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## 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 enumerated in [Attachment B](#), CommScope has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its CommScope Certificate Policy and Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that CommScope provides its services in accordance with its CP/CPS
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles; and
  - 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 v2.2.2](#).

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

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BDO is the brand name for the BDO network and for each of the BDO Member Firms.



## **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 v2.2.2](#).

## **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 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 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 <a href="#">#1852404</a> 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 <a href="#">#1859812</a> 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.
3	Certificate Transparency Logging	CommScope disclosed in Mozilla Bug <a href="#">#1910512</a> that they had issued subscriber certificates which had not been entered into any CT logs.

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 v2.2.2](#).

## Use of the WebTrust Seal

CommScope'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.

BDO USA

September 25, 2024



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

<b>Policy Name</b>	<b>Version</b>	<b>Effective Date</b>
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
<a href="#">CommScope Certificate Policy and Certificate Practice Statement</a>	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 enumerated in [Attachment B](#) and provides the following CA services:

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

The management of CommScope is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosure 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 CommScope's CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

CommScope management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in CommScope management's opinion, in providing its CA services at San Diego, California, and Horsham, Pennsylvania, in the United States of America, CommScope has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its CommScope Certificate Policy and Certification Practice Statement ("CP/CPS") enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that it provides its services in accordance with its CP/CPS
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles; and
  - 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 [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#), including the following:

#### **CA Business Practices Disclosure**

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

#### **CA Business Practices Management**

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

#### **CA Environmental Controls**

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

#### **CA 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

#### **Subscriber Key Lifecycle Management Controls**

- Requirements for Subscriber Key Management



Certificate Lifecycle Management Controls

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

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

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

Signed by:



A1CE8063B9E2475...

Craig Coogan

VP and General Manager, CommScope

9/25/2024





**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
<a href="#">CommScope Certificate Policy and Certificate Practice Statement</a>	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



## 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 CA enumerated in [Attachment B](#), CommScope has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its CommScope Certificate Policy and Certification Practice Statement ("CP/CPS") enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that CommScope provides its services in accordance with its CP/CPS
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles; and
  - subscriber information is properly authenticated (for the registration activities performed by CommScope)
- 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 v2.2.2](#).

CommScope makes use of external registration authorities for specific subscriber registration activities as disclosed in CommScope's business practices. Our examination did not extend to the controls exercised by these external registration authorities.

CommScope does not escrow its CA keys, provide subscriber key recovery, provide integrated circuit card lifecycle management for subscribers, or certificate suspension services. CommScope does not provide subordinate CA certificate lifecycle management services to third-parties. Accordingly, our examination did not extend to controls that would address those criteria.



### **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 v2.2.2](#).

### **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 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 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	Audit Logging	For one (1) out of one (1) new onboarded organizations selected for testing, CommScope did not retain vetting evidence that corporate contacts did not appear on the Miller Smiles List and that the client's FRN number was verified in the Federal Communications Commission website.

#### Use of the WebTrust Seal

CommScope'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.

BDO USA

September 25, 2024



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

<b>Policy Name</b>	<b>Version</b>	<b>Effective Date</b>
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
<a href="#"><u>CommScope Certificate Policy and Certificate Practice Statement</u></a>	Version 2.8	February 14, 2024



