

**Draft Standard for**

**Local and metropolitan area networks—**

# **Media Access Control (MAC) Security**

## **Amendment: Galois Counter Mode— Advanced Encryption Standard–256 (GCM-AES-256) Cipher Suite**

Sponsor

**LAN/MAN Standards Committee**  
of the  
**IEEE Computer Society**

### **Prepared by the Security Task Group of IEEE 802.1**

This initial draft has been prepared by the Task Group Chair and reviewed by the task group as part of the process of discussing the scope and purpose of a proposed P802.1AEbn PAR .

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# Editors' Foreword

## <<Notes>>

<<Throughout this document, all notes such as this one, presented between angle braces, are temporary notes inserted by the Editors for a variety of purposes; these notes and the Editors' Foreword will all be removed prior to publication and are not part of the normative text.>>

## <<Comments and participation in 802.1 standards development

Comments on this draft are encouraged. **PLEASE NOTE: All issues related to IEEE standards presentation style, formatting, spelling, etc. are routinely handled between the 802.1 Editor and the IEEE Staff Editors prior to publication, after balloting and the process of achieving agreement on the technical content of the standard is complete.** Readers are urged to devote their valuable time and energy only to comments that materially affect either the technical content of the document or the clarity of that technical content. Comments should not simply state what is wrong, but also what might be done to fix the problem.>>

Full participation in the development of this draft requires individual attendance at IEEE 802 meetings. Information on 802.1 activities, working papers, and email distribution lists etc. can be found on the 802.1 Website:

<http://ieee802.org/1/>

Use of the email distribution list is not presently restricted to 802.1 members, and the working group has had a policy of considering ballot comments from all who are interested and willing to contribute to the development of the draft. Individuals not attending meetings have helped to identify sources of misunderstanding and ambiguity in past projects. Non-members are advised that the email lists exist primarily to allow the members of the working group to develop standards, and are not a general forum. All contributors to the work of 802.1 should familiarize themselves with the IEEE patent policy and anyone using the mail distribution will be assumed to have done so. Information can be found at <http://standards.ieee.org/db/patents/>

Comments on this document may be sent to the 802.1 email exploder, to the Editor, or to the Chairs of the 802.1 Working Group and Security Task Group.

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## <<Overview: Draft text and accompanying information

This document currently comprises:

A cover page, identical to the title page.

The editors' introductory notes to each draft, briefly summarizing the progress and focus of each successive draft.

The title page for this amendment including an Abstract and Keywords. This title page will be retained for the period that the amendment is published as a separate document.

The amendment proper, documented in the usual form for amendments to 802 standards; i.e., as an explicit set of editing instructions that, if correctly applied to the text of 802.1Q, will create a corrected document.

An Annex Z comprising the editors' discussion of issues. This annex will be deleted from the document prior to sponsor ballot.

Editors' notes throughout the document, including requests for comment on specific issues and pointing deficiencies in the current draft.

IEEE boilerplate text.

The records of participants in the development of the standard, the introduction to 802 standards, and the introduction to this revision of the standard are not included, and will be added at an appropriate time.

During the early stages of draft development, 802.1 editors have a responsibility to attempt to craft technically coherent drafts from the resolutions of ballot comments and the other discussions that take place in the working group meetings. Preparation of drafts often exposes inconsistencies in editor's instructions or exposes the need to make choices between approaches that were not fully apparent in the meeting. Choices and requests by the editors' for contributions on specific issues will be found in the editors' introductory notes to the current draft, at appropriate points in the draft, and in Annex Z. Significant discussion of more difficult topics will be found in the last of these.

The ballot comments received on each draft, and the editors' proposed and final disposition of comments on working group drafts, are part of the audit trail of the development of the standard and are available, along with all the revisions of the draft on the 802.1 website (for address see above).

During the early stages of draft development the proposed text can be moved around a great deal, and even minor rearrangement can lead to a lot of 'change', not all of which is noteworthy from the point of the reviewer, so the use of automatic change bars is not very effective. In this draft change bars have been manually applied, with a view to drawing the readers attention to the most significant areas of change. Readers interested in viewing every change are encouraged to used Adobe Acrobat to compare the document with their selected prior draft.

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**<<Editor's Introduction to the current draft.**

P802.1AEbn/D0.3 was prepared by the Task Group Chair following discussion of an initial draft during the task group teleconference held to discuss the proposed PAR. It is anticipated that this draft, or a further revision taking into account comments received during the November 2010 plenary meeting, will be subject to a first task group ballot following approval of the (possibly amended PAR).

