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MARINE CORPS ORDER 2281.1A

From: Commandant of the Marine Corps
To: Distribution List

Subj: MARINE CORPS ELECTRONIC KEY MANAGEMENT SYSTEM (EKMS) POLICY

Ref: (a) EKMS 1B (NOTAL)
(b) EKMS 3C (NOTAL)
(c) EKMS 5A (NOTAL)
(d) MCO 5239.2A
(e) MCO 5311.1D
(f) MCO 3900.15B
(g) SECNAV M-5210.1
(h) DoDD 8570.01, "Information Assurance Training, Certification, and Workforce Management," August 15, 2004
(i) MCO 5530.14A
(j) OPNAVINST 2221.5C
(k) MCO 4000.57A
(l) MCO 4400.150
(m) MCO P4790.1B
(n) MCO P4790.2C
(o) MCO 3900.17
(p) NAVMC 3500.56A
(q) MCO P4400.82F

Encl: (1) Marine Corps EKMS Policy

1. Situation. Communications Security (COMSEC) is the discipline of preventing unauthorized interceptors from accessing telecommunications in an intelligible form, while still delivering content to intended recipients. COMSEC is every Marine Corps command's responsibility. To manage COMSEC effectively, each command with EKMS accounts must comply with this Order, and the policies, standards, and procedures in the references. This Order provides amplifying guidance to the references and addresses Marine Corps-specific COMSEC issues. Additionally, this Order applies to all Marine Corps COMSEC material and its provisions apply to all who require access to or the use of COMSEC material within the EKMS.

2. Cancellation. MCO 2281.1.

3. Mission. To establish specific Marine Corps EKMS policy, supplementing the references (a) through (q).

4. Execution

a. Commander's Intent and Concept of Operations

(1) Commander's Intent. To augment the references with Marine Corps-specific information on COMSEC material support, management, maintenance,

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reporting, and oversight to the Marine Corps Operating Forces (OPFOR), Supporting Establishment, and Headquarters Marine Corps Activities.

(2) Concept of Operations. The Marine Corps COMSEC stakeholders shall adhere to national, Department of the Navy (DON), and Marine Corps COMSEC policy in applying uniform standards for the protection of COMSEC material.

b. Subordinate Element Missions

(1) Director, Command, Control, Communications, and Computers (C4)

(a) Retain responsibility to the Commandant of the Marine Corps for the management of EKMS within the Marine Corps.

(b) Coordinate and validate Marine Corps EKMS and cipher encryption capabilities to ensure they are fully integrated and resourced as outlined in reference (d).

(c) Ensure appropriate supervision of all COMSEC equipment and keying material in the Marine Corps' EKMS Program through the appointment of an EKMS Program Manager.

(2) EKMS Program Manager

(a) Promulgate, review, and update all orders, policies, and procedures relating to EKMS matters.

(b) Provide oversight of certification and accreditation (C&A) of hardware and software baselines and upgrades of COMSEC management platforms.

(c) Coordinate with the National Security Agency (NSA) and DON on Crypto Modernization (CRYPTOMOD) guidance, Algorithm Integrated Product Team (IPT), and emerging technology.

(d) Coordinate cryptographic key ordering to support Marine Corps organizations with cryptographic key requirements.

(e) Serve as Chairperson of the semiannual Marine Corps COMSEC Management Advisory Group (MCMAG). Ensure EKMS policy changes agreed upon during MCMAG working group meetings are promulgated to Marine Corps Operating Forces (OPFOR), Supporting Establishments, and Headquarters Marine Corps Activities.

(3) Deputy Commandant, Combat Development and Integration (DC, CD&I)

(a) Validate all COMSEC requirements for Marine Corps Programs of Record (POR) in addition to Urgent Universal Needs Statements (UUNS), Universal Need Statements (UNS), and all other COMSEC requests to satisfy Marine Corps operational requirements.

(b) Validate Approved Acquisition Objectives (AAO) and operational requirements for all COMSEC material (i.e., common fill devices, embedded components, and terminal devices (in-line and bulk encryptors)) within the Marine Corps.

(c) Validate all Table of Organization and Equipment Change Requests (TOECR) in accordance with references (e) and (f).

(d) Provide representation at the semiannual MCMAG meetings.

(4) Commanders, Marine Forces (COMMARFOR)

(a) Ensure the execution of all requirements of the references and this Order within respective headquarters, subordinate commands, and area of responsibility (AOR).

(b) Review and consolidate COMMARFORs COMSEC requests for equipment to DC, CD&I for validation.

(c) Facilitate the collective reporting of requested information to meet Marine Corps reporting requirements.

(d) Ensure annual reviews of individual EKMS account holdings.

(e) Provide representation at the semiannual MCMAG meetings.

(5) Commander, Marine Corps Systems Command (MCSC)

(a) Serve as the Commandant's sole agent for the procurement of COMSEC equipment and systems.

(b) Coordinate and authorize transfers of Marine Corps COMSEC equipment between Services, vendors, and support contract entities.

(c) Provide representation at the semiannual MCMAG meetings.

(6) Commander, Marine Corps Logistics Command (MARCORLOGCOM)

(a) Provide enterprise ground equipment, supply chain distribution, and maintenance management for EKMS assets.

(b) Facilitate the collective reporting of requested information to meet Marine Corps reporting requirements.

(c) Provide representation at the semiannual MCMAG meetings.

(7) Commander, Marine Corps Installations Command

(a) Coordinate with Installations to ensure the execution of all requirements of this Order.

(b) Coordinate and approve all garrison COMSEC requirements prior to submission to CD&I.

(c) Coordinate and facilitate the transfer of Marine Corps COMSEC equipment between Services, vendors, and support contract entities via the Immediate Superior in Command (ISIC) and MCSC COMSEC Project Office (CPO).

(d) Facilitate the collective reporting of requested information to meet Marine Corps reporting requirements.

