

# Larry Clinton President Internet Security Alliance

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### Larry Clinton President ISA

- •Former Academic came to DC in mid-80s
- Legislative Director for Chair Congressional Internet Committee
- •12 years w/USTA including rewrite of telecommunications law & WIPO
- •Joined ISA in 2002 w/former Chair Congressional Intelligence Committee
- •Written numerous articles on Info Security, edited Journals, testify before Congress, electronic and print media
- •Boards: US Congressional I-net Caucus I-Net Education foundation, Cyber Security Partnership, DHS IT and Telecom Sector Coordinating Committee, CIPAC, CSCSWG



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### Core Principles



- 1. The Internet Changes Everything
- 2. Cyber Security is not an "IT" issue
- 3. Government and industry must rethink and evolve new roles, responsibilities and practices to create a sustainable system of cyber security



## ISAlliance Mission Statement

ISA seeks to integrate advancements in technology with pragmatic business needs and enlightened public policy to create a sustainable system of cyber security.



### **Our Partners**









































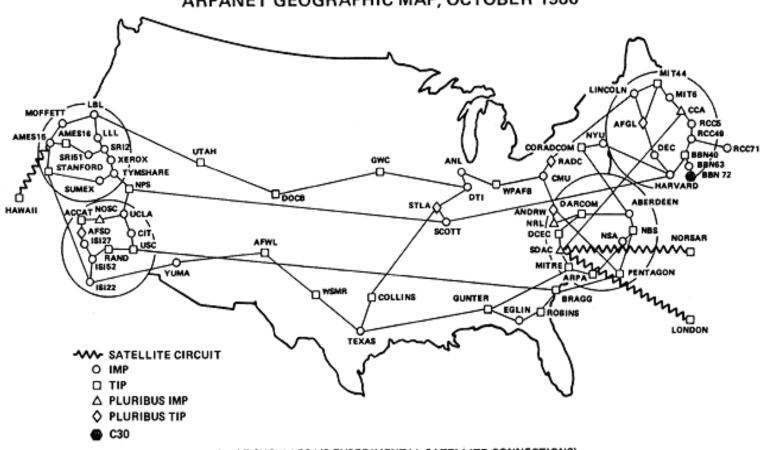






### The Old Web

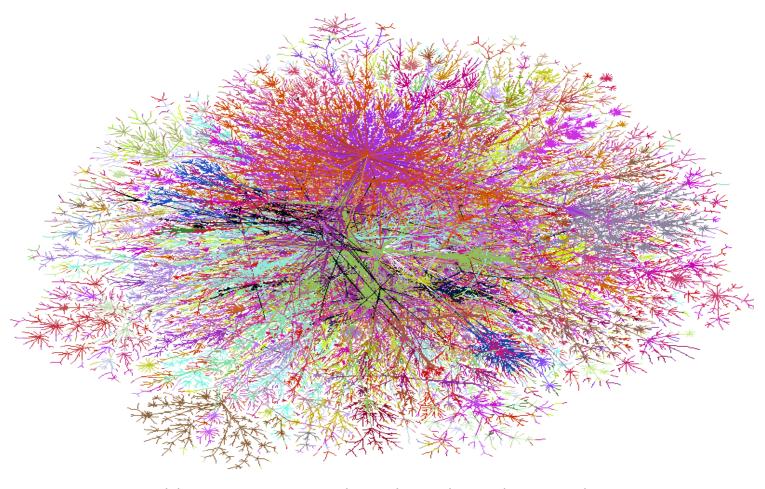
#### ARPANET GEOGRAPHIC MAP, OCTOBER 1980



(NOTE: THIS MAP DOES NOT SHOW ARPA'S EXPERIMENTAL SATELLITE CONNECTIONS)
NAMES SHOWN ARE IMP NAMES, NOT (NECESSARILY) HOST NAMES



### The Web Today



Source: http://cm.bell-labs.com/who/ches/map/gallery/index.html



## ISA 2009 Priority Projects

- Develop a model for an effective public private partnership (Cyber Social Contract)
- Develop pragmatic program for addressing financial cyber risks
- Framework on IT supply chain
- Standards for unified communications platforms
- Handbook for navigating outdated laws



#### **Business Services**

- Integrating Information Security into the Business Plan (NASDAQ Conference)
- ISAlliance Integrated Security Services Program

E-Discovery

Outsourcing Risk Management

Security Breach Notification

Security Incident Handling

Auditing

- High Profile Speaking and Article Placements
- Preventing and Detecting Insider Threats
- · Best Practices Development

Senior Managers Guide to Cyber Security

Small Businesses Guide to Cyber Security

Home Users & Mobile Executive Guide

- Cyber Insurance Discount Program for Best Practice Compliance (up to 15%)
- Exclusive Annual Privacy Policy Trends Report
- Contracting for Information Security, Model Commercial Agreements Guides
- IT Risk Management Quarterly Work Group

