ANTI-TAMPER POLICY

MDA INSTRUCTION 5200.05-INS

June 1, 2012

Office of Primary Responsibility: Director for Engineering (DE)
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SUBJECT: Anti-Tamper Policy

References: See Enclosure 1

1. PURPOSE. This Instruction:

   a. Reissues Reference (a) as an Instruction and updates policy and responsibilities. This Instruction also institutes discipline in the development and implementation of Anti-Tamper (AT) technologies to protect Ballistic Missile Defense System (BMDS) Critical Program Information (CPI) from unintentional transfer.

   b. Establishes the Missile Defense Agency (MDA) AT procedures (including AT deliverables, milestones, and approvals), organizational responsibilities, and interfaces required to effectively execute this Instruction.

   c. Establishes accountability in implementing AT procedures and applying AT technologies to protect critical technologies.

2. APPLICABILITY AND SCOPE. This Instruction:

   a. Applies to all MDA Ballistic Missile Defense acquisition programs and associated technology programs (hereafter referred to collectively as “the MDA Programs”).

   b. In case of conflict between this document and Law or Government/Service regulations, the stricter requirement shall govern unless otherwise waived. Contact the MDA AT Technical Agent for consultation and guidance if conflicting requirements are identified.

3. DEFINITIONS. See Glossary.

4. POLICY. It is MDA policy that:

   a. MDA AT Executive Agent. The Director for Engineering (DE) shall serve as the MDA AT Executive Agent.

   b. MDA AT Technical Agent. MDA will establish an AT Technical Agent within the BMDS Architect (DEB) organization to support the MDA AT Executive Agent.
c. **AT Plan Requirements.** AT Plans must be written and coordinated based upon requirements defined in References (b) and (c). The Program Manager (PM) is responsible for development of the AT Plan.

d. **Security Coordination.** As soon as AT requirements are identified, throughout the AT development process, and in accordance with Reference (d), MDA Programs shall coordinate with the Director for Special Access Programs (SP) to evaluate AT special access security requirements and establish the required security controls.

e. **Transition.** As the MDA Programs evolve and prepare for transition to the Services for follow-on activities and sustainment, the Service AT representatives are to be engaged as early in the AT process as possible. The MDA AT Technical Agent (DEB), in conjunction with the AT Service Leads, will provide guidance necessary for programs to follow Service AT policies and procedures.

5. **RESPONSIBILITIES.** See Enclosure 2.

6. **PROCEDURES.** See Enclosure 3.

7. **EFFECTIVE DATE.** This Instruction is effective immediately.

[Signature]

JOHN H. JAMES, JR.
Executive Director

Enclosures

1. References
2. Responsibilities
3. Procedures
4. MDA Anti-Tamper Spiral Process
5. MDA Anti-Tamper Review/Approval Process
6. Anti-Tamper Related Analysis for SDR
7. Anti-Tamper Related Analysis for PDR
8. Anti-Tamper Related Analysis for CDR
9. Anti-Tamper Related Analysis for Completion Integrated Development Testing

Glossary
REFERENCES

(a) MDA Directive 5200.05, “Anti-Tamper Policy,” July 18, 2006 (hereby superseded)
(b) Assistant Secretary of the Air Force (Acquisition) Memorandum “Anti-Tamper (AT) Plan Requirements,” February 11, 2011
(c) Assistant Secretary of the Air Force (Acquisition), “DoD Anti-Tamper (AT) Guidelines Version 2.0,” April 1, 2010
(d) Assistant Secretary of the Air Force (Acquisition) “Anti-Tamper Security Classification Guide (U),” March 17, 2010
(e) MDA Instruction 5200.08-INS, “Critical Program Information Protection within the Missile Defense Agency,” August 1, 2011
(f) OUSD (AT&L) Memorandum “Guidelines for Implementation of Anti-Tamper Techniques in Weapon Systems Acquisition Programs,” May 1, 2000
(g) DoD Instruction 5200.39, “Critical Program Information Protection Within the DoD,” July 16, 2008, Incorporating Change 1, December 28, 2010
(i) OUSD (AT&L) Directive 5000.01 “The Defense Acquisition System,” May 12, 2003
ENCLOSURE 2

RESPONSIBILITIES

1. The Director for Engineering (DE) will:

   a. Serve as the MDA AT Executive Agent.

   b. Direct the MDA AT Technical Agent.

   c. Be responsible to the MDA Director (D) for establishing and implementing AT policy.

   d. Act as the decision authority for AT options and deliverables.

   e. Advocate the funding of AT across MDA Programs.