(e) Ensure annual reviews of individual EKMS account holdings.

(f) Provide representation at the semiannual MCMAG meetings.

(8) Marine Expeditionary Force (MEF) COMSEC Management Office (MCMO)

(a) Plan for and execute COMSEC for Major Subordinate Commands (MSC) and elements of the MEF.

(b) Facilitate the collective reporting of requested information to meet Marine Corps reporting requirements.

(c) Coordinate and facilitate the transfer of Marine Corps COMSEC equipment between Services, vendors, and support contract entities via the Immediate Superior in Command (ISIC) and MCSC COMSEC Project Office (CPO).

(d) Operate and maintain a certified EKMS Manager's training facility.

(e) Provide representation at the semiannual MCMAG meetings.

(9) Marine Corps COMSEC Management Advisory Group (MCMAG)

(a) Serve as EKMS advisor and resolution forum for C4 and the Marine Corps C4 Operational Advisory Group (C4 OAG) on EKMS matters.

(b) Advise C4, the C4 OAG, the Marine Corps EKMS community, and the Naval Communications Security Material System (NCMS) office on EKMS Marine Corps policies and procedures.

5. Administration and Logistics

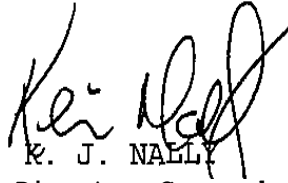
a. Reporting. All EKMS managerial personnel shall submit required reports in accordance with applicable references, this Order, and ad hoc reporting as directed by the EKMS Program Office.

b. Records Management. All developers, owners, and users of information systems have the responsibility to establish and implement adequate operation and information technology controls including records management requirements to ensure the proper maintenance and use of records, regardless of format or medium, to promote accessibility and authorized retention per the approved records schedule and reference (g).

c. Privacy. In the event of the generation, collection, or distribution of personally identifiable information, all EKMS personnel shall manage privacy sensitive information in accordance with the Privacy Act of 1974, 5 U.S.C. 552a as amended. Any unauthorized review, use, disclosure, or distribution is prohibited.

6. Command/Signal

- a. Command. This Order is applicable to the Marine Corps Total Force.
- b. Signal. This Order is effective upon date signed.



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Director, Command, Control,
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Chapter 1

Roles and Responsibilities

1. General. This chapter outlines the roles and responsibilities within the Marine Corps EKMS Program, which aligns with national and Department of the Navy (DON) policies.

2. EKMS Program Manager

a. Roles. Oversee all aspects of the Marine Corps EKMS Program.

b. Responsibilities. The EKMS Program Manager's responsibilities include, but are not limited to, the following:

(1) Ensure EKMS policies are followed, Marine Corps wide, to fulfill national, DON, and the Marine Corps operational requirements.

(2) Provide insight, input, and ensure compliance with all EKMS operations and publications.

(3) Disseminate all EKMS and COMSEC correspondence to the EKMS community.

(4) Approve commands establishments and disestablishments of EKMS accounts.

(5) Serve as Marine Corps' Closing Action Authority (CAA) for COMSEC accounts reporting COMSEC Incident Reports (CIR).

(6) Coordinate with NCMS on the implementation of EKMS policy and procedures.

(7) Attend applicable COMSEC working group meetings (i.e., CRYPTOMOD, Key Management Infrastructure (KMI), Algorithm Integrated Product Team (IPT), etc.).

(8) Oversee Information Assurance Manager (IAM) Level I certifications in accordance with reference (h).

(9) Manage and validate Defense Courier Division (DCD) transactions, monthly service charges, and audit responsibilities.

(10) Serve as Immediate Superior in Command (ISIC) for subordinate EKMS accounts across the Marine Corps.

(11) Serve as Controlling Authority for Marine Corps owned COMSEC keying material (KEYMAT), responsible for managing national level KEYMAT in coordination with Tier-1 and Director, National Security Agency (DIRNSA).

(12) Serve as Command Authority, responsible for validating User Representatives account information and registering privileges at the Central Facility.

(13) Coordinate with DC, CD&I and MCSC regarding CRYPTOMOD guidance and emerging technology.

(14) Review and comment on COMSEC equipment inquires, prior to submission to DC, CD&I for validation, on the Information Technology Procurement Request Review/Approval System (ITPRAS).

(15) Perform other COMSEC related duties as assigned by the Director C4.

(16) Serve as Chair for the Marine Corps COMSEC Management Advisory Group (MCMAG) Working Group meetings.

3. Naval Communications Security Material System (NCMS) Marine Corps Liaison

a. Role. Serve as the Marine Corps' representative at the NCMS command.

b. Responsibilities. The Marine Corps Liaison responsibilities include, but are not limited to, the following:

(1) Identify and address Marine Corps accomplishments and concerns, which enhance the DON mission of providing effective COMSEC training and support to EKMS accounts.

(2) Provide insight and input on messages and publications (EKMS series).

(3) Provide assistance to the Marine Corps EKMS Program Office.

(4) Coordinate with U.S. Army, U.S. Air Force, and NCMS Central Office of Record (COR) offices to ensure accuracy in Marine Corps EKMS accounting.

(5) Assist Marine Corps EKMS Managers with reconciliation issues, as required.

(6) Prepare briefing materials and conduct information sessions at Town Halls and Working Group meetings.

(7) Serve as Registration Authority for all Marine Corps EKMS accounts.

(8) Ensure multiservice cohesion of policy and communications between the Marine Corps and the National Security Agency (NSA).

(9) Serve as Marine Corps representative on the NCMS Advice and Assistance (A&A) Teams.

(10) Perform other EKMS related duties as assigned by Commanding Officer (NCMS).