This draft (0.3) included items previously discussed by the task group including: (a) the correction to the Cipher Suite Identifier; (b) the 10.7.22 capability to read the nextPN (previously recorded in Annex Z). NIST SP 800-38-D is now used as the prime GCM reference, its use meant that the terminology mismatch issues previously identified/feared when changing from the earlier reference do not arise and the update of the prior 14.5 and drafting on the new 14.6 (a word for word copy apart from the key length K) became trivial. The proposed Cipher Suite Identifier for GCM-AES-256 has therefore been included. If there are any technical changes introduced to the Cipher Suite during the course of the project this assigned value will be changed and the current value reserved/deprecated.

>>

**<<Editor's Introduction to prior drafts (excerpts of continuing relevance).**

Prior drafts prepared to facilitate discussion on the proposed PAR used the designation P802.1AEa.

>>

## <<Project Authorization Request, Scope, Purpose, and Five Criteria

A proposed PAR (Project Authorization Request) for this project has been pre-circulated as required by P802 rules. The Scope, Purpose, and 5 Criteria below reflect that pre-circulated document.

### Scope of Proposed Project:

This standard specifies the optional use of the GCM-AES-256 Cipher Suite as well as the Default Cipher Suite, GCM-AES-128.

### Purpose of Proposed Project:

This standard specifies the optional use of AES-256 for MAC Security using GCM (Galois Counter Mode) and will update the 802.1AE-2006 references to support that specification.

### Need for the Project:

There is significant broad interest in the use of 256-bit AES data integrity and confidentiality with MAC Security. To promote interoperability and ensure Cipher Suite quality, IEEE Standard 802.1AE requires that the Cipher Suites used while claiming conformance are limited to those specified in the standard. This project will add the GCM-AES-256 Cipher Suite as an option.

## 1. Broad Market Potential

*A standards project authorized by IEEE 802 shall have a broad market potential. Specifically, it shall have the potential for:*

- a) *Broad sets of applicability.*  
This amendment is applicable to all networks that are currently using or planning to use IEEE 802.1AE, MACsec. The addition of this cipher suite will broaden the applicability of IEEE 802.1AE to appeal to those customers desiring the use of the stronger cipher suite.
- b) *Multiple vendors and numerous users*  
A number of major equipment providers have indicated support for this amendment.
- c) *Balanced costs (LAN versus attached stations)*  
There is no imbalance of cost created by this amendment

## 2. Compatibility

*IEEE 802 defines a family of standards. All standards shall be in conformance with the IEEE 802.1 Architecture, Management and Interworking documents as follows: 802 Overview and Architecture, 802.1D, 802.1Q and parts of 802.1f. If any variances in conformance emerge, they shall be thoroughly disclosed and reviewed with 802.*

*Each standard in the IEEE 802 family of standards shall include a definition of managed objects which are compatible with systems management standards.*

This will be fit within the framework in IEEE 802.1AE-2006. There are no changes to the frame formats. There is no change to the conformance clause.

## 3. Distinct Identity

*Each IEEE 802 standard shall have a distinct identity. To achieve this, each authorized project shall be:*

- a) *Substantially different from other IEEE 802 standards.*

1 IEEE 802.1AE is already a recognized and established standard, applicable to security not covered  
2 by other 802 standards and currently lacking a 256-bit Cipher Suite, although the future need for  
3 such a Cipher Suite was recognized in the development of 802.1AE-2006 and in 802.1X-2010.

- 4 b) *One unique solution per problem (not two solutions to a problem).*

5 This project enhances IEEE 802.1AE to meet emerging and additional needs, it does not duplicate  
6 existing capabilities.

- 7 c) *Easy for the document reader to select the relevant specification.*

8 IEEE Std 802.1AE is already an established reference for MAC Security.

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11 *For a project to be authorized, it shall be able to show its technical feasibility. At a minimum, the proposed*  
12 *project shall show:*

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15 a) *Demonstrated system feasibility.*

16 Characteristics of GCM-AES are already well known. GCM-AES 256 has already been referenced  
17 by RFC 2116.

- 18 b) *Proven technology, reasonable testing.*

19 Technology for testing cryptographic modes of operations is well advanced.

- 20 c) *Confidence in reliability.*

21 GCM-AES has been adopted by NIST. GCM-AES-256 is expected to pose no new reliability  
22 challenges.

- 23 d) *Coexistence of 802 wireless standards specifying devices for unlicensed operation.*

