



STARFIELD TECHNOLOGIES, LLC, A SUBSIDIARY OF  
GODADDY INC.

WEBTRUST FOR CERTIFICATION AUTHORITIES REPORT

JULY 01, 2023, TO JUNE 30, 2024

Attestation and Compliance Services



**Proprietary & Confidential**

Unauthorized use, reproduction, or distribution of this report, in whole or in part, is strictly prohibited.

# TABLE OF CONTENTS

SECTION 1 INDEPENDENT ASSURANCE REPORT .	3
SECTION 2 MANAGEMENT'S ASSERTION .....	6
APPENDIX A STARFIELD'S ROOT CAS .....	10

# **SECTION I**

## **INDEPENDENT ACCOUNTANT'S REPORT**

## REPORT OF THE INDEPENDENT ACCOUNTANT

To the Management of Starfield Technologies, LLC (“Starfield”), a subsidiary of GoDaddy, Inc. (“GoDaddy”):

### Scope

We have examined Starfield’s management assertion that for its Certification Authority (“CA”) operations at its Phoenix, Arizona, and Ashburn, Virginia, locations, for its Starfield and GoDaddy CA certificates as enumerated in Appendix A, Starfield has:

- disclosed its business, key and certificate lifecycle management, and CA environmental control practices within its [CA Certificate Policy and Certification Practice Statement \(CP/CPS\) version 5.01](#), dated April 01, 2024 (and the previous versions – [CA Certificate Policy and Certification Practice Statement \(CP/CPS\) version 4.18, dated November 11, 2022](#) and [CA Certificate Policy and Certification Practice Statement \(CP/CPS\) version 5.0, dated August 1, 2023](#))
- maintained effective controls to provide reasonable assurance that:
  - Starfield's CPS is consistent with its CP/CPS; and
  - Starfield provides its services in accordance with its CP/CPS;
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated (for the registration activities performed by Starfield); and
  - subordinate CA certificate requests are accurate, authenticated, and approved.
- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

throughout the period July 01, 2023, through June 30, 2024, based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

Starfield does not escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management, and does not provide certificate suspension. Accordingly, our assertion does not extend to controls that would address those criteria.

### Certification Authority’s Responsibilities

Starfield’s management is responsible for its assertion including the fairness of its presentation, and the provision of its described services in accordance with the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

## Practitioner’s Responsibilities

Our responsibility is to express an opinion on management’s assertion based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and in accordance with International Standard on Assurance Engagements 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management’s assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management’s assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management’s assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with the Code of Professional Conduct established by the AICPA and the International Ethics Standards Board for Accountants’ Code of Ethics for Professional Accountants.

We applied the Statements on Quality Control Standards established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

The relative effectiveness and significance of specific controls at Starfield and their effect on assessments of control risk for subscribers and relying parties are dependent on their interaction with the controls, and other factors present at individual subscriber and relying party locations. Our examination did not extend to controls at individual subscriber and relying party locations and we have not evaluated the effectiveness of such controls.

## Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. For example, because of their nature, controls may not prevent, or detect unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection to the future of any conclusions based on our findings is subject to the risk that controls may become ineffective.

## Opinion

In our opinion, Starfield’s management assertion, as referred to above, is fairly stated, in all material respects, in accordance with the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

This report does not include any representation as to the quality of Starfield’s services other than its Certification Authority operations at its Phoenix, Arizona, and Ashburn, Virginia, locations, for its Starfield and GoDaddy CA certificates, nor the suitability of any of Starfield’s services for any customer’s intended purpose.

## Other Matters

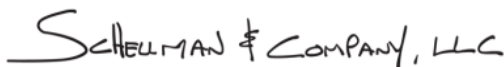
Without modifying our opinion, we noted the following other matters during our examination:

Matter Topic		Matter Description
1	CPR not responded to within 24 hours	Bug 1902868: GoDaddy/Starfield were emailed at 20:48 UTC advising of multiple mis-issued certificates due to low entropy in the serial number. Email was sent to practices@starfieldtech.com as per both CCADB records and their own CPS. No reply had been received within 24 hours. There were no additional issues, this issue was opened to cover the lack of response within 24 hours.