4. Marine Corps Systems Command (MCSC)

a. Roles. Serve as principle office for the Marine Corps' Operating Forces, Supporting Establishment, and HQMC Activities to support the Total

Life Cycle Management (TLCM) strategy of COMSEC equipment. MCSC maintains the External Contracting Waiver and Determinations and Findings (ECW D&F) and procures all COMSEC equipment through the National Security Agency (NSA) and via approved channels.

b. Responsibilities. MCSC procures COMSEC equipment for entry into the Marine Corps inventory and the development and execution of the Total Life Cycle Management (TLCM) strategy for all Marine Corps COMSEC assets. MCSC responsibilities include, but are not limited to, the following:

(1) Maintaining the Economy Act Order (EAO). The EAO allows procurement of COMSEC equipment/Controlled Cryptographic Items (CCI) assets through the National Security Agency (NSA).

(2) Provide technical assistance to DC, CD&I as it reviews, analyzes, and validates COMSEC requests from the Operating Forces (OPFORs), Supporting Establishment, Headquarters Marine Corps Activities, and acquisition programs.

(3) MCSC will ensure system-to-system exchange of procurement information to ensure allowance and asset visibility of the entire Marine Corps ground equipment (i.e., Principal End Item (PEI)) inventory. All COMSEC equipment purchased or in the possession of the Marine Corps shall be registered within the Total Force Structure Management System (TFSMS), accounted for within Global Combat Support System-Marine Corps (GCSS-MC), and accountable in a Marine Corps Accountable Property System of Record (APSR).

(4) Manage applicable components stock list (SL-3), Technical Manuals, Supply System Responsibility Item (SSRI), and Using Unit Responsibility Item (UURI) to ensure items accurate identification in TFSMS to enable complete end-item list component cataloging.

(5) Coordinate with MARCORLOGCOM for the transfer and delivery of fielded cryptographic equipment to supply activities.

(6) Develop and update transition plans for migration of legacy cryptographic equipment to modern cryptographic solutions (i.e., cryptographic modernization).

(7) Provide disposition instructions for Marine Corps cryptographic equipment stored at MARCORLOGCOM facilities including Marine Corps Logistics Base (MCLB) and contracted support sites.

(8) Coordinate technical support to MCSC fielded programs with cryptographic equipment requirements supporting secure voice, data, imagery, and intelligence operations.

(9) Oversee engineering, fabrication, and procurement of cables, ancillary components, and installation kits to the Operating Forces, Supporting Establishment, and Headquarters Marine Corps Activities for MCSC fielded systems via the Marine Corps Tactical Systems Support Activity (MCTSSA).

(10) Provide the latest Software Configuration Management (SCM) revisions to MARCORLOGCOM, Marine Forces (MARFORs), and Supporting

Establishments. MCSC will provide the approved software, loading tools, and testing and keying equipment to maintain software revisions in stores to address CCI secondary reparable (SECREP) equipment in LOGCOM stores or in COMSEC MARFOR possession.

(11) Ensure COMSEC maintenance requirements and strategies are defined in the Depot Maintenance and Reset Playbook and participate in Enterprise Level Maintenance Planning (ELMP) activities.

(12) Maintain software baselines and configuration management for modern cryptographic equipment by publishing baselines via record messages semiannually.

5. Commander, Marine Corps Logistics Command (MARCORLOGCOM)

a. Roles. Serve as the Marine Corps Ground Equipment Manager and executive agent for Marine Corps Principal End Items (PEI) inventory management.

b. Responsibilities. Provide maintenance management and strategic pre-positioning capability in support of the Operating Forces, Supporting Establishment, Headquarters Marine Corps Activities, and other supported units to maximize their readiness and sustainability. Additionally, serve as the sustainment authority for COMSEC equipment and systems. MARCORLOGCOM responsibilities include, but are not limited to, the following:

(1) Perform as receiving, distribution, and disposition principle for cryptographic equipment.

(2) Coordinate with MCSC concerning transfers of on-hand inventory, including SECREP inventory and delivery of authorized COMSEC equipment/CCI assets (i.e., Push-Fulfillment) to the Marine Expeditionary Force (MEF) level.

(3) Perform software revisions and upgrades based on information provided or mandated by MCSC or the NSA. MARCORLOGCOM places all assets, in stores out of mandated Software Revision scope, in Condition Code "D." Assets will have the latest authorized software revision prior to issue to a using unit; however, there may be occasions due to operational tempo, workload, or other higher priorities where assets may be shipped from MARCORLOGCOM without the current software version(s). If assets are shipped without the current software baseline, MARCORLOGCOM will affix an Inspection and Repair Tag - Ordnance Equipment (Navy Marine Corps (NAVMC) 1018) to the asset indicating the software version.

(4) Procure SECREP material solutions for approved Table of Organization (T/O) and Equipment Change Requests (TOECR) for COMSEC equipment based on lifecycle and mission needs.

(5) Identify and resource shortfalls to support cataloging.

(6) Through a monthly reconciliation with the COMSEC Equipment Specialist, apply a prioritization schematic in support of cataloging data

elements and efforts. Provide for a monthly reconciliation with the COMSEC Equipment Specialist based on MCSC prioritization of cataloging data elements in support of provisioning efforts.

(7) Coordinate with NCMS (N5) on all requests for disposition of Marine Corps COMSEC equipment.

(8) Conduct Enterprise Lifecycle Maintenance Planning (ELMP) activities and provide for Depot Level sustainment in coordination with requirements delineated in the Playbook.

(9) Publish and maintain a Standard Operating Procedures (SOP), which addresses how COMSEC equipment is transferred and repaired.

6. Marine Expeditionary Forces COMSEC Management Office (MCMO). The MCMO is the Immediate Superior in Command (ISIC) for its major supporting commands.

a. Roles. Provide continuity and oversight within the respective area of responsibility (AOR).

b. Responsibilities. The MCMO responsibilities include, but are not limited to, the following:

(1) Collect and disseminate information throughout AOR.