24 Not applicable.

## 25 26 27 28 29 **5. Economic Feasibility**

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31 *For a project to be authorized, it shall be able to show economic feasibility (so far as can reasonably be*  
32 *estimated), for its intended applications. At a minimum, the proposed project shall show:*

- 33  
34 a) *Known cost factors, reliable data.*

35 The economic factors for adoption of this technology outweigh the estimated costs of implementing  
36 the solution.

- 37 b) *Reasonable cost for performance.*

38 The economic factors for adoption of this technology outweigh the estimated costs of implementing  
39 the solution.

- 40 c) *Consideration of installation costs.*

41 The economic factors for adoption of this technology outweigh the estimated costs of implementing  
42 the solution.

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48 **<<Editors' final checklist (items noted in development, to be applied to final text.**

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51 The published standards are inconsistent and a bit of a mess when it comes to PDF bookmarks, this makes  
52 using them rather than final working group text difficult. P802.1p/D9 was very good. In particular it provides  
53 bookmarks for all figures at the end of a clause (see clause 7 for an example), need to copy that example.

54 >>





DRAFT Amendment to

**P802.1AEbn/D0.3**  
IEEE Std 802.1AE–2006  
**November 5, 2010**

**Draft Standard for**

**Local and metropolitan area networks—**

# **Media Access Control (MAC) Security**

## **Amendment: Galois Counter Mode— Advanced Encryption Standard—256 (GCM-AES-256) Cipher Suite**

Sponsor

**LAN/MAN Standards Committee**  
of the  
**IEEE Computer Society**

Prepared by the Security Task Group of IEEE 802.1

**Abstract:** This amendment specifies the GCM-AES-256 Cipher Suite as an option in addition to the existing mandatory to implement Default Cipher Suite, GCM-AES-128.

**Keywords:** authorized port, confidentiality, data origin authenticity, integrity, LANs, local area networks, MAC Bridges, MAC security, MAC Service, MANs, metropolitan area networks, port based network access control, secure association, security, transparent bridging.

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## Introduction

**This introduction is not part of IEEE Std 802.1AE, IEEE Standard for Local and Metropolitan Area Networks: Media Access Control (MAC) Security.**

The first edition of IEEE Std 802.1AE was published in 2006. This first amendment to that standard adds the option of using the GCM-AES-256 Cipher Suite.

## Relationship between IEEE Std 802.1AE and other IEEE Std 802 standards

IEEE Std 802.1X-2010 specifies Port-based Network Access Control, and provides a means of authenticating and authorizing devices attached to a LAN, and includes the MACsec Key Agreement protocol (MKA) necessary to make use of IEEE 802.1AE.

This standard is not intended for use with IEEE Std 802.11 Wireless LAN Medium Access Control. An amendment to that standard, IEEE Std 802.11i-2004, also makes use of IEEE Std 802.1X, thus facilitating the use of a common authentication and authorization framework for LAN media to which this standard applies and for Wireless LANs.

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## Interpretations

Current interpretations can be accessed at the following URL: <http://standards.ieee.org/reading/ieee/interp/index.html>.

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## Contents

Editors' Foreword .....	c
1.Overview .....	2
1.1 Introduction .....	2
1.2 Scope .....	2
2.Normative references .....	3
6.Secure provision of the MAC Service .....	4
6.7 MACsec connectivity .....	4
7.Principles of secure network operation .....	5
8.MAC Security Protocol (MACsec) .....	6
10.Principle of MAC Security Entity (SecY) operation .....	7
11.MAC Security in Systems .....	8
11.7 MACsec in Provider Bridged Networks .....	8
14.Cipher Suites .....	9
14.5 Default Cipher Suite (GCM–AES–128) .....	9
14.6 Default Cipher Suite (GCM–AES–256) .....	10
Annex BBibliography .....	11
(informative)Commentary .....	12

## Figures

## Tables

Table 14-1 MACsec Cipher Suites.....	9
--------------------------------------	---



## Draft Standard for Local and Metropolitan Area Networks—

# Media Access Control (MAC) Security Amendment: Galois Counter Mode— Advanced Encryption Standard—256 (GCM-AES-256) Cipher Suite

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## Editorial Note

This amendment specifies changes to IEEE Std 802.1AE-2006. Text shown in bold italics in this amendment defines the editing instructions necessary to changes to this base text. Three editing instructions are used: *change*, *delete*, and *insert*. *Change* is used to make a change to existing material. The editing instruction specifies the location of the change and describes what is being changed. Changes to existing text may be clarified using ~~strikeout~~ markings to indicate removal of old material, and underscore markings to indicate addition of new material). *Delete* removes existing material. *Insert* adds new material without changing the existing material. Insertions may require renumbering. If so, renumbering instructions are given in the editing instruction. Editorial notes will not be carried over into future editions of IEEE Std. 802.1Q.