## ATTACHMENT B - IN-SCOPE CA CERTIFICATES

### CableLabs CA Certificates

Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = CableLabs Mfg CA OU = CA00001 - G4 L = Louisville S = Colorado O = CableLabs C = US	39 cc 8b 0b 7d 37 3c 79 c0 b1 2d 3b 8d 17 9a d2	e9 16 d1 9b ea 35 e2 11 1a bc 2d 32 98 a4 66 d0 a8 79 73 dc	90 a0 65 a5 0a 3e d9 59 a1 be 6f b8 2a b4 51 6d ba 62 67 37 2d c9 49 a4 b3 85 51 44 0f a1 34 d1	5/14/2018	5/14/2038
CN = CableLabs Mfg CA OU = CA00006 - G4 L = Louisville S = Colorado O = CableLabs C = US	64 3c b8 c7 75 5e 70 26 ff a7 69 05 f0 e9 02 75	6e 97 87 be 7c 0b a0 b4 63 5b 15 70 cd 5f c1 53 24 cc 97 1b	bc 6a 87 2d c8 77 38 03 73 6c 8c 9f d1 8c 42 8a 67 a5 3e fe 82 b6 3a 71 4c 0d f0 86 79 4a 6d 30	5/14/2018	5/14/2038
CN = CableLabs Device Certification Authority OU = Device CA03 - G4 O = CableLabs C = US	14 80 41 3d 21 fe be 8d 24 c5 74 a8 2c 4a fd 83	da d6 51 ef d5 61 80 98 dc 21 29 a2 bf 5a 34 7e 6f ab b0 59	cd d0 91 67 3a 15 ae 00 96 6f 8c b0 e5 38 0d 10 4d 91 65 61 42 05 a6 61 7c 2e 1e ea 4f 06 4e 39	11/5/2018	11/5/2053
CN = CableLabs Mfg CA OU = CA00008 - G3 L = Louisville S = Colorado O = CableLabs C = US	4a 8f 82 e7 d0 71 47 c7 3a b3 5d 92 08 ab 56 d8	61 bc ff 46 44 65 81 8b 70 14 07 41 1b f9 3a a3 55 0b fe 47	cf 9d 53 db a3 eb 8b d9 a2 2c 9f b6 1a 24 3d ab c9 06 43 37 0d d2 e1 12 c5 9e 98 e4 bb ed 8d b0	11/5/2018	11/5/2038
CN = CableLabs Device Certification Authority OU = Device CA07 O = CableLabs C = US	3d 2a 18 30 72 7f 49 28 1a da 83 89 d3 6b 4a 3b	69 a1 c5 d0 cd bc f8 d4 47 31 63 7c e5 40 54 19 e6 08 82 fd	c2 5a 88 de 2b 39 3b f7 68 2d a5 73 bc 5a 99 0d e4 f9 dd 86 9f ae 27 8a 9d b0 f8 32 38 7c e6 11	2/21/2023	2/21/2053



#### WinnForum Insta CA certificate

Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum RSA CBSD Mfr CA OU = RSA CBSD Mfr CA0002 O = ARRIS Group, Inc. C = US	65 ce	46 b5 55 c2 b5 ce 7e 00 79 ba cb 93 f3 0d ac a5 c0 0e 9e b2	b4 39 85 12 de 76 e7 08 38 98 c1 cf 71 12 50 97 5d a4 64 8c 5e ae 50 f6 90 20 c4 9c 32 1a fd d3	6/25/2018	6/25/2048

#### WinnForum CommScope CA certificates

Root CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum ECC Root CA OU = ECC Root CA0004 O = WinnForum C = US	63 77 52 f4 74 96 a0 41 cb f7 ca 4a 1e 6c 24 d4 83 84 23 80	99 ea d1 ac 2c f8 26 e7 40 71 50 74 ce 46 85 18 3c 6b b5 5b	76 b7 ce 8a 8b 22 ca 90 60 98 ef 31 23 09 f2 8e 04 c0 d5 cd 0a ed 17 fe 46 00 84 6f 90 fa 21 7b	11/21/2019	11/21/2069
CN=WinnForum RSA Root CA OU=RSA Root CA0004 O=WinnForum C=US	73 64 da e9 e5 39 13 19 75 ba ba 91 9c c1 4f 2b 2e be 4c 71	13 83 e8 58 c1 11 cd 51 00 97 47 a8 cc d3 57 49 63 6c 63 88	e5 dd 57 ac b0 ed 9b 80 2f 75 79 95 a2 8f 02 bc 6a 5f f2 db 76 86 ee c5 1f 0c fe 08 f2 33 58 72	11/21/2019	11/21/2069

Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum RSA SAS Provider CA OU = RSA SAS Provider CA0001 O = ARRIS Solutions, Inc. C = US	06 49 3b 8d 0e 16 62 75 07 4a 0f f4 61 96 76 00 7f dd a3 d6	d8 59 ca 91 eb 76 f3 ee a8 a2 fd 41 fe c7 f9 78 6b f5 16 9c	4b d0 57 16 5a 8c c0 90 7d bc d5 56 3e 65 2f 9a ca bf 11 36 5d f4 3e e1 64 9f 9c 34 4d 68 cd 3b	11/21/2019	11/21/2049
CN = WinnForum RSA Professional Installer CA OU = RSA Professional Installer CA0001 O = ARRIS Solutions, Inc. C = US	5b 00 d6 a0 a2 f0 c7 74 a7 f4 df a9 6e 9c cb fc 62 9b 06 20	d6 d4 47 e0 aa 19 0b 1c a7 78 6f fd 2f de b4 0d ae 84 85 ce	e5 5b 56 e8 35 96 a2 54 2e 2d b5 38 65 21 de 83 e3 77 8b 46 9b b5 86 4d d0 fe cc 73 8f 69 73 bd	11/21/2019	11/21/2049





Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum RSA CBSD Mfr CA OU = RSA CBSD Mfr CA0001 O = ARRIS Solutions, Inc. C = US	3a 5e c4 a5 7e c8 50 4d 25 4c 69 43 06 79 7e fd 21 73 8a 1f	25 61 62 49 3f 1d e3 24 a0 90 fd fd f5 d9 4f a9 4b 49 17 ac	ff e9 de b8 01 68 e4 b3 48 54 0b 87 ff 8b 03 ea ef e7 2b ad 8c 4e c0 0b 3c 43 19 a0 16 cb d8 6a	11/21/2019	11/21/2049
CN = WinnForum RSA Domain Proxy CA OU = RSA Domain Proxy CA0001 O = ARRIS Solutions, Inc. C = US	4a 6a 5e ce 1e 1d a8 a4 09 b6 07 6e 5d 0d f1 84 fb 48 ce d1	66 3a 6f c1 d1 e1 52 e1 f4 de a0 5c 9c ae bc 60 a1 be 42 3e	8e 80 bd b0 f9 ca 81 35 bf 7b d0 1b ba 77 d0 00 bc b8 88 af 3b 38 f7 85 5a 9f 86 a4 11 d6 83 b9	8/6/2020	8/6/2050

#### CSA IoT Matter CA Certificates

Root CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = CommScope Technologies LLC Matter PAA	5c 21 a8 f6 46 fa 20 0b 93 6d cf be d0 83 48 2a 84 4d 76 69	fc 7e 5c 5c f4 7f 37 7f 49 b6 15 db 01 2c 36 9c 35 cf 76 9d	07 de 36 6a 41 fe 51 71 58 eb 7f 65 02 ff 53 27 6e 75 a0 bc 46 dc 1e 30 2f f6 53 a0 f4 75 d0 21	3/27/2023	6/5/2079



## COMMScope, INC. MANAGEMENT'S ASSERTION

CommScope, Inc. ("CommScope") operates the Certification Authority ("CA") services for its 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
- Subscriber key generation

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

CommScope management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in CommScope management's opinion, in providing its CA services at San Diego, California, and Horsham, Pennsylvania, in the United States of America, CommScope has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its CommScope Certificate Policy and Certification Practice Statement ("CP/CPS") enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that CommScope provides its services in accordance its CP/CPS
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles; and
  - subscriber information is properly authenticated (for the registration activities performed by CommScope)
- 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 v2.2.2](#), including the following:

#### **CA Business Practices Disclosure**

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

#### **CA Business Practices Management**

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

#### **CA Environmental Controls**

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and 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

#### **Subscriber Key Lifecycle Management Controls**

- CA-Provided Subscriber Key Generation Services
- Requirements for Subscriber Key Management



## Certificate Lifecycle Management Controls

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

CommScope does not escrow its CA keys, provide subscriber key recovery, provide integrated circuit card lifecycle management for subscribers, or certificate suspension services. CommScope does not provide subordinate CA certificate lifecycle management services to third parties. Accordingly, our assertion does not extend to controls that would address those criteria.

