

workshops to begin the assumption buster process. The assumptions that underlie this series are that cyber space is an adversarial domain, that the adversary is tenacious, clever, and capable, and that re-examining cyber security solutions in the context of these assumptions will result in key insights that will lead to the novel solutions we desperately need. To ensure that our discussion has the requisite adversarial flavor, we are inviting researchers who develop solutions of the type under discussion, and researchers who exploit these solutions. The goal is to engage in robust debate of topics generally believed to be true to determine to what extent that claim is warranted. The adversarial nature of these debates is meant to ensure the threat environment is reflected in the discussion in order to elicit innovative research concepts that will have a greater chance of having a sustained positive impact on our cyber security posture.

The first topic to be explored in this series is "Defense-in-depth is a Smart Investment." The workshop on this topic will be held in the Washington, DC area on March 22, 2011.

*Assertion:* "Defense-in-Depth is a smart investment because it provides an environment in which we can safely and securely conduct computing functions and achieve mission success."

This assertion reflects a commonly held viewpoint that Defense-in-Depth is a smart investment for achieving perfect safety/security in computing. To analyze this statement we must look at it from two perspectives. First, we need to determine how the cyber security community developed confidence in Defense-in-Depth despite mounting evidence of its limitations, and second, we must look at the mechanisms in place to evaluate the cost/benefit of implementing Defense-in-Depth that layers mechanisms of uncertain effectiveness.

Initially developed by the military for perimeter protection, Defense-in-Depth was adopted by the National Security Agency (NSA) for main-frame computer system protection. The Defense-in-Depth strategy was designed to provide multiple layers of security mechanisms focusing on people, technology, and operations (including physical security) in order to achieve robust information assurance (IA).<sup>1</sup> Today's highly networked computing environments, however, have significantly changed the cyber security calculus, and Defense-in-Depth has struggled to keep pace with

change. Over time, it became evident that Defense-in-depth failed to provide information assurance against all but the most elementary threats, in the process putting at risk mission essential functions. The 2009 White House Cyberspace Policy Review called for "changes in technology" to protect cyberspace, and the 2010 DHS DOD MOA sought to "aid in preventing, detecting, mitigating and recovering from the effects of an attack", suggesting a new dimension for Defense-in-depth along the lifecycle of an attack.

Defense-in-Depth can provide robust information assurance properties if implemented along multiple dimensions; however, we must consider whether layers of sometimes ineffective defense tools may result in *delaying* potential compromise without providing any guarantee that compromise will be completely *prevented*. In today's highly networked world, Defense-in-Depth may best be viewed as a practical way to defer harm rather than a means to security. It is worth considering whether the Defense-in-Depth strategy tends to contribute more to network *survivability* than it does to mission assurance.

Intrusions into DoD and other information systems over the past decade provide ample evidence that Defense-in-Depth provides no significant barrier to sophisticated, motivated, and determined adversaries given those adversaries can structure their attacks to pass through all the layers of defensive measures. In the meantime, kinetic Defense-in-Depth of weapons platforms (such as aircraft) evolved into a life-cycle strategy of stealth (prevent), radars (detect), jammers and chaff (mitigate), fire extinguishers (survive) and parachutes (recover), a strategy that could provide value in the cyber domain.

#### How to Apply

If you would like to participate in this workshop, please submit (1) a resume or curriculum vita of no more than two pages which highlights your expertise in this area and (2) a one-page paper stating your opinion of the assertion and outlining your key thoughts on the topic. The workshop will accommodate no more than 60 participants, so these brief documents need to make a compelling case for your participation. Applications should be submitted to [assumptionbusters@nitrd.gov](mailto:assumptionbusters@nitrd.gov) no later than 5 p.m. EST on February 10, 2011.

#### Selection and Notification

The SCORE committee will select an expert group that reflects a broad range of opinions on the assertion. Accepted

participants will be notified by e-mail no later than February 28, 2011. We cannot guarantee that we will contact individuals who are not selected, though we will attempt to do so unless the volume of responses is overwhelming.

Submitted by the National Science Foundation for the National Coordination Office (NCO) for Networking and Information Technology Research and Development (NITRD) on January 7, 2011.

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## SECURITIES AND EXCHANGE COMMISSION

### Proposed Collection; Comment Request

*Upon Written Request, Copies Available From:* Securities and Exchange Commission, Office of Investor Education and Advocacy, Washington, DC 20549-0213.

#### *Extension:*

Rule 17a-4; SEC File No. 270-198; OMB Control No. 3235-0279.

Notice is hereby given that pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*), the Securities and Exchange Commission ("Commission") is soliciting comments on the collection of information provided for in Rule 17a-4 (17 CFR 240.17a-4), under the Securities Exchange Act of 1934 (15 U.S.C. 78a *et seq.*). The Commission plans to submit this existing collection of information to the Office of Management and Budget for extension and approval.

Rule 17a-4 requires exchange members, brokers and dealers ("broker-dealers") to preserve for prescribed periods of time certain records required to be made by Rule 17a-3. In addition, Rule 17a-4 requires the preservation of records required to be made by other Commission rules and other kinds of records which firms make or receive in the ordinary course of business. These include, but are not limited to, bank statements, cancelled checks, bills receivable and payable, originals of communications, and descriptions of various transactions. Rule 17a-4 also permits broker-dealers to employ, under certain conditions, electronic storage media to maintain records required to be maintained under Rules 17a-3 and 17a-4.

<sup>1</sup> *Defense-in-depth: A practical strategy for achieving Information Assurance in today's highly networked environments.*

There are approximately 5,057 active, registered broker-dealers. The staff estimates that the average amount of time necessary to preserve the books and records as required by Rule 17a-4 is 254 hours per broker-dealer per year. Thus the staff estimates that the total compliance burden for 5,057 respondents is 1,284,478 hours.