#### Technical Services

- Weekly Webinars from Carnegie Mellon University on Emerging Info Security issues
- Continuing Education Credit Program in Information Security
- ISAlliance/ANSI Model Terms for Certified ISMS featuring ISO/IEC 27001
- ISAlliance/ANSI Model Commercial Agreements featuring ISO/IEC 17799
- ISAlliance/ISSA Guide to Model Terms for Commercial Agreements
- SQUARE Methodology and Tool
- Online Assessment Tools and Insurance Discounts
- Exclusive Annual Software Assurance Report
- Participation in Critical Infrastructure Protection Planning with U.S. DHS
- Placement of Membership Articles in Professional Journals

Fixing Cyber Security Problems

 Daily Threat and Vulnerability Briefings from US-CERT

#### **Legal & Policy Services**

- Comprehensive Solutions for E-Discovery
- Interaction with Senior Policy Makers

Congress

Department of Homeland Security

US Department of Commerce Economic Security Working Group

National Infrastructure Protection
 Plan

IT Sector Coordinating Council

 Member Speaking & Writing Opportunities

Cutter IT Journal

 Market Incentives for Cyber Security

> Market Incentives White Paper

· Congressional Staff Briefings

Defense Issues

IT & Telecommunications
Issues

Insider Threats

International Issues

- Exclusive Annual Privacy Policy Trends Report
- · Privacy Quarterly Work Group



### Post 9-11 Cyber Security Policy

- National Strategy to Secure Cyber Space
- DIB Effort
- Comprehensive National Cyber Initiative (CNCI)
- CSIS and ISA Proposals to Obama/ Congress
- 60-day review & Obama Speech (5/29/09)



## National Strategy to Secure Cyber Space (2002-03)

- First comprehensive Administration view of problem
- Raised many key issues
- Predicted market forces would adequately motivate private sector
- General lack of follow through by USG



### DIB program

- DoD agrees to:
  - Provide classified tips and analysis on threat actors
  - Distribute attributed data from DoD and other industry partners
  - Protect data attributable to specific companies
  - Provide selected forensic support
- ~30 cleared defense contractors agree to:
  - Report compromised computers to DoD
  - Provide analysis of information exposed
  - Provide forensic image of computer if requested
  - Participate in formal Damage Assessment run by DoD acquisition community



### Releasing the Cyber Security Social Contract

November, 2008





## ISA Cyber Social Contract

- Similar to the agreement that led to public utility infrastructure dissemination in 20<sup>th</sup> C
- Infrastructure develop -- market incentives
- Consumer protection through regulation
- Gov role is more creative—harder —motivate, not mandate, compliance
- Industry role is to develop practices and standards and implement them

The Cyber Security Social Contract Policy Recommendations

for the

**Obama Administration** 

111th Congress



A Twenty-First Century Model for Protecting and Defending Critical Technology Systems and Information



#### Obama speaks on cyber security

### **Presidential Priority**

"My administration will pursue a new comprehensive approach to securing America's digital infrastructure. This new approach **starts at the top** with this **commitment from me**: From now on, our digital infrastructure – the networks and computers we depend on every day – will be treated as they should be: as a strategic national asset. Protecting this infrastructure will be a **national security priority**."

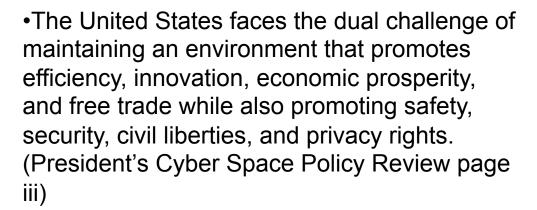
(President Obama, May 29, 2009)



# President Obama's Report on Cyber Security (May 30 2009)



Assuring a Trusted and Resilient Information and Communications Infrastructure





•Quoting from Internet Security Alliance Cyber Security Social Contract: Recommendations to the Obama Administration and the 111th Congress November 2008



## The Economy is reliant on the Internet

 The state of Internet security is eroding quickly. Trust in online transactions is evaporating, and it will require strong security leadership for that trust to be restored. For the Internet to remain the juggernaut of commerce and productivity it has become will require more, not less, input from security. PWC Global Cyber Security Survey 2008



## CURRENT ECONOMIC INCENTIVES FAVOR ATTACKERS

- Attacks are cheap and easy
- Vulnerabilities are almost infinite
- Profits from attacks are enormous (\$ 1 TRILLION in 08)
- Defense is costly (Usually no ROI)
- Defense is often futile
- Costs of Attacks are distributed



