope C = US	81473E1B18A688776881841B3AE160B2AD935CE9E8D5832B8A26256448DB7379	4/30/2021	4/30/2046
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