## 1. Overview

*This amendment makes no changes to the initial text of Clause 1 Overview.*

### 1.1 Introduction

*Change the 4th paragraph as follows:*

To deliver these benefits, MACsec has to be used in conjunction with appropriate policies for higher-level protocol operation in networked systems, an authentication and authorization framework, and network management. IEEE [Std 802.1X](#) ~~P802.1af<sup>TM</sup> [B2]~~<sup>1</sup> provides authentication and cryptographic key distribution.

### 1.2 Scope

*Change bullet (i) as follows:*

- i) Specifies the interface/exchanges between a SecY and its associated and collocated MAC Security Key Agreement Entity (KaY, IEEE [Std 802.1X](#) ~~P802.1af [B2]~~) that provides and updates cryptographic keys.

*Change bullet (o) as follows:*

- o) Specify how the relationships between MACsec protocol peers are discovered and authenticated, as supported by key management or key distribution protocols, but makes use of IEEE [Std 802.1X](#) ~~P802.1af Key Agreement for MAC security~~ to achieve these functions.

## 2. Normative references

*Insert the following references at the appropriate point:*

NIST SP 800-38D, Nov 2007, Recommendation for Block Cipher Modes of Operation: Galois/Counter Mode (GCM) and GMAC.<sup>1</sup>

IEEE Std 802.1X-2010, IEEE Standards for Local and Metropolitan Area Networks: Port-based Network Access Control.

IEEE Std 802.1Q, IEEE Standards for Local and Metropolitan Area Networks: Virtual Bridged Local Area Networks.

*Delete the following reference and the accompanying footnote:*

Galois Counter Mode of Operation (GCM), David A. McGrew, John Viega.<sup>4</sup>

*Delete the following references:*

IEEE Std 802.1Q-2005, IEEE Standards for Local and Metropolitan Area Networks: Virtual Bridged Local Area Networks.

IEEE Std 802.1ad-2005, IEEE Standards for Local and Metropolitan Area Networks: Virtual Bridged Local Area Networks - Amendment 4: Provider Bridges.

IEEE Std 802.1X-2004, IEEE Standards for Local and Metropolitan Area Networks: Port Based Network Access Control.

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<sup>1</sup>This document is available at <http://csrc.nist.gov/publications/nistpubs/800-38D/SP-800-38D.pdf>

1       **6. Secure provision of the MAC Service**

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**6.7 MACsec connectivity**

*In the first paragraph replace:*

“IEEE P802.1af”

*with:*

“IEEE Std 802.1X”

## 7. Principles of secure network operation

*In bullet (d) replace:*

“IEEE P802.1af”

*with:*

“IEEE Std 802.1X”

### 7.1.2 Use of the secure MAC Service by bridges

*In NOTE 1 replace:*

“IEEE 802.1ad-2005”

*with:*

“IEEE Std 802.1Q”

### 7.3.1 Client policies

*In NOTE 1 replace:*

“IEEE P802.1af”

*with:*

“IEEE Std 802.1X”

### 7.3.2 Use of the secure MAC Service by bridges

*In NOTE 1, NOTE 2, and NOTE 3 replace:*

“IEEE 802.1ad-2005”

*with:*

“IEEE Std 802.1Q”

*In bullet (d) delete:*

“(IEEE 802.1ad-2005 only)”.

*In NOTE 4 replace:*

“IEEE Std 802.1Q, and 802.1ad-2005.”

*with:*

“ and IEEE Std 802.1Q.”

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## **8. MAC Security Protocol (MACsec)**

### **8.1.3 Interoperability requirements**

*In the third paragraph replace:*

“IEEE 802.1ad-2005”

*with:*

“IEEE Std 802.1Q”

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## 10. Principle of MAC Security Entity (SecY) operation

### 10.7.22 Transmit SA status

*Insert a further bullet (e) directly after the existing bullet (d), as follows:*

- e) nextPN (10.6, 10.6.5)

1       **11. MAC Security in Systems**  
2

3  
4       **11.7 MACsec in Provider Bridged Networks**  
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6       *In the first paragraph replace:*  
7

8       “Provider Bridges are specified in the IEEE Std 802.1ad amendment to IEEE Std 802.1Q. Provider Bridges  
9       enable service providers”