2. The MDA AT Technical Agent (DEB) will:

   a. Be responsible to DE for coordinating Element reviews, ensuring the affordability and appropriateness of proposed AT solutions, serving as the primary MDA liaison with the Department of Defense (DoD) AT Executive Agent, defining resources required to sustain AT policy implementation, engaging and supporting the Services in understanding and transitioning Element AT activities, and serving as the MDA AT information conduit.

   b. Provide and maintain a central repository for AT data to be used as a resource for MDA PMs, gathering information on AT points of contact, technologies, and techniques; and leading the development of generic AT technologies applicable to MDA AT implementation.

   c. Be responsible for coordinating AT activities across MDA and providing advice and guidance to MDA programs. The MDA AT Technical Agent shall review all MDA Program AT deliverables prior to submission for concurrence to the MDA AT Executive Agent and the DoD AT Executive Agent (or designated representative). In this capacity, the MDA AT Technical Agent will provide the Agency oversight necessary for AT to be implemented successfully from program initiation, through design, to fielding and/or transfer to the Services.

3. The Systems Engineer (DEE) will support the MDA AT Executive Agent in the development of AT requirements and specifications for implementing AT policy.

4. Technical Intelligence (DEI) will be responsible to DE for security, intelligence, counterintelligence (CI), and special programs support to MDA AT efforts. DEI will assess security planning and implementation across all MDA Programs and will coordinate with other DoD agencies as required to ensure compliance with DoD policies for horizontal protection of AT information and documentation. DEI will ensure MDA compliance with DoD policies regarding security of AT technologies and implementing plans and will ensure that AT security is applied consistently across all MDA Programs.
5. **Research, Development, and Acquisition (RDA) Security (DEW)** will be responsible for the following tasks under the authority of DEI:

   a. Lead the integration of CI, intelligence, security, and systems engineering through a collaborative process to identify CPI and develop a Program Protection Plan (PPP) for its protection.

   b. Support the identification and protection of CPI for all research projects transitioning to formal acquisition programs.

   c. Coordinate with the Intelligence Community to provide Technology Targeting Risk Assessments (TTRAs) to assist RDA programs to mitigate the risk of CPI compromise and coordinate CI requirements to develop CI Threat Assessments against CPI.

   d. Develop a plan for adjudication of horizontal protection issues.

   e. Support PMs to develop PPPs and coordinate the PPP approval process.

   f. Lead the development of and provide for training on safeguarding CPI to all MDA and contractor personnel with access to CPI that is commensurate with functional responsibilities or consistent with contractual requirements.

   g. Coordinate with external agencies as needed regarding CPI protection countermeasures and PPP issues.

6. The **Special Access Program Central Office (SAPCO)** will be responsible for any issues related to special access programs pursuant to existing DoD Directives. The SAPCO shall be responsible for ensuring special access protection of AT applications horizontally across the MDA Programs and of all associated documentation. The SAPCO shall support DE in serving as the focal point for access to the larger DoD AT special access community.

7. The **Director for International Affairs (DI)** will provide guidance regarding international participation in MDA Programs in advance of negotiations and/or conclusion of international agreements, and early engagement with the receiving Service to make transition efforts as seamless as possible.

8. The **Director for Operations (DO)** will provide AT affordability assessments, to include developing and/or reviewing cost estimates.

9. The **Director for Acquisition (DA)** will be responsible for reviewing requests for proposal for incorporation of appropriate AT provisions and clauses in solicitations and contracts.