(2) Provide oversight of current COMSEC inventory, in accordance with reference (a).

(3) Coordinate and validate completion of software revisions and upgrades based on information provided or mandated by MCSC or the National Security Agency (NSA), in accordance with reference (a).

(4) Provide assistance in annual reviews, in conjunction with Logistics (G-4) and Communications-Electronics (G-6) offices, of individual COMSEC account holdings against the Unit's Table of Equipment (T/E) Allowance (i.e., equipment and keying material) to validate continued holdings.

(5) Endorse and forward COMSEC Table of Organization and Equipment Change Requests (TOECRs) prior to submission to DC, CD&I for validation.

(6) Serve as the Controlling Authority for locally generated keying material (i.e., ALC 7) and ALC 6 when the Central Office of Record (COR) authorizes the generation of such keying material.

(7) Provide guidance to Major Subordinate Command (MSC) ISICs.

(8) Conduct EKMS Inspections in accordance with references (a) and (b).

(9) Create, implement, and enforce local EKMS policies and procedures.

(10) Maintain EKMS account points of contact roster to include COMSEC Project Office, EKMS Program Manager, and Marine Corps Liaison.

7. Immediate Superior in Command (ISIC). As defined in reference (a), ISICs are the command's agent responsible for administrative oversight of all EKMS matters for their subordinate commands. The ISIC roles will only be assigned to personnel who have completed the EKMS course of instruction, served as an account manager, and are a certified EKMS inspector within six months of being assigned as an ISIC.

a. Roles. ISICs are identified and appointed by Commanding Generals, Staff Communications Material System Responsibility Officers (SCMSRO), or Assistant Chief of Staff (AC/S) G-6, as applicable. ISICs are under the purview of each MARFOR, MEF, Supporting Establishments, or MSC Assistant Chief of Staff (AC/S) [G-6]. Reference (a) does not direct appointment of ISICs; however, this Order mandates the appointment of ISICs to help delineate area of responsibility (AOR). A sample appointment letter is provided in Appendix A.

b. Responsibilities. EKMS related responsibilities for personnel assigned to units with ISIC responsibilities include, but are not limited to the following:

(1) Appointment of EKMS Inspectors to conduct inspections and Staff Assist Visits (SAVs).

(2) Conduct EKMS Inspections biennially; more often is encouraged.

(3) ISIC/EKMS Inspectors must provide copies of EKMS Inspection Reports to the EKMS Program Office.

(4) Conduct SAVs within 60 days of a unit's return from deployment.

Note: The requirement to perform SAV includes Marine Expeditionary Units (MEUs) returning from deployment. SAV results documentation are retained locally.

(5) Collect and disseminate COMSEC information throughout AOR.

(6) Validate current inventory held at assigned MSC accounts.

(7) Provide guidance to EKMS Managers, in accordance with the references, to include COMSEC related correspondences (i.e., ALCOMs, COMSEC Advisories, MARADMINs, Modification Instructions [MI]).

(8) Ensure all EKMS Managers receive training to meet Individual Training Standards in accordance with reference (p).

(9) Promulgate, implement, and enforce local COMSEC policies and procedures.

8. Commanding Officer (CO). Commanding Officers are ultimately responsible for the proper management and security of all COMSEC material held by their command. COs must perform all roles and responsibilities as outlined in references (a), (b), (c), and (i).

9. Staff Communication Material System Responsibility Officer (SCMSRO). Commanding Generals and Commanding Officers of Marine Corps Installation can

appoint SCMSROs. All SCMSROs are appointed in writing. Their specific roles and responsibilities are identical to Commanding Officer's roles.

Note: For COMSEC accounts within MARFORRES' area of responsibility, the Commanding Officer appoints the Inspector Instructor (I-I) or Site Commander as the SCMSROs to administer all routine COMSEC matters.

10. EKMS Manager. The individual designated in writing by the Commanding Officer who is responsible for all actions associated with the receipt, handling, issue, safeguarding, accounting, and disposition of COMSEC material assigned to the EKMS account.

a. Roles: Perform all roles as outlined in references (a), (b), (c), and this Order.

b. Responsibilities: EKMS Manager responsibilities for assigned personnel include, but are not limited to the following:

(1) Obtain Information Assurance Manager (IAM) Level 1 certification in accordance with reference (h).

(2) Obtain and maintain Top Secret security clearance eligibility.

(3) Report software upgrades to directing command or entity.

(4) Maintain equipment records jackets for each piece of CCI held within the EKMS Managers possession (CCI not issued out to a Local Element (LE), but held in the EKMS vault).

Note: MARCORLOGCOM EKMS accounts are exempt from this requirement.

(5) Perform an annual review of COMSEC account CCI to purge excess or obsolete items. Report inconsistencies to unit communications chief, supply, and the ISIC.

(6) Ensure user and/or maintenance personnel attach NAVMC 1018 tags to all CCI that are returned to MARCORLOGCOM. The following information must be annotated on all NAVMC 1018 tags: condition code, nomenclature, COMSEC short title, software version, and whether the item is standalone or SSRI/embedded to a specific end item.

11. Alternate EKMS Manager. Alternate EKMS Managers roles and responsibilities are identical to EKMS Managers.

12. Local Element (Using). A Local Element (LE) (Using) receives material from its parent EKMS account. The issued COMSEC material is only used by authorized personnel of that work section and may not be issued outside of that work section (Figure 1-1). Typically, a LE (Using) issued material is maintained in local security containers, as specified in chapter 2 of this Order, or within work sections for usage by authorized section personnel.

13. Local Element (Issuing). A LE (Issuing) receives material from its parent EKMS account on a local custody basis for further issuance to LE users, external to their work section yet within their command. Users are attached to the command or unit of the LE Issuing that provides service (Figure 1-2).