10  
11       *with:*  
12

13       “Provider Bridges (IEEE Std 802.1Q) enable service providers”  
14

15       *In the NOTE, in Figure 11-14, and in the paragraph describing that figure replace:*  
16

17       “IEEE 802.1ad-2005”  
18

19       *with:*  
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21       “IEEE Std 802.1Q”  
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## 14. Cipher Suites

*Modify Table 14-1 as follows:*

**Table 14-1—MACsec Cipher Suites**

Cipher Suite # <u>Identifier</u>	Cipher Suite Name	Services provided		Mandatory/Optional	Defining Clause
		Integrity without confidentiality	Integrity and confidentiality		
<del>00-80-02-00-01-00-00-01</del> <del>00-80-C2-00-01-00-00-01</del>	GCM—AES—128	Yes	Yes	Mandatory	14.5
<u>00-80-C2-00-01-00-00-02</u>	<u>GCM-AES-256</u>	<u>Yes</u>	<u>Yes</u>	<u>Optional</u>	<u>14.6</u>

*Delete the NOTE “Currently, ... does not include any optional Cipher suites” following Table 14-1.*

*Add the following NOTE after the paragraph beginning “Table 14-1 assigns a Cipher Suite reference number for use in protocol identification within a MACsec context”:*

NOTE— In IEEE Std 802.1AE-2006 (the first edition of this standard) the Cipher Suite Identifier for GCM—AES—128 was incorrectly shown as 00-80-02-00-01-00-00-01 in Table 14-1. Prior to the inclusion of GCM—AES—256, GCM—AES—128 was the only conformant Cipher Suite. IEEE Std 802.1X uses a reserved encoding for the Default Cipher Suite rather than the Cipher Suite Identifier to identify GCM—AES—128.

*Change clause 14.5 as follows:*

### 14.5 Default Cipher Suite (GCM—AES—128)

The Default Cipher Suite uses the Galois/Counter Mode of ~~Operation~~ operation with the AES-128 symmetric block cipher, as specified in this clause by reference to the terms *K*, *IV*, *A*, *P*, *C*, *T* used in ~~section 2.1 of the GCM specification (GCM) as submitted to NIST~~ [NIST SP 800-38D](#).

*K* is the 128 bit SAK. The 64 most significant bits of the 96-bit *IV* are the octets of the SCI, encoded as a binary number (9.1). The 32 least significant bits of the 96--bit *IV* are the octets of the PN, encoded as a binary number (9.1). *T* is the ICV, and is 128 bits long. When the bit-strings *A*, *P*, and *C* are specified in terms of octet strings, earlier octets compose earlier bits, and more significant bits in each octet are earlier.

NOTE—The bit strings obtained by transforming MAC Address and data octets using these rules do not correspond to 802.3 'wire order' for frame transmission.

When the Default Cipher Suite is used for Integrity Protection

- *A* is the Destination MAC Address, Source MAC Address, and the octets of the SecTAG and User Data concatenated in that order.

- 1 —  $P$  is null.
- 2 — The Secure Data is the octets of the User Data, without modification.

3  
4 When the Default Cipher Suite is used for Confidentiality Protection without a confidentiality offset

- 5
- 6 —  $A$  is the Destination MAC Address, Source MAC Address, and the octets of the SecTAG concatenated in that order.
- 7
- 8 —  $P$  is the octets of the User Data.
- 9 — The Secure Data is  $C$ .

10  
11 When the Default Cipher Suite is used for Confidentiality Protection with a confidentiality offset

- 12
- 13 —  $A$  is the Destination MAC Address, Source MAC Address, and the octets of the SecTAG and the first confidentialityOffset (10.7.24) octets of the User Data concatenated in that order.
- 14
- 15 —  $P$  is the remaining octets of the User Data.
- 16 — The Secure Data is the first confidentialityOffset octets of the User Data concatenated with  $C$ , in that order.
- 17

18 **Add clause 14.6 as follows:**

## 19 20 21 **14.6 Default Cipher Suite (GCM–AES–256)**

22  
23 GCM-AES-256 uses the Galois/Counter Mode of operation with the AES-256 symmetric block cipher, as  
24 specified in this clause by reference to the terms  $K$ ,  $IV$ ,  $A$ ,  $P$ ,  $C$ ,  $T$  used in NIST SP 800-38D.