10. **Program Managers (PMs)** will be responsible for adhering to the applicable requirements of this Instruction and guidelines issued by the DoD AT Executive Agent to provide the BMDS necessary and appropriate AT protection.
PROCEDURES

1. Timeline
   a. Entrance Criteria. For each program milestone identified in Enclosure 4, the entrance criteria is the submission of the AT product required (as described below) 60-days prior to the milestone.
   
   b. Exit Criteria. No program milestone identified in Enclosure 4 can be considered successfully completed without satisfying the exit criteria of having the AT product approved in accordance with the procedures illustrated in Enclosure 5.

2. AT Plan
   a. CPI Identification. MDA Programs must identify and document CPI in accordance with Reference (e), and perform appropriate analysis to determine if the CPI is at risk of unintentional transfer.
   
   b. AT Design Concept. The Critical Technology (CT) subset of CPI that is at risk of unintentional transfer must be provided AT protection. This analysis must be performed as early in the program development spiral as practical and must be documented in a manner sufficient to meet the AT approval milestone schedule requirements: for example, prior to a System (Concept) Design Review (SDR, as illustrated in Enclosure 6). Analysis to determine CPI risk should include, but is not limited to: the identification of impacts if exploited (exposure level and consequence of compromise), needed protection timelines, threat scenarios, vulnerabilities, attack tree analysis, available AT technologies, potential AT solutions, and AT designs and funding requirements.
   
   c. Responsibility. The PM is responsible for development of the AT Plan in accordance with the requirements of References (b) through (h) and this Instruction. PMs and officials in program oversight roles must adhere to the processes and procedures defined in this Instruction to ensure that the required AT deliverables and technologies provide an effective, risk-based, cost-effective AT program. It is essential that AT design efforts are initiated as early as possible in the acquisition lifecycle; however, regardless of when an AT program is established, every effort must be made to incorporate AT measures where appropriate, considering the overall risk of the loss of critical information or technology.
   
   d. Initial AT Plan. The initial AT plan (reference Enclosure 7 for analysis process), which is a classified annex to the PPP, shall include the program’s CPI analysis as identified by References (b) and (c), proposed AT measures, and must include other documentation as required by DoD policy. Prior to the Preliminary Design Review (PDR), the MDA Program must have completed, for approval, an initial AT plan as outlined in Section 5 of Enclosure 3 (page 10) and attached Enclosures.
e. **Final AT Plan.** The final AT plan (reference Enclosure 8 for analysis process), which is a classified annex to the PPP, shall document the potential AT reverse engineering threats, vulnerabilities, and mitigation techniques, and analysis to determine CPI risk. The plan must include a final AT design with attendant programmatic estimates (cost, schedule, performance, and risk). Prior to the Critical Design Review (CDR), the MDA Program must have completed, for approval, a final AT plan and AT validation and verification (V&V) plans as outlined in Section 5 of Enclosure 3 (page 10) and attached Enclosures.

f. **AT Plan Template.** An AT Plan Template is available from the MDA AT Technical Agent (DEB).

3. **Validation and Verification (V&V)**

a. **Validation.** The implementation of the AT techniques to the system or subsystem must be validated via a completed final AT plan, a formal review of associated Production Drawings, and a Physical Configuration Audit (PCA) of a prototype or pre-production system.

b. **Verification.** The performance of the integrated AT design must be verified via tests, demonstrations, analyses, and inspections. A verification plan must be developed to describe the specific testing objectives, methodology, and expected outcomes that will verify the effectiveness of the AT design. AT system verification plans must also be developed in accordance with References (c) and (f).

c. **Reporting.** Prior to completion of integrated development testing (Enclosure 9), all AT V&V testing must be successfully completed and results documented in an AT verification report submitted by the Program/Project Office to the MDA AT Executive Agent for approval.

d. **Documentation.** AT verification plans shall reside in the Developmental Master Test Plan (DMTP), or in an appropriately classified annex to the DMTS. AT shall also be cross-referenced in the System Engineering Plan where appropriate and consistent with other systems engineering planning and in other relevant acquisition documents to include the Acquisition Strategy Report and the Acquisition Program Baseline.

e. **Verification Plan Template.** A Verification Plan Template is available from the MDA AT Technical Agent (DEB).