Signed by:  
  
A1CE8063B9E2475...

9/25/2024

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Craig Coogan  
VP and General Manager, CommScope



**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
<a href="#">CommScope Certificate Policy and Certificate Practice Statement</a>	Version 2.8	February 14, 2024



## ATTACHMENT B - IN-SCOPE CA CERTIFICATES

### CableLabs CA Certificates

Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = CableLabs Mfg CA OU = CA00001 - G4 L = Louisville S = Colorado O = CableLabs C = US	39 cc 8b 0b 7d 37 3c 79 c0 b1 2d 3b 8d 17 9a d2	e9 16 d1 9b ea 35 e2 11 1a bc 2d 32 98 a4 66 d0 a8 79 73 dc	90 a0 65 a5 0a 3e d9 59 a1 be 6f b8 2a b4 51 6d ba 62 67 37 2d c9 49 a4 b3 85 51 44 0f a1 34 d1	5/14/2018	5/14/2038
CN = CableLabs Mfg CA OU = CA00006 - G4 L = Louisville S = Colorado O = CableLabs C = US	64 3c b8 c7 75 5e 70 26 ff a7 69 05 f0 e9 02 75	6e 97 87 be 7c 0b a0 b4 63 5b 15 70 cd 5f c1 53 24 cc 97 1b	bc 6a 87 2d c8 77 38 03 73 6c 8c 9f d1 8c 42 8a 67 a5 3e fe 82 b6 3a 71 4c 0d f0 86 79 4a 6d 30	5/14/2018	5/14/2038
CN = CableLabs Device Certification Authority OU = Device CA03 - G4 O = CableLabs C = US	14 80 41 3d 21 fe be 8d 24 c5 74 a8 2c 4a fd 83	da d6 51 ef d5 61 80 98 dc 21 29 a2 bf 5a 34 7e 6f ab b0 59	cd d0 91 67 3a 15 ae 00 96 6f 8c b0 e5 38 0d 10 4d 91 65 61 42 05 a6 61 7c 2e 1e ea 4f 06 4e 39	11/5/2018	11/5/2053
CN = CableLabs Mfg CA OU = CA00008 - G3 L = Louisville S = Colorado O = CableLabs C = US	4a 8f 82 e7 d0 71 47 c7 3a b3 5d 92 08 ab 56 d8	61 bc ff 46 44 65 81 8b 70 14 07 41 1b f9 3a a3 55 0b fe 47	cf 9d 53 db a3 eb 8b d9 a2 2c 9f b6 1a 24 3d ab c9 06 43 37 0d d2 e1 12 c5 9e 98 e4 bb ed 8d b0	11/5/2018	11/5/2038
CN = CableLabs Device Certification Authority OU = Device CA07 O = CableLabs C = US	3d 2a 18 30 72 7f 49 28 1a da 83 89 d3 6b 4a 3b	69 a1 c5 d0 cd bc f8 d4 47 31 63 7c e5 40 54 19 e6 08 82 fd	c2 5a 88 de 2b 39 3b f7 68 2d a5 73 bc 5a 99 0d e4 f9 dd 86 9f ae 27 8a 9d b0 f8 32 38 7c e6 11	2/21/2023	2/21/2053


**WinnForum Insta CA certificate**

Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum RSA CBSD Mfr CA OU = RSA CBSD Mfr CA0002 O = ARRIS Group, Inc. C = US	65 ce	46 b5 55 c2 b5 ce 7e 00 79 ba cb 93 f3 0d ac a5 c0 0e 9e b2	b4 39 85 12 de 76 e7 08 38 98 c1 cf 71 12 50 97 5d a4 64 8c 5e ae 50 f6 90 20 c4 9c 32 1a fd d3	6/25/2018	6/25/2048