## The need to understand business economics to address cyber issues

» If the risks and consequences can be assigned monetary value, organizations will have greater ability and incentive to address cybersecurity. In particular, the private sector often seeks a business case to justify the resource expenditures needed for integrating information and communications system security into corporate risk management and for engaging partnerships to mitigate collective risk. Government can assist by considering incentivebased legislative or regulatory tools to enhance the value proposition and fostering an environment that encourages partnership." --- President's Cyber Space Policy Review May 30, 2009 page 18



### Regulation vs. Incentives

- ISA Social Contract argues vs. regulation which is slow/limited in effect/anti-US competitiveness/anti-security and won't work.
- Obama: "Let me be very clear, we are not going to regulate cyber security standards to the private sector." (May 29 2009)



#### **Congressional Testimony**

October, 2007





# ISA Model: Create a Market for Best Practices and Standards

- Studies show nearly 90% of breaches could be prevented by following known best practices and standards
- Priv Sector should continue to develop standards, practices 7 technologies
- Govt. test them for effectiveness
- Govt. should motivate adoption via sliding scale of market incentives



# ISA Proposed Incentives (Testimony E & C May 1, 2009)

- 1. R & D Grants
- 2. Tax incentives
- 3. Procurement Reform
- 4. Streamlined Regulations
- 5. Liability Protection
- 6. Public Education
- 7. Insurance
- 8. SBA loans
- 9. Awards programs
- 10. Cyber SAFETY Act



# President Obama's Report on Cyber Security (May 30, 2009)

- » The government, working with State and local partners, should identify procurement strategies that will incentivize the market to make more secure products and services available to the public. Additional incentive mechanisms that the government should explore include adjustments to liability considerations (reduced liability in exchange for improved security or increased liability for the consequences of poor security), indemnification, tax incentives, and new regulatory requirements and compliance mechanisms. <a href="Persident's Cyber Space Policy Review">Persident's Cyber Space Policy Review</a> May 30, 2009 page v
- » Quoting Internet Security Alliance Cyber Security Social Contract: Recommendations to the Obama Administration and 111<sup>th</sup> Congress



### Proposed Incentives: Liability

» The Federal government should consider options for incentivizing collective action and enhance competition in the development of cybersecurity solutions. For example, the legal concepts for "standard of care" to date do not exist for cyberspace. Possible incentives include adjustments to liability considerations (reduced liability in exchange for improved security or increased liability for the consequences of poor security), indemnification, tax incentives, and new regulatory requirements and compliance mechanisms. ---Obama Administration's Report on Cyber Security May 2009 page 28)



### Obama Near Term Action Plan:

- 1. Appoint a Cyber Security policy coordinator directly responsible to the President and "dual-hatted" to both the NSC and the NEC.
- 2. Prepare for the President's approval an updated national strategy to secure the information and communications infrastructure. This strategy should include continued evaluation of CNCI activities and, where appropriate, build on its successes.
- 5. Convene appropriate interagency mechanisms to conduct interagencycleared legal analyses of priority cybersecurity-related issues identified during the policy-development process and formulate coherent unified policy guidance that clarifies roles, responsibilities, and the application of agency authorities for cybersecurity-related activities across the Federal government.

President's Cyber Space Policy Review May 30, 2009 page vi



#### Obama Action Plan: International

Near Term Action Plan Item 7

"Develop US Government positions for an international cyber security policy framework and strengthen our international partnerships to create incentives that address the full range of activities, policies, and opportunities associated with cyber security" (Obama Cyber Space Policy Review P. 37)



### Obama Near Term Action Plan:

 Initiate a national awareness campaign. (train workforce/improve education also in mid-term plan)

Expand information sharing programs

 Refine Government procurement and improve market incentives



#### Financial Impact of Cyber Risk

October, 2008

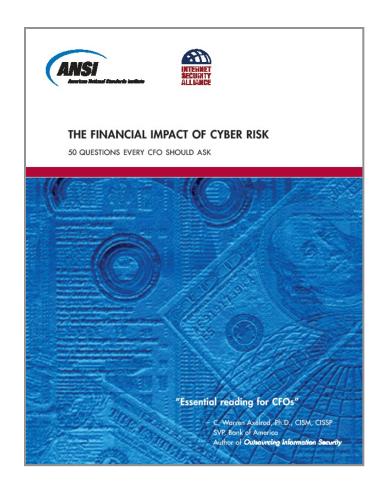




#### Financial Management of Cyber Risk

It is not enough for the information technology workforce to understand the importance of cybersecurity; leaders at all levels of government and industry need to be able to make business and investment decisions based on knowledge of risks and potential impacts. – President's Cyber Space Policy Review May 30, 2009 page 15