4. **AT Technical Agent**

a. The MDA AT Technical Agent shall coordinate AT activities across MDA and with the DoD AT Executive Agent and provide advice and guidance to MDA Programs.

b. The MDA AT Technical Agent will review all MDA Program AT deliverables prior to submission for MDA AT Executive Agent approval, and concurrence by the DoD AT Executive Agent (or designated representative).
c. The MDA AT Technical Agent will monitor the MDA AT effort and develop additional or modify existing guidance, as necessary.

5. Approval Process

a. All AT products (see Enclosure 4) are submitted for approval to the MDA AT Executive Agent for coordination with the DoD AT Executive Agent. MDA approval and DoD coordination is facilitated by the MDA AT Technical Agent (DEB) (as described below).

b. The MDA AT development and approval process is summarized in Enclosures 4 and 5. AT development milestones (which satisfy the recommended DoD AT process) are intended to correspond to MDA Program maturity milestones including SDR, PDR, CDR, and Completion of Integrated Development Testing. This AT development process is completed for each system development spiral. All AT products are submitted for approval to the MDA AT Executive Agent for coordination with the DoD AT Executive Agent. MDA approval and DoD coordination is facilitated by the MDA AT Technical Agent (as described in Enclosure 2, Section 2).

c. Milestone Decision Authority for AT products and approval of all AT deliverables is delegated by the D to the MDA AT Executive Agent. The signature authority for AT deliverables remains with the PM; however, the MDA AT Technical Agent will coordinate the MDA review and DoD AT Executive Agent concurrence of deliverables prior to submission to the decision authority, the MDA AT Executive Agent.

d. The MDA AT Executive Agent will approve or disapprove AT implementation. In accordance with Reference (d), if an AT plan or its approved implementation is revised or altered by an MDA Program at any time, then the associated AT deliverables shall be resubmitted to the MDA AT Technical Agent for another cycle of the review and approval process. In addition, the MDA Programs shall brief current and planned AT activities at all program reviews (in an appropriately classified setting), including System Element Reviews, and decision points as identified by the MDA AT Technical Agent during their review of program plans and schedules.
**MDA ANTI-TAMPER SPIRAL PROCESS***

*Process applies to each capability spiral

**Entrance Criteria: AT Product due 60 days before review/milestone for review and approval

***Exit Criteria: AT Product approved (see Enclosure 5 for approval process)
ENCLOSURE 5

MDA ANTI-TAMPER REVIEW/APPROVAL PROCESS

* Submit AT Products (AT Design Concepts/ROM, Initial AT Plan, Final AT Plan, V&V Plan) for Approval

Review/Milestone

MDA AT Technical Agent Review/Concurrence

MDA AT Technical Agent Review with DE

MDA AT Executive Agent Approval

DoD AT Executive Agent Review/Concurrence

AT Products Approval

Joint Programs with Navy

Navy AT SYSCOM Technical Warrant Holder Review/Concurrence

Navy AT Deputy Warranting Officer Review/Concurrence

Navy AT Technical Warrant Holder Review/Concurrence

* Review/Milestone entrance criteria includes submission of plan for review and approval, 60 days before review/milestone

** Review/Milestone exit criteria includes approval of plan

SYSCOM = Systems Command (US Navy)
**ANTI-TAMPER RELATED ANALYSIS FOR SDR**

<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>1. DE</td>
<td>Establish AT Requirements in BMD SS</td>
</tr>
<tr>
<td>2. Element Identify</td>
<td>Critical Program Information / Critical Technologies</td>
</tr>
<tr>
<td>3. Identify Impacts if Exploited</td>
<td>• Lost Capabilities</td>
</tr>
<tr>
<td>4. Identify Threat Scenarios</td>
<td>• Life of Program</td>
</tr>
<tr>
<td>5. Identify Needed Protection Timeline</td>
<td>• Technology Lead Time</td>
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<tr>
<td>6. Identify Vulnerabilities</td>
<td>• Battlefield Loss</td>
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<tr>
<td>7. Attack Tree Analysis</td>
<td>• 3rd Party Transfer</td>
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<tr>
<td>8. AT Maintenance / Logistics</td>
<td>• FMS/DCS</td>
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<tr>
<td>9. Select Potential Solutions</td>
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*Not necessarily in sequence*