Note: Issuing of COMSEC material from an EKMS account to either LE (Issuing) or LE (Using), which are not part of the organization owning the EKMS account, must be established and supported through a formal Memorandum or Letter of Agreement (MOA/LOA).

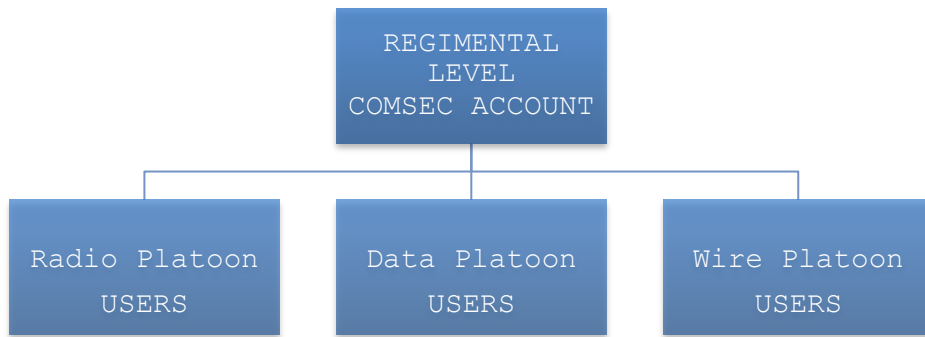


Figure 1-1.--Hierarchical Example of Local Element (Using)

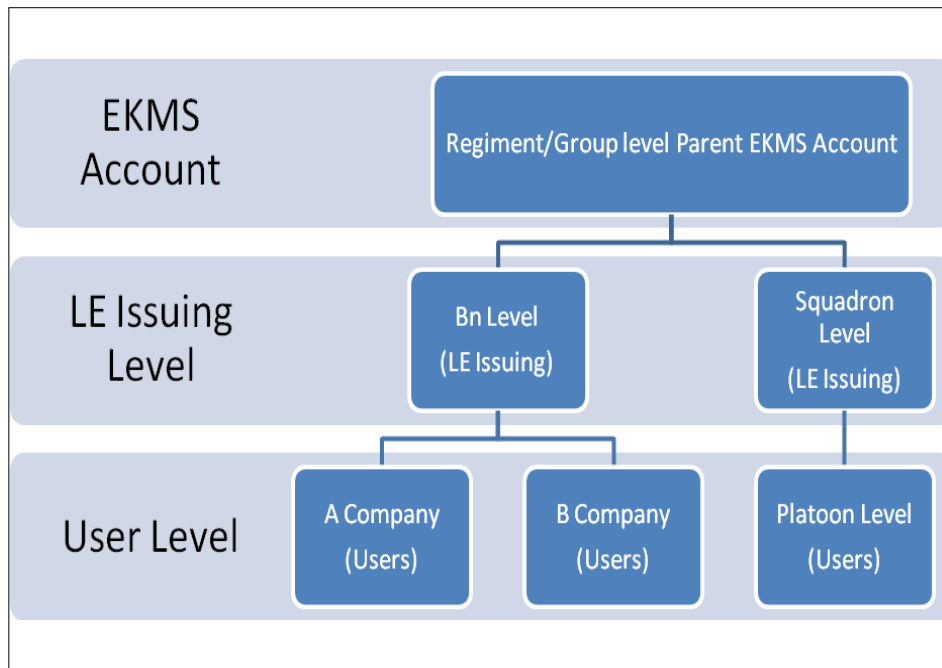


Figure 1-2.--Hierarchical Example of Local Element (Issuing)

Chapter 2

Safeguarding COMSEC Material and Facilities

1. General. EKMS Managers and Local Elements must maintain positive control of issued COMSEC material and the proper maintenance of COMSEC facilities where material and equipment is stored and used. All COMSEC material must be safeguarded and properly used, as mandated by national and Department of the Navy (DON) policy. EKMS Managers and Local Elements are required to promptly and accurately report to proper authorities all occurrences, circumstances, or acts which could jeopardize the security of COMSEC material. This chapter addresses COMSEC facilities, Physical Security Surveys (PSS), Disaster Recovery Kits (DRK), and special access requirements.

2. Security of COMSEC Facilities. Reference (i) mandates that PSS of COMSEC facilities are required on a biennial (every two years) basis. The PSS must focus on the facility's structural integrity only. Subsequent or follow-on PSS must not exceed 730 days.

3. Physical Security Survey (PSS). PSS's are conducted in accordance with reference (i). The following COMSEC specific guidance applies:

a. All COMSEC facilities must meet the requirements in reference (a).

b. Discrepancies discovered during a PSS must be reported within 90 days of receipt by the inspected command to the local Provost Marshal Office (PMO) [in the case of Marine Forces Reserve (MARFORRES), the Operations and Planning Division (G-3/G-5) Physical Security Section] with a corrective action report. The corrective action report provides a response to discrepancies or comments highlighted in the PSS and must contain the identified discrepancy and corrective action(s) taken.

c. EKMS Managers must maintain all completed PSS's for ISIC validation for initial or continued approval to hold classified COMSEC material up to applicable security level. ISICs will validate PSS accuracy during EKMS account inspections.

d. Completed 90-day after action reports for discrepancies found on the commands COMSEC facility PSS shall be maintained by the EKMS account and filed with the latest PSS.

Note: For EKMS accounts operated from within a Sensitive Compartmented Information Facility (SCIF), the Special Security Officer (SSO) will provide the facility accreditation letter or message validating the integrity of the facility.

4. Designation of Restricted Areas. COMSEC facilities are Level Two Restricted Areas. Commanding Officers are responsible for designating COMSEC facilities as restricted areas. The designation letter must be posted within COMSEC facilities near the main entrance.

