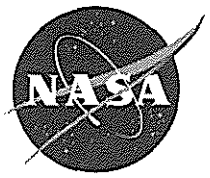
National Aeronautics and
Space Administration

Headquarters
Washington, DC 20546-0001



JUN 2 6 2008

Reply to Attn of: **Office of the Chief Information Officer**

Jasmeet K. Seehra
Office of Management and Budget
New Executive Office Building
725 17th Street, NW, Room 10236
Washington, DC 20503

Dear Ms. Seehra:

NASA would like to update OMB on our FDCC compliance activities as discussed in the "FDCC Status" email sent February 6th, 2008. NASA currently has 61,795 systems which are within the scope of FDCC policies.

Ongoing testing using the official NIST FDCC settings has demonstrated considerable functionality problems with NASA's financial management software, web-based training, and numerous scientific applications. Several NASA programs, including the Space Shuttle Program (SSP), utilize software in their operational processes that cannot be readily replaced with FDCC-compliant versions without considerable mission impact. With SSP nearing decommissioning, NASA must carefully consider the cost/benefit of updating such software. In addition, the NASA SATERN web-based training application provided by OPM and SAP's financial management software are both widely used across NASA, yet have not been updated to work within the FDCC environment.

Testing reveals only about 15% of the FDCC controls interfere with essential mission functionality within NASA's applications. Fortunately, most of these controls are either being adjusted or removed entirely by NIST as detailed in their proposed updates to the existing FDCC settings. NASA has also provided NIST with dozens of data content errors in the FDCC settings themselves, and requested support for 64-bit versions of Windows XP and Vista. We hope these issues will be resolved in future versions of the FDCC settings, but currently do not have an official commitment from NIST.

The above realities, coupled with the requirement to ensure continued operations in support of its mission, have led NASA to adjust its approach to FDCC compliance. Rather than pursuing a complete implementation of every control in the current NIST FDCC settings, NASA will develop and maintain a baseline set of controls that can be consistently deployed on all general purpose Windows systems. This new approach will reduce mission impact while NIST evolves its nascent FDCC processes. Following the NIST proposed update scheduled for later this month, NASA expects to adopt at least 90% of the NIST FDCC controls.

NASA will be deploying this new baseline with an FY2008 implementation goal of 85% of the in-scope systems. The new approach to FDCC compliance across NASA will reduce risk to the mission, decrease deployment costs, leverage efficiency gains as NIST improves its FDCC settings, and result in consistent and auditable security configurations. As NASA's applications and infrastructure are updated, the NASA baseline will be adjusted to include an increasing number of the remaining NIST FDCC controls. The eventual goal is a complete convergence with NIST as NASA deploys the Vista operating system beginning in calendar year 2009.

Sincerely,

Jonathan Q. Pettus
Chief Information Officer