25  
26  $K$  is the 256 bit SAK. The 64 most significant bits of the 96-bit  $IV$  are the octets of the SCI, encoded as a  
27 binary number (9.1). The 32 least significant bits of the 96-bit  $IV$  are the octets of the PN, encoded as a  
28 binary number (9.1).  $T$  is the ICV, and is 128 bits long. When the bit-strings  $A$ ,  $P$ , and  $C$  are specified in  
29 terms of octet strings, earlier octets compose earlier bits, and more significant bits in each octet are earlier.

30  
31 NOTE—The bit strings obtained by transforming MAC Address and data octets using these rules do not correspond to  
32 802.3 'wire order' for frame transmission.

33  
34 When the Default Cipher Suite is used for Integrity Protection

- 35
- 36 —  $A$  is the Destination MAC Address, Source MAC Address, and the octets of the SecTAG and User  
37 Data concatenated in that order.
- 38 —  $P$  is null.
- 39 — The Secure Data is the octets of the User Data, without modification.
- 40

41 When the Default Cipher Suite is used for Confidentiality Protection without a confidentiality offset

- 42
- 43 —  $A$  is the Destination MAC Address, Source MAC Address, and the octets of the SecTAG  
44 concatenated in that order.
- 45 —  $P$  is the octets of the User Data.
- 46 — The Secure Data is  $C$ .
- 47

48 When the Default Cipher Suite is used for Confidentiality Protection with a confidentiality offset

- 49
- 50 —  $A$  is the Destination MAC Address, Source MAC Address, and the octets of the SecTAG and the first  
51 confidentialityOffset (10.7.24) octets of the User Data concatenated in that order.
- 52 —  $P$  is the remaining octets of the User Data.
- 53 — The Secure Data is the first confidentialityOffset octets of the User Data concatenated with  $C$ , in that  
54 order.

## Annex B

(informative)

### Bibliography

*Delete bibliographical reference [B2] and the accompanying footnote as follows, renumbering other bibliographical references and updating cross-references as necessary.*

~~[B2] IEEE P802.1af, Draft Standard for Key Agreement for MAC Security.<sup>2</sup>~~

*Insert the following bibliographical references, renumbering other bibliographical references and updating cross-references as necessary.:*

[B2] The Galois/Counter Mode of Operation (GCM), David A. McGrew and J. Viega. May 31, 2005.<sup>3</sup>

[B10] IETF RFC 5116, An Interface and Algorithms for Authenticated Encryption, McGrew, D., January 2008.

[B11] The Security and Performance of the Galois/Counter Mode (GCM) of Operation. D. McGrew and J. Viega. Proceedings of INDOCRYPT '04, Springer-Verlag, 2004.<sup>4</sup>

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<sup>2</sup>~~Numbers preceded by P are IEEE authorized standards projects that were not approved by the IEEE-SA Standards Board at the time this publication went to press. (The most recent draft should be used.) For information about obtaining drafts, contact the IEEE.~~

<sup>3</sup>A prior revision of this document was the normative reference for GCM in IEEE Std 802.1AE-2006, but has been superseded by NIST SP 800-38D for that purpose. It does contain additional background information, and can be downloaded from <http://csrc.nist.gov/groups/ST/toolkit/BCM/documents/proposedmodes/gcm/gcm-revised-spec.pdf>

<sup>4</sup>Available from the IACR Cryptology ePrint Archive: Report 2004/193, <http://eprint.iacr.org/2004/193>

1 **Annex Z**

2  
3 (informative) Temporary, not for publication  
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6 **Commentary**

7  
8 This is a temporary Annex, a place to record outstanding or recent technical issues and their disposition. It  
9 will be removed prior to Sponsor Ballot. Because this is not a part of the proposed standard the editor will  
10 not accept comments on the text of this Annex itself, only on the issues raised. Discussion and resolution of  
11 the issues will result in modification of the contents.  
12

13 The order of discussion of issues is intended to help the reader understand first what is the draft, secondly  
14 what may be added, and thirdly what has been considered but will not be included. In pursuit of this goal,  
15 issues where the proposed disposition is “no change” will be moved to the end. The description of issues is  
16 updated to reflect our current understanding<sup>1</sup> of the problem and its solution: where it has been considered  
17 useful to retain an original comment, in whole or part, either to ensure that its author does not feel that it has  
18 not been sufficiently argued or the editor suspects there may be further aspects to the issue, that has been  
19 done as a footnote.  
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<sup>1</sup>This annex is not intended therefore to be a complete historical record of the development of the draft. The formal record comprises  
54 the retained drafts and dispositions of comments.