5. Disaster Recovery Kit (DRK). The DRK is mission essential and maintained as a complete unit/kit to ensure capability of immediate recovery of the Local Management Device/Key Processor (LMD/KP) suite in the event of

emergency action (i.e., fire, flood, emergency evacuation, etc.). DRK procedures must be included in the Command's COMSEC portion of the Emergency Action Plan (EAP)/Emergency Destruction Plan (EDP). The minimum contents of the DRK must include the following:

- a. REINIT 1 Keys (current) [four keys].
- b. NAVREINT 2 Keys (current) [two keys].
- c. Spare EKMS privileged Enhanced Crypto Card (KSV-21).
- d. Backup Key Processor (KP) User CIKs (One for each registered KP Operator).
- e. Both Backup Edge Compact Disc/Digital Video Disc (CD/DVD).
- f. Keys to the LMD hard drive lock (i.e., front plate).
- g. Backup tapes (One for each: daily, /root and /dev/u).
- h. Security Container Information Form (SF-700), with passwords for Root, each registered System Administrator and COMSEC Management Work Station as applicable.

Chapter 3

EKMS Inspection Program

1. General. The Department of the Navy (DON) EKMS policy mandates biennial (i.e., every two years) inspections of all EKMS accounts to ensure compliance and proper management. Inspections provide an effective management tool to make sure that EKMS policies and procedures are being properly followed.

2. EKMS Inspectors. Designation requirements and EKMS inspections are outlined in references (a) and (b). Additional Marine Corps inspection requirements include:

a. EKMS Inspectors must achieve inspector certification within six months of appointment to commands with ISIC responsibilities.

b. Copies of the inspectors' recommendation letters (from NCMS) and designation letters (from commands) must be submitted to the EKMS Program office annually or as requested.

c. On a semiannual basis, ISICs must provide to the EKMS Program Manager a list of EKMS accounts in their area of responsibility (AOR).

d. Gunnery Sergeants through Master Gunnery Sergeants and civilians (General Service) grades 9 through 14 may serve as EKMS inspectors.

3. EKMS Inspections. All EKMS inspections are conducted in accordance with reference (b). Inspection reports must be submitted to the EKMS Program office upon completion, no later than 21 days after the inspection. All EKMS inspection reports shall be prepared using the sample EKMS Inspection Report found in Appendix B.

4. EKMS Inspection Procedures. EKMS inspections should be unannounced; however, on occasions it may not be prudent or economically feasible to conduct unannounced inspections without first informing the EKMS Manager of the inspector's arrival date and time. ISICs shall release a naval message addressed to subordinate EKMS accounts, which identifies certified EKMS Inspectors. At the onset of the inspection, the EKMS Manager must:

a. Ensure that an in-brief is given to the Commanding Officer (CO), Staff CMS Responsibility Officer (SCMSRO), or a duly appointed authorized official.

b. Positively identify EKMS Inspectors by comparing the United States government issued identification card (i.e., Common Access Card (CAC) or DD Form 2, Armed Forces Identification Card [Active, Reserve, and Civilian]) against the on-file naval message or Joint Personnel Adjudication System (JPAS) printout.

c. Upon completion of the EKMS inspection, the EKMS Manager must ensure that an out-brief is given to the CO, SCMSRO, or duly authorized official.

Chapter 4

COMSEC Equipment Management

1. General. Positive accountability and visibility of COMSEC equipment will be adhered to from cradle to grave (i.e., life cycle assessment). Before using COMSEC equipment, EKMS Managers must have a thorough understanding of the equipment capabilities and lifecycle. This chapter expounds on reference (k) and addresses COMSEC management, equipment allowances, maintenance, and disposition of COMSEC equipment.

2. Equipment Management

a. Commands must submit COMSEC Controlled Cryptographic Item (CCI) disposition requests to MARCORLOGCOM using the Recoverable Item Report (WIR) On-Line Process Handler (WOLPH) system. Requests for disposition of COMSEC equipment aligns to one of two status categories: (1) Excess or non-rated, (2) Unserviceable.

(1) Excess COMSEC Equipment T/E or non-rated. Commands must submit COMSEC/CCI disposition requests to MARCORLOGCOM using WIR WOLPH.

(2) Unserviceable COMSEC Equipment. COMSEC equipment can only be deemed unserviceable and requiring replacement by appropriate maintenance technicians acting in accordance with references (m) and (n). The requesting unit must submit for disposition and replacement using WIR WOLPH system to MARCORLOGCOM.

Note 1: Units must affix a NAVMC 1018 tag to excess and unserviceable before shipping the equipment to MARCORLOGCOM.

Note 2: MARCORLOGCOM will provide disposition instructions for shipping of equipment to requesting units.

b. Marine Corps Ground Assets T/E Equipment ("Green Dollar Gear"). COMSEC/CCI requires strict accountability by EKMS Managers and cryptographic equipment users. EKMS Managers will ensure that CCI is centrally accounted for at the Central Office of Record (COR) by serial number or quantity depending on the equipment's Accounting Legend Code (ALC). Additionally, EKMS Managers must reconcile quantities with established supply processes using Requisition and Invoice/Shipping Document (DD Form 1149), Single Line-Item Requisition Document (DD Form 1348), or the COMSEC Material Report (SF-153) to ensure that the Accountable Property System of Record (APSR)/Global Combat Support System-Marine Corps (GCSS-MC) accurately reflects on-hand and in-service quantities by the Unit Identification Code (UIC) in accordance with reference (l).

c. Naval Appropriation and Air/Aviation Assets (Non-T/E systems) ["Blue Dollar Gear"]. COMSEC equipment aboard Marine Corps aircraft is U.S. Navy owned and controlled. Disposition and replacement of "Blue Dollar Gear" is conducted jointly by NCMS and Naval Supply Weapons Systems Support (WSS), with support from the Marine Aviation Logistics Squadron (MALS).

d. Procedures for requesting disposition and replacement of "Blue Dollar" COMSEC equipment is as follows:

(1) The MALS generates and assigns, using the Naval Aviation Logistics Command Operating Maintenance Information System (NALCOMIS), a document number for the replaced "Blue Dollar" COMSEC equipment.