Matter Topic		Matter Description
2	CAA checks did not properly handle issuewild tag allowing FQDN SANs to be added to wildcard certs	Bug 1904748: GoDaddy received a certificate problem report alerting them to potential concerns with CAA checking. As a result of the certificate problem report investigation, GoDaddy identified a software bug in the CAA validation process which allowed certificates with godaddy.com or starfieldtech.com in the 'issuewild' tag and NOT in the 'issue' tag to include the FQDN of that domain name as a SAN on a wildcard certificate. This is a violation of the Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates, section 3.2.2.8, which states a "CA MUST retrieve and process CAA records in accordance with RFC 8659 for each dNSName in the subjectAltName extension." Specifically, RFC 8659, section 4.3., which states that "Each issuewild Property MUST be ignored when processing a request for an FQDN that is not a Wildcard Domain Name."
3	CAA checks passed when records contained incorrect variants of godaddy.com or starfieldtech.com	Bug 1904749: On 6/23/2024, GoDaddy received a certificate problem report alerting them to potential concerns with CAA checking. As a result of the certificate problem report investigation, GoDaddy identified a software bug in the CAA process which allowed CAA validation to pass when CAA record values contained variants of the terms 'godaddy.com' or 'starfieldtech.com' rather than the matching the exact term which does not conform to the syntax of 'issuer-domain-name' as defined in RFC 8659, section 4.2. Non-conformance with RFC 8659 is a violation of the Baseline Requirements for the Issuance and Management of Publicly -Trusted TLS Server Certificates, section 3.2.2.8, which states "CA MUST retrieve and process CAA records in accordance with RFC 8659 for each dNSName in the subjectAltName extension."
4	Intermittent unauthorized OCSP response when certificate is freshly issued	Bug 1905419: Through <a href="https://sslmate.com/labs/ocsp_watch/">https://sslmate.com/labs/ocsp_watch/</a> a user noticed that for some period of time, OCSP status was unavailable for freshly minted certificates on GoDaddy. The user reached out to GoDaddy through a CPR process with specific certs that have had issues, and the OCSP watch link but had not received an answer indicating that they were doing a deeper look of why OCSP watch keeps flagging GoDaddy intermittently.  The certificate was returning "ocsp.ParseResponseForCert => ocsp: error from server: unauthorized" at the time of opening this bug.

**Use of the WebTrust Seal**

Starfield’s use of the WebTrust for Certification Authorities Seal constitutes a symbolic representation of the contents of this report, and it is not intended, nor should it be construed, to update this report or provide any additional assurance.



Schellman & Company, LLC  
 Tampa, Florida, United States  
 September 5, 2024

# **SECTION 2**

## **MANAGEMENT'S ASSERTION**

## MANAGEMENT'S ASSERTION

Starfield Technologies, LLC ("Starfield") operates the Certification Authority ("CA") services for its Starfield and GoDaddy CA certificates as enumerated in Appendix A, and provides the following CA services:

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA and cross-certification

The management of Starfield is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosures on its website, management controls, subscriber key lifecycle management controls, certificate lifecycle management controls, and subordinate CA certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

There are inherent limitations in any controls, including the possibility of human error, and the circumvention or overriding of controls. Accordingly, even effective controls can only provide reasonable assurance with respect to Starfield's CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Starfield management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in Starfield's management's opinion, in providing its CA services at its Phoenix, Arizona, and Ashburn, Virginia, locations, Starfield has:

- disclosed its business, key and certificate lifecycle management, and CA environmental control practices within its [CA Certificate Policy and Certification Practice Statement \(CP/CPS\) version 5.01](#), dated April 01, 2024 (and the previous versions – [CA Certificate Policy and Certification Practice Statement \(CP/CPS\) version 4.18, dated November 11, 2022](#) and [CA Certificate Policy and Certification Practice Statement \(CP/CPS\) version 5.0, dated August 1, 2023](#))
- maintained effective controls to provide reasonable assurance that:
  - Starfield's CPS is consistent with its CP/CPS; and
  - Starfield provides its services in accordance with its CP/CPS;
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated (for the registration activities performed by Starfield); and
  - subordinate CA certificate requests are accurate, authenticated, and approved.



- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

throughout the period July 01, 2023, through June 30, 2024, based on [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#) including the following:

#### **CA Business Practices Disclosure**

- Certificate Practice Statement (CPS)
- Certificate Policy (CP)

#### **CA Business Practices Management**

- Certificate Policy Management
- Certification Practice Statement Management

#### **CA Environmental Controls**

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- Systems Development, Maintenance, and Change Management
- Disaster Recovery, Backups, and Business Continuity Management
- Monitoring and Compliance
- Audit Logging

#### **CA Key Lifecycle Management Controls**

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival and Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management
- CA Key Transportation
- CA Key Migration

#### **Subscriber Key Lifecycle Management Controls**

- Requirements for Subscriber Key Management

**Certificate Lifecycle Management Controls**

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

**Subordinate CA Certificate Lifecycle Management Controls**

- Subordinate CA Certificate Lifecycle Management

Starfield does not escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management, and does not provide certificate suspension. Accordingly, our assertion does not extend to controls that would address those criteria.

GoDaddy has disclosed the following matters publicly on Mozilla’s Bugzilla platform. These matters were included below due to being open during the period July 01, 2023, to June 30, 2024.

Bug ID	Summary	Opened	Closed	Resolution
1902868	GoDaddy: CPR was not responded to in 24 hours	06/15/2024	08/21/2024	Closed
1904748	CAA checks did not properly handle issuewild tag allowing FQDN SANs to be added to wildcard certs	06/25/2024	Open	Open
1904749	CAA checks passed when records contained incorrect variants of godaddy.com or starfieldtech.com	06/25/2024	Open	Open
1905419	Intermittent unauthorized OCSP response when certificate is freshly issued	06/28/2024	Open	Open

Signed by:

*Sarath Geethakumar*  
58AC015BF62B4FE...