**BMD SS** = Ballistic Missile Defense System Specification  
**DCS** = Direct Commercial Sales  
**FMS** = Foreign Military Sales
ANTI-TAMPER RELATED ANALYSIS FOR PDR*

*Not necessarily in sequence

**See Enclosure 5 for approval process
ENCLOSURE 8

ANTI-TAMPER RELATED ANALYSIS FOR CDR

Systems Engineering
- Cost
- Schedule
- Performance
- Risk

Select Final Solutions
- Reliability
- Maintainability
- AT
- Safety

Coordinate with SAPCO to Identify Potential Special Access Requirements

Organize CPI and Final AT Techniques
- Components
- Subsystems
- Systems

Develop V&V Test Plans
- PCA
- Test Objectives
- Test Descriptions
- Test Methodology
- Expected Outcomes

Final AT Plan and AT V&V Plans

Approval / Concurrence of Final AT Plan Plus V&V Plans*

* See Enclosure 5 for approval process
ENCLOSURE 9

ANTI-TAMPER RELATED ANALYSIS FOR COMPLETION INTEGRATED DEVELOPMENT TESTING

Coordinate with SAPCO to Identify Potential Special Access Requirements

Finalize V&V Test Plans
  • Test Objectives
  • Test Descriptions
  • Test Methodology
  • Expected Outcomes

Execute V&V Test Plans
  • Document Results
  • Describe Variations

Verification Report

Completion Integrated Development Testing

Review/Approval of AT Design Verification Report*

* See Enclosure 5 for approval process
<table>
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<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>AT</td>
<td>Anti-Tamper</td>
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<tr>
<td>BMDS</td>
<td>Ballistic Missile Defense System</td>
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<tr>
<td>BMD SS</td>
<td>Ballistic Missile Defense System Specification</td>
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<tr>
<td>CDR</td>
<td>Critical Design Review</td>
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<td>CI</td>
<td>Counterintelligence</td>
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<td>CPI</td>
<td>Critical Program Information</td>
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<td>CT</td>
<td>Critical Technology</td>
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<td>D</td>
<td>Director</td>
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<td>DA</td>
<td>Director for Acquisition</td>
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<td>DCS</td>
<td>Direct Commercial Sales</td>
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<td>DE</td>
<td>Director for Engineering</td>
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<td>DEB</td>
<td>BMDS Architect</td>
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<td>DEE</td>
<td>Systems Engineer</td>
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<td>DEI</td>
<td>Technical Intelligence</td>
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<td>DEW</td>
<td>RDA Security</td>
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<td>DI</td>
<td>Director for International Affairs</td>
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<td>DMTS</td>
<td>Developmental Master Test Plan</td>
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<td>DO</td>
<td>Director for Operations</td>
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<td>DoD</td>
<td>Department of Defense</td>
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<td>FMS</td>
<td>Foreign Military Sales</td>
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<td>MDA</td>
<td>Missile Defense Agency</td>
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<td>PCA</td>
<td>Physical Configuration Audit</td>
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<td>PDR</td>
<td>Preliminary Design Review</td>
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<td>PM</td>
<td>Program Manager</td>
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<td>PPP</td>
<td>Program Protection Plan</td>
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<td>RDA</td>
<td>Research, Development, and Acquisition</td>
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<td>ROM</td>
<td>Rough Order of Magnitude</td>
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<td>SAPCO</td>
<td>Special Access Program Central Office</td>
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<td>SDR</td>
<td>System Design Review (aka Concept Design Review)</td>
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<td>SP</td>
<td>Director for Special Access Program</td>
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<tr>
<td>SYSCOM</td>
<td>Systems Command (US Navy)</td>
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<tr>
<td>TTRA</td>
<td>Technology Targeting Risk Assessment</td>
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<tr>
<td>V&amp;V</td>
<td>Validation &amp; Verification</td>
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PART II. DEFINITIONS

Unless otherwise noted, the following terms and their definitions are for the purpose of this Instruction only.