(2) Once a replacement document number is assigned in NALCOMIS, the EKMS Manager must request disposition and replacement from NCMS (cc: Naval Inventory Control Point (NAVICP)) via naval message. The EKMS Manager must also ensure that the assigned document number is included in the sample disposition request message, Appendix C.

(3) NCMS will provide disposition instructions for inoperative "Blue Dollar" COMSEC equipment and Naval Supply WSS, using the NALCOMIS assigned document number, will provide replacement "Blue-Dollar" equipment.

3. Equipment Allowances

a. Equipment Procurement. In accordance with reference (e), commands submitting requisitions for COMSEC equipment must include their organizations Logistics (G-4) and the Communications-Electronics (G-6) departments. All COMSEC equipment requisition requests must be submitted through CD&I and MCSC, and must include the communication system's capability requirements. COMSEC equipment is only procured or increased by submitting a Universal Needs Statement (UNS) in accordance with reference (o) or following the Table of Organization and Equipment Change Request (TOECR) process in accordance with reference (e).

b. Modification of COMSEC Equipment Allowance. The only authorized method to modify (increase or reduce) COMSEC equipment allowances is through the TOECR process in accordance with reference (e).

c. Transfer Authority for COMSEC Equipment. Transfer authority is a formal request and response to move COMSEC equipment between two Marine Corps EKMS accounts. All transfer requests are documented using naval messages. Transfer requests must include EKMS account numbers (gaining and losing), duration, and reason for COMSEC equipment transfer. The participating commands shall adjust supply records accordingly.

(1) Movement of COMSEC Equipment within Marine Forces (MARFOR) or Marine Expeditionary Force (MEF). Transfer authority resides with the Commanding General (AC/S, G-4/G-6) level within the confines of their Command to include between their respective subordinate unit COMSEC accounts. MARFOR commanders, Commanding Generals of MEFs, Divisions, Marine Air Wings (MAW), and Marine Logistic Groups (MLG) manage COMSEC equipment and related devices in COMSEC accounts of their subordinate units. All COMSEC equipment movements must be captured in the units' APSR, Consolidated Memorandum Receipt (CMR), and/or GCSS-MC in accordance with reference (1).

(2) Movement of COMSEC equipment between MARFORs or MEFs. If the movement of COMSEC equipment is between MEFs (in the same MARFOR), that MARFOR is the transfer authority. If the movement is between two MARFORs or MEFs of more than one MARFOR, transfer authority will reside with the EKMS

Program Office and will be executed via official correspondence from MARCORLOGCOM. Ensure transactions are captured within the units' APSR, CMR, and/or GCSS-MC in accordance with reference (l).

(3) Movement of COMSEC Equipment Outside of Marine Corps' Inventory. The movement of COMSEC equipment outside the Marine Corps' inventory is authorized only by MARCORLOGCOM in coordination with MCSC and NCMS. All authorized COMSEC equipment transactions outside the Marine Corps' inventory must be documented and communicated to MARCORLOGCOM, MCSC, and NCMS using naval messages.

(4) Movement of COMSEC Equipment Between Supporting Establishment Commands and HQMC Activities. The movement of COMSEC equipment between Supporting Establishment Commands and HQMC Activities is authorized only by HQMC C4. Ensure transactions are captured within the units' APSR, CMR, and/or GCSS-MC in accordance with reference (l).

4. Equipment Maintenance. All equipment maintenance actions taken to retain or restore COMSEC equipment to an operational status will be performed by authorized maintenance service personnel in accordance with applicable technical manuals and instructions in accordance with references (m) and (n).

a. Software Version Control. Modern cryptographic equipment has embedded and upgradable software capability. MCSC is the responsible agent for establishing software baselines and configuration management for modern cryptographic equipment used within the Marine Corps.

b. Equipment Deemed Unserviceable. All equipment deemed unserviceable or unrepairable by appropriate maintenance personnel will be processed for disposition and/or replacement in accordance with reference (q) and paragraph 4004 of this Order.

5. Disposition Instructions. This section provides instructions for COMSEC equipment disposition. EKMS Managers must ensure that close coordination exist between required entities (i.e., MCSC, MARCORLOGCOM, and NCMS).

a. Secondary Reparable (SECREP). SECREP, defined as specified items, which are not operationally functional by themselves and are components of other associated items.

Note: All GCSS-MC Service Request (SR) numbers must be annotated on the COMSEC Material Report (SF-153) in the remarks column. The annotation will help all entities improve visibility and tracking of COMSEC equipment.

b. Principal End Items (PEI). PEI is one item or a combination of items configured to meet Marine Corps defined mission capability. For example, a Structured Wireless-Aware Network (SWAN) is a PEI, which uses a COMSEC device as a component to be mission capable.

Note: After SRs are initiated, ensure that an appropriate level, qualified maintenance technician inspects and attempts the repair of COMSEC equipment. When maintenance technicians find COMSEC equipment un-repairable or repair uneconomical, a WIR must be submitted to MARCORLOGCOM via the WIR WOLPH system.

c. Marine Aviation Organizations. COMSEC equipment not authorized by or established in a T/E and in direct support of "Blue Dollar" Navy (Non-T/E Systems and Aircraft) must follow procedures as outlined in reference (a).

MCO 2281.1A
11 Jun 2014

2280
DD MMM YYYY

From: (*Individual appointed as ISIC*)
To: (*Commanding General, SCMSRO or AC/S G6 as applicable*)

Subj: ACKNOWLEDGEMENT AND ACCEPTANCE OF ISIC APPOINTMENT

1. I hereby acknowledge my appointment as ISIC, and I will execute my duties as outlined in references (a) through (c).
2. I certify that I understand my duties and responsibilities.