ISA-ANSI Project on Financial Risk Management of Cyber Events: "50 Questions Every CFO should Ask ----including what they ought to be asking their General Counsel and outside counsel. Also, HR, Bus Ops, Public and Investor Communications & Compliance





### Securing the IT Supply Chain

» The challenge with supply chain attacks is that a sophisticated adversary might narrowly focus on particular systems and make manipulation virtually impossible to discover. Foreign manufacturing does present easier opportunities for nation-state adversaries to subvert products; however, the same goals could be achieved through the recruitment of key insiders or other espionage activities. ---- President's Cyber Space Policy Review May 30, 2009 page 34





## Securing The IT Supply Chain In The Age of Globalization

November, 2007





### ISA/CMU Supply Chain Project

- 18 months long (start fall 07)
- Focus on firmware
- Carnegie Mellon University and Center for Cyber Consequences Unit
- 3 conferences
- 100 Gov., Industry and Academic participants
- Results are strategy and framework provided to USG for NSC 60-day review of cyber policy



## Outdated laws in the Digital Age Obama Report: Conclusion

 The history of electronic communications in the United States reflects steady, robust technological innovation punctuated by government efforts to regulate, manage, or otherwise respond to issues presented by these new media, including security concerns. The iterative nature of the statutory and policy developments over time has led to a mosaic of government laws and structures governing various parts of the landscape for information and communications security and resiliency. Effectively addressing the fragmentary and diverse nature of the technical, economic, legal, and policy challenges will require a leadership and coordination framework that can stitch this patchwork together into an integrated whole. President's Cyber Space Policy Review May 30, 2009 page C-12



## Developing SCAP Automated Security & Assurance for VoIP & Converged Networks

September, 2008





# ISA Unified Communications Legal Compliance Analysis (June 2009)

- 1.Descibes available Unified Communications (UC) Technologies
- 2. Describes Security Risks of Deployment
- 3. Inventory of Laws to be considered pre deployment
- Analysis if ECPA creates a legal barrier to deployment
- 5 Toolkit for lawyers and clients to assist in avoiding exposure from deployment



# Information Sharing

- Problem Clearly needs additional work
- DIB model results, good, but some problems and not scalable
- Trust is built on mutual exchange
- Alternatives:
- British Consultancy Model
- Roach Motel Model



# Social Contract: Info Sharing

- "We need to be sure information being shared can be put into action...We need to get the roadblocks out of the way
- Most companies w/limited budgets are locked into reactive defensive posture allowing for little more than signature based perimeter monitoring and if detected malware eradication."



# Obama Cyber Review

 Private sector engagement is required to help address limitations of law enforcement and national security. Industry leaders can help by engaging in information sharing...Information is the key to preventing & responding to cyber risk...A full and effective response may only be possible by brining information from all sources together to benefit all."



#### Obama Action Item #8

 Develop mechanisms for cyber security related information sharing that address concerns about privacy and proprietary information and make information sharing mutually beneficial'



#### Roach Motel: Bugs Get In Not Out

- No way to stop determined intruders
- Stop them from getting back out (w/data) by disrupting attackers command and control back out of our networks
- Identify web sites and IP addresses used to communicate w/malicious code
- Cut down on the "dwell time" in the network
- Don't stop attacks—make them less useful



# Old Model for Info Sharing

- Big Orgs may invest in Roach Motel (traffic & analytical methods) small orgs.never will
- Many entities already rept. C2 channels (AV vend/CERT/DIB/intelligence etc.)
- Perspectives narrow
- Most orgs don't play in info sharing orgs
- Info often not actionable
- Lack of trust



#### New Model (based on AV model)

- Focus not on sharing attack info
- Focus IS ON disseminating info on attacker C2 URLs & IP add & automatically block OUTBOUND TRAFFIC to them
- Threat Reporters (rept malicious C2 channels)
- National Center (clearing house)
- Firewall Vendors (push info into field of devices like AV vendors do now)



### Threat Reporters

- Govt/private/commecial orgs apply
- analytical capability to discover, C2 sites via malware reverse engineering
- Gov certified so there would be trust in their reports
- Only report malware C2 info (web site/lp address) & type (e.g. botnet)
- Can use Certification for branding



# National Clearinghouse

- Receive reports and rapidly redistribute to firewall device vendors
- Track validity of reports for re-certification
- Focus is rapid dissemination of automatically actionable info



#### Firewall Providers

- Producers of devices capable of blocking outbound web traffic
- Accept data from clearinghouse
- Reformat as needed
- Recalculate to customers as quickly as possible



#### Incentives

- Threat reporters: certification for branding
- Gov: secure industrial base low cost develop common operating picture
- Firewall device vendors: new market
- Medium & small companies; Security at low cost in both money and time
- Increase trust in internet



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