Sarath Geethakumar  
Chief Information Security Officer  
Starfield Technologies, LLC  
September 5, 2024

# APPENDIX A

## STARFIELD'S CAs

## STARFIELD'S ROOT CAs

Root CA	Subject Common Name	SHA256 Fingerprint
OU = Go Daddy Class 2 Certification Authority O = The Go Daddy Group, Inc C = US	Not applicable.	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4
CN = Go Daddy Root Certificate Authority – G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	Go Daddy Root Certificate Authority – G2	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA
OU = Starfield Class 2 Certification Authority O = Starfield Technologies, Inc. C = US	Not applicable.	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658
CN = Starfield Root Certificate Authority – G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Root Certificate Authority – G2	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5
CN = Starfield Services Root Certificate OU = <a href="http://certificates.starfieldtech.com/repository/">http://certificates.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Services Root Certificate	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E

Root CA	Subject Common Name	SHA256 Fingerprint
CN = Starfield Root Certificate Authority – G5 O = Starfield Technologies, Inc. C = US	Starfield Root Certificate Authority – G5	414F6C10FA816561832751BDB241ED8AE2BB0E2EBE651DE48E317AB B774E38F0
CN = Starfield Root Certificate Authority – G6 O = Starfield Technologies, Inc. C = US	Starfield Root Certificate Authority – G6	FDB2C428AC393FD61B386497E0CC6652D71F35F6683C8E0AD0E754 CF8F133D2A
CN = GoDaddy Root Certificate Authority – G5 O = Starfield Technologies, Inc. C = US	GoDaddy Root Certificate Authority – G5	E0562C0CD4CD5959DB2AB9D8E7426B248FD75534F5D50CFAF8CB31 2239F93086
CN = GoDaddy Root Certificate Authority – G6 O = Starfield Technologies, Inc. C = US	GoDaddy Root Certificate Authority – G6	DB3C05E9C55D5259B057474D7F7F3E54A2A51AFAA71EC5C41D8C3C BE68108799

### STARFIELD'S CROSS-SIGNED CAs

Root CA	Subject Common Name	SHA256 Fingerprint
CN = Go Daddy Root Certificate Authority – G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	Go Daddy Root Certificate Authority – G2	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74 D7A7E6ECB

Root CA	Subject Common Name	SHA256 Fingerprint
CN = Go Daddy Root Certificate Authority – G2 OU = <a href="https://certs/godaddy.com/repository/">https://certs/godaddy.com/repository/</a> O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	Go Daddy Root Certificate Authority – G2	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB
CN = Starfield Root Certificate Authority – G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Root Certificate Authority – G2	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BD E5FCAB4BC
CN = Starfield Root Certificate Authority – G2 OU = <a href="https://certs.starfieldtech.com/repository/">https://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Root Certificate Authority – G2	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C
CN = Starfield Services Root Certificate Authority – G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Services Root Certificate Authority – G2	EB159C922A3FC2191475CA20A53816D87A38A1A79A7264789193D2F1F750E85E

Root CA	Subject Common Name	SHA256 Fingerprint
CN = Starfield Services Root Certificate Authority – G2 OU = https://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Services Root Certificate Authority – G2	A24B9440F9FCBEBB48C274C03DE7D24C5ED1CA59D2D362F29ED3B457762C75BB
CN = Starfield Services Root Certificate Authority – G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Services Root Certificate Authority – G2	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA
CN = Starfield Services Root Certificate Authority – G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Services Root Certificate Authority – G2	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996
CN=GoDaddy Secure Certificate Authority - G5; O=GoDaddy Inc.; C=US	GoDaddy Secure Certificate Authority – G5	880FBC44FE71AA1BE40DB130917B1BAEC1BD889B2B3D7478EDA04728667E8B44
CN=Starfield Secure Certificate Authority - G5; O=Starfield Technologies, Inc.; C=US	Starfield Secure Certificate Authority - G5	29E502995310403685DD6258F9D04856878963042D4749C6D5D9773A310C31C0

## STARFIELD'S INTERMEDIATE CAs

Intermediate CA	Subject Common Name	SHA256 Fingerprint
serialNumber = 07969287 CN = Go Daddy Secure Certificate Authority OU = <a href="http://certificates.godaddy.com/repository">http://certificates.godaddy.com/repository</a> O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	Go Daddy Secure Certificate Authority	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3
CN = Go Daddy Secure Certificate Authority – G2 OU = <a href="http://certs.godaddy.com/repository">http://certs.godaddy.com/repository</a> O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	Go Daddy Secure Certificate Authority – G2	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6
CN = Go Daddy Secure Code Signing Certificate Authority – G2 OU = <a href="http://certs.godaddy.com/repository">http://certs.godaddy.com/repository</a> O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	Go Daddy Secure Code Signing Certificate Authority – G2	EF356CC299AA637