X. X. XXXXXXXXXXXX

Copy to: EKMS Program Office

APPENDIX B

SAMPLE EKMS INSPECTION REPORT

2280
DD MMM YYYY

From: EKMS *Inspector*
To: *Command Inspected*
Via: *Immediate Superior in Command (If required)*

Subj: EKMS INSPECTION REPORT

Ref: (a) EKMS 1 Series
(b) EKMS 3 Series
(c) Physical Security Survey dtd (enter date here)

1. Name of Command: XXXXXXXXXXXXXXXXXXXX
EKMS Manager: XXXX X. X. XXXXXXXX
Alternate Manager(s): XXXX X. X. XXXXXXXX
EKMS Account #: XXXXXXXX
Total Line Items: XXXX
Total Quantity XXXX
Records Clearance
Certification Date: XXXXXXXX
Central Office of
Record: XXXXXXXX
Date Inspected: XXXXXXXX
Date Last Inspected: XXXXXXXX
Inspector: XXXX X. X. XXXXXXXX
Inspector Date Cert: XXXXXXXX
Servicing ISIC/IUC: XXXXXXXXXXXXXXXXXXXX
Servicing A&A Team: XXXXXXXXXXXXXXXXXXXX
Last A&A Visit: XXXXXXXX
Last Town Hall Date: XXXXXXXX

2. As prescribed by reference (a), and in accordance with ref (b), an EKMS inspection was conducted on (enter Account Name here) and three Local Elements. Evaluation of the command/unit *inspected* is (**SATISFACTORY** or **UNSATISFACTORY**) (enter comments to substantiate evaluation).

3. In accordance with references (a) and (c), the facility meets all physical security standards to install, maintain, operate, and store classified COMSEC material. Continued approval to hold classified COMSEC material up the level of (SECRET/TOP SECRET) is renewed for 24 months. This certification shall become invalid if there are any alterations that significantly change the physical characteristics of this facility, there is evidence of penetration or tampering of the facility, or if the EKMS spaces are relocated.

4. The findings for the account are as follows: (X) COMSEC Incident, (X) Practice Dangerous to Security (PDS), and (X) Administrative Errors.

5. EKMS Account

Question 000: (Entire question with references)

Finding: (CIR/PDS/ADMIN) as applicable

Recommendation:

6. Local Element (enter name here):

Question 000: (Entire question with references)

Finding: (CIR/PDS/ADMIN) as applicable

Recommendation:

7. Additional comments.

8. The command must provide a written report describing the actions taken to correct discrepancies or findings. Forward the written report to the ISIC within 30 days from the date of this report.

9. The information contained herein relates to the internal practices of the DON and the U.S. Marine Corps. This report is not releasable, nor may its contents be disclosed in whole or in part, without prior approval of (the inspecting command), CMC (C4 CY) or NCMS. Requests for inspection reports, portions thereof, or correspondence related thereto, from a source external to the DON shall be promptly referred to CMC (C4 CY). Holders of this report shall strictly adhere to this caveat.

(Enter Inspector's name)

APPENDIX C

SAMPLE DISPOSITION OF "BLUE DOLLAR" COMSEC EQUIPMENT MESSAGE

R DDHMMZ MMM YY
FM (Command's PLA)
TO NCMS WASHINGTON DC(UC)
CC NAVSUP WEAPON SYSTEMS SUPPORT PHILADELPHIA PA(UC) OR
NAVSUP WEAPON SYSTEMS SUPPORT MECHANICSBURG PA(UC)
SPAWARSYSCEN ATLANTIC CHARLESTON SC(UC)
CMIO NORFOLK VA(UC)
CHAIN OF COMMAND/ISIC

UNCLAS

MSGID/GENADMIN/COMMAND NAME//

SUBJ/REQUEST FOR DISPOSITION AND REPLACEMENT OF EMBEDDED COMSEC//

REF/A/DOC/NCMS/05APR2010//

AMPN/REF A IS EKMS-5 (SERIES).//

POC/XXXXXXX, X.X./RANK/COMMAND/TEL: COMM AND DSN/EMAIL ADDRESS//

GENTEXT/RMKS/1. IAW REF A, (COMMAND NAME AND ACCOUNT NUMBER) REQUESTS DISPOSITION AND REPLACEMENT FOR (S/T OF EMBEDDED COMSEC). THE FOLLOWING INFORMATION IS PROVIDED:

REPLENISHMENT DOCUMENT:

SHORT TITLE	SER	NSN	REQUISITION NUMBER
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TURN-IN DOCUMENT:

SHORT TITLE	SER	NSN	REQUISITION NUMBER
-------------	-----	-----	--------------------

2. ACCT XXXXXX IS A FORWARD DEPLOYED OR OVERSEAS UNIT. SHIP, VIA CONSTANT SURVEILLANCE CARRIER, FROM SOURCE OF SUPPLY (CMIO) TO AIR MOBILITY COMMAND (AMC) ARMY POST OFFICE EUROPE (APOE) FOR FOLLOW-ON TRANSPORTATION TO REQUESTING UNIT: SHIP TO (APPLICABLE ADDRESS FOR REGION, EXAMPLE FOLLOWS):

V55576 MARINE AVN LOGISTICS SQDN OEF
COMMANDING GENERAL, 2D MAW (FWD)
ATTN: EKMS MANAGER OEF BASTION MAIN OPERATING BASE
VAN PAD DSN - 318-357-3408
BASTION AF 09510

3. VIA SHIPMENT ADDRESS: (USE APPLICABLE APOE FOR REGION):

FY9125 436 APS TRTC
BLDG 550 CP 302-677-4345
550 ATLANTIC ST
DOVER AFB DE 19902-5061

4. POINT OF CONTACT, AS LISTED ABOVE.//
BT