**Anti-Tamper (AT).** System engineering activities intended to deter and/or delay exploitation of critical technologies in a U.S. defense system in order to impede countermeasure development, unintended technology transfer, or alteration of a system. The purpose is to add longevity to a critical technology by deterring efforts to reverse-engineer, exploit, or develop countermeasures against a system or component.

**AT Plan.** A classified annex to the program’s PPP which includes, but is not limited to, the following information:

- Identification of the critical technology being protected and a description of its criticality to system performance.
- Foreign Teaming and foreign countries/companies participating.
- Threat assessment and countermeasure attack tree.
- Technology exposure level and consequence of compromise.
- AT system-level techniques and subsystem AT techniques investigated.
- Level of protection to be implemented.
- System maintenance and logistics plans with respect to AT.
- Recommended AT solution; to include system, subsystem, and component level.
- The effect that compromise would have on the acquisition program if AT were not implemented.
- Tamper event reporting requirements.
- The PM recommendation and the Milestone Decision Authority decision on AT.
- The program AT point of contact.

**Completion of Integrated Development Testing.** In concert with V&V, Completion of Integrated Development Testing ensures that the AT implementation does not have any unintended consequences for normal operation of the weapon system. Although some early V&V activities can be accomplished prior to full weapon system integration, integrated development testing is required to reduce risk.
Critical Program Information (CPI). Elements or components of an RDA program that, if compromised, could cause significant degradation in mission effectiveness; shorten the expected combat-effective life of the system; reduce technological advantage; significantly alter program direction; or enable an adversary to defeat, counter, copy, or reverse-engineer the technology or capability.

Includes information about applications, capabilities, processes, and end-items.

Includes elements or components critical to a military system or network mission effectiveness.

Includes technology that would reduce the U.S. technological advantage if it came under foreign control.

Critical Technology (CT). A subset of CPI that is resident on the weapon system, training device, or maintenance support equipment whose criticality of loss and/or reverse engineering warrants AT protection. CTs are technologies whose protection preserves the U.S. Government’s research and development resources as an investment in the future, rather than as an expense if technology is compromised and must be replaced prematurely.

Program Protection Plan (PPP). The PPP is the PM’s single source document used to coordinate and integrate all protection efforts designed to deny access to CPI to anyone not authorized or not having a need-to-know and prevent inadvertent disclosure of leading edge technology to foreign interests. If there is to be foreign involvement in any aspect of the program, or foreign access to the system or its related information, the PPP will contain provisions to deny inadvertent or unauthorized access. Additional guidance on Program Protection Planning, Technology Protection, and AT may be found in the References (b), (c), (d), (e), (g), (h) and (i), as well as in the Defense Acquisition Guidebook website at https://dag.dau.mil.

Unintentional Transfer. Transfer of technology as a result of battlefield loss or transfer of technology occurring outside of what is specified and planned in memoranda of understanding and/or agreements (signed between the U.S. and other nations) which govern co-development, co-production, or FMS.

Validation. The process of determining that the AT implementation will fulfill its intended function in its intended operational environment. (i.e., are we building the right product? Does the AT Plan satisfy the AT requirements? Does the design implement the AT features and functions identified in the AT Plan?)

Verification. The analysis, inspection, demonstration, and test of AT measures that were stipulated in the AT Plan, as well as the determination that the AT within the component and/or system will perform according to the AT developer’s specifications (i.e., are we building the product right? Does the AT system work as intended? Did we implement the AT correctly in the system?)