The staff believes that compliance personnel would be charged with ensuring compliance with Commission regulation, including Rule 17a-4. The staff estimates that the hourly salary of a Compliance Clerk is \$67 per hour.<sup>1</sup> Based upon these numbers, the total cost of compliance for 5,057 respondents is the dollar cost of approximately \$86.1 million (1,284,478 yearly hours × \$67). The total burden hour decrease of 468,122 is due to a decrease in the number of respondents from 6,900 to 5,057.

Based on conversations with members of the securities industry and based on the Commission's experience in the area, the staff estimates that the average broker-dealer spends approximately \$5,000 each year to store documents required to be retained under Rule 17a-4. Costs include the cost of physical space, computer hardware and software, etc., which vary widely depending on the size of the broker-dealer and the type of storage media employed. The Commission estimates that the annual reporting and record-keeping cost burden is \$25,285,000. This cost is calculated by the number of active, registered broker-dealers multiplied by the reporting and record-keeping cost for each respondent (5,057 active, registered broker-dealers × \$5,000).

Written comments are invited on:

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology. Consideration will be given to comments and suggestions submitted in writing within 60 days of this publication.

<sup>1</sup> This figure is based on SIFMA's Office Salaries in the Securities Industry 2010, modified by Commission staff to account for an 1800-hour work-year multiplied by 2.93 to account for bonuses, firm size, employee benefits, and overhead.

Please direct your written comments to: Thomas Bayer, Chief Information Officer, Securities and Exchange Commission, c/o Remi Pavlik-Simon, 6432 General Green Way, Alexandria, Virginia 22312 or send an e-mail to: [PRA\\_Mailbox@sec.gov](mailto:PRA_Mailbox@sec.gov).

Dated: January 6, 2011.

**Elizabeth M. Murphy**,  
Secretary.

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## SECURITIES AND EXCHANGE COMMISSION

### Proposed Collection; Comment Request

*Upon Written Request, Copies Available From:* Securities and Exchange Commission, Office of Investor Education and Advocacy, Washington, DC 20549-0213.

Extension:

Rule 15c3-3; SEC File No. 270-087; OMB Control No. 3235-0078.

Notice is hereby given that pursuant to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*) the Securities and Exchange Commission ("Commission") is soliciting comments on the existing collection of information provided for in Rule 15c3-3 (17 CFR 240.15c3-3), under the Securities Exchange Act of 1934 (15 U.S.C. 78a *et seq.*). The Commission plans to submit this existing collection of information to the Office of Management and Budget for extension and approval.

Rule 15c3-3 requires that a broker-dealer that holds customer securities obtain and maintain possession and control of fully-paid and excess margin securities they hold for customers. In addition, the Rule requires that a broker-dealer that holds customer funds make either a weekly or monthly computation to determine whether certain customer funds need to be segregated in a special reserve bank account for the exclusive benefit of the firm's customers. It also requires that a broker-dealer maintain a written notification from each bank where a Special Reserve Bank Account is held acknowledging that all assets in the account are for the exclusive benefit of the broker-dealer's customers, and to provide written notification to the Commission (and its designated examining authority) under certain, specified circumstances. Finally, paragraph (o) of Rule 15c3-3, which applies only to broker-dealers that sell securities futures products ("SFP") to customers, requires that such broker-dealers provide certain notifications to

customers, and to make a record of any changes of account type.

There are approximately 279 broker-dealers fully subject to the Rule (*i.e.*, broker-dealers that cannot claim any of the exemptions enumerated at paragraph (k)), of which approximately 13 make daily, 210 make weekly, and 56 make monthly, reserve computations. On average, each of these respondents require approximately 2.5 hours to complete a computation. Accordingly, Commission staff estimates that the resulting burden totals 36,780 hours annually ((2.5 hours × 240 computations × 13 respondents that calculate daily) + (2.5 hours × 52 computations × 210 respondents that calculate weekly) + (2.5 hours × 12 computations × 56 respondents that calculate monthly)).

A broker-dealer required to maintain the Special Reserve Bank Account prescribed by Rule 15c3-3 must obtain and retain a written notification from each bank in which it has a Special Reserve Bank Account to evidence bank's acknowledgement that assets deposited in the Account are being held by the bank for the exclusive benefit of the broker-dealer's customers. As stated previously, 279 broker-dealers are presently fully-subject to Rule 15c3-3. In addition, 120 broker-dealers operate in accordance with the exemption provided in paragraph (k)(2)(i) which also requires that a broker-dealer maintain a Special Reserve Bank Account. The staff estimates that of the total broker-dealers that must comply with this rule, only 25%, or 100 ((279 + 120) × .25) must obtain 1 new letter each year (either because the broker-dealer changed the type of business it does and became subject to either paragraph (e)(3) or (k)(2)(i) or simply because the broker-dealer established a new Special Reserve Bank Account). The staff estimates that it would take a broker-dealer approximately 1 hour to obtain this written notification from a bank regarding a Special Reserve Bank Account because the language in these letters is largely standardized. Therefore, Commission staff estimates that broker-dealers will spend approximately 100 hours each year to obtain these written notifications.

In addition, a broker-dealer must immediately notify the Commission and its designated examining authority if it fails to make a required deposit to its Special Reserve Bank Account. Commission staff estimates that broker-dealers file approximately 33 such notices per year. Broker-dealers would require approximately 30 minutes, on average, to file such a notice. Therefore, Commission staff estimates that broker-dealers would spend a total of