**WinnForum CommScope CA certificates**

Root CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum ECC Root CA OU = ECC Root CA0004 O = WinnForum C = US	63 77 52 f4 74 96 a0 41 cb f7 ca 4a 1e 6c 24 d4 83 84 23 80	99 ea d1 ac 2c f8 26 e7 40 71 50 74 ce 46 85 18 3c 6b b5 5b	76 b7 ce 8a 8b 22 ca 90 60 98 ef 31 23 09 f2 8e 04 c0 d5 cd 0a ed 17 fe 46 00 84 6f 90 fa 21 7b	11/21/2019	11/21/2069
CN=WinnForum RSA Root CA OU=RSA Root CA0004 O=WinnForum C=US	73 64 da e9 e5 39 13 19 75 ba ba 91 9c c1 4f 2b 2e be 4c 71	13 83 e8 58 c1 11 cd 51 00 97 47 a8 cc d3 57 49 63 6c 63 88	e5 dd 57 ac b0 ed 9b 80 2f 75 79 95 a2 8f 02 bc 6a 5f f2 db 76 86 ee c5 1f 0c fe 08 f2 33 58 72	11/21/2019	11/21/2069

Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum RSA SAS Provider CA OU = RSA SAS Provider CA0001 O = ARRIS Solutions, Inc. C = US	06 49 3b 8d 0e 16 62 75 07 4a 0f f4 61 96 76 00 7f dd a3 d6	d8 59 ca 91 eb 76 f3 ee a8 a2 fd 41 fe c7 f9 78 6b f5 16 9c	4b d0 57 16 5a 8c c0 90 7d bc d5 56 3e 65 2f 9a ca bf 11 36 5d f4 3e e1 64 9f 9c 34 4d 68 cd 3b	11/21/2019	11/21/2049
CN = WinnForum RSA Professional Installer CA OU = RSA Professional Installer CA0001 O = ARRIS Solutions, Inc. C = US	5b 00 d6 a0 a2 f0 c7 74 a7 f4 df a9 6e 9c cb fc 62 9b 06 20	d6 d4 47 e0 aa 19 0b 1c a7 78 6f fd 2f de b4 0d ae 84 85 ce	e5 5b 56 e8 35 96 a2 54 2e 2d b5 38 65 21 de 83 e3 77 8b 46 9b b5 86 4d d0 fe cc 73 8f 69 73 bd	11/21/2019	11/21/2049



Issuing CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = WinnForum RSA CBSD Mfr CA OU = RSA CBSD Mfr CA0001 O = ARRIS Solutions, Inc. C = US	3a 5e c4 a5 7e c8 50 4d 25 4c 69 43 06 79 7e fd 21 73 8a 1f	25 61 62 49 3f 1d e3 24 a0 90 fd fd f5 d9 4f a9 4b 49 17 ac	ff e9 de b8 01 68 e4 b3 48 54 0b 87 ff 8b 03 ea ef e7 2b ad 8c 4e c0 0b 3c 43 19 a0 16 cb d8 6a	11/21/2019	11/21/2049
CN = WinnForum RSA Domain Proxy CA OU = RSA Domain Proxy CA0001 O = ARRIS Solutions, Inc. C = US	4a 6a 5e ce 1e 1d a8 a4 09 b6 07 6e 5d 0d f1 84 fb 48 ce d1	66 3a 6f c1 d1 e1 52 e1 f4 de a0 5c 9c ae bc 60 a1 be 42 3e	8e 80 bd b0 f9 ca 81 35 bf 7b d0 1b ba 77 d0 00 bc b8 88 af 3b 38 f7 85 5a 9f 86 a4 11 d6 83 b9	8/6/2020	8/6/2050

#### CSA IoT Matter CA Certificates

Root CA Subject DN	Serial Number	SHA1 Thumbprint	SHA2 Thumbprint	Valid From	Valid To
CN = CommScope Technologies LLC Matter PAA	5c 21 a8 f6 46 fa 20 0b 93 6d cf be d0 83 48 2a 84 4d 76 69	fc 7e 5c 5c f4 7f 37 7f 49 b6 15 db 01 2c 36 9c 35 cf 76 9d	07 de 36 6a 41 fe 51 71 58 eb 7f 65 02 ff 53 27 6e 75 a0 bc 46 dc 1e 30 2f f6 53 a0 f4 75 d0 21	3/27/2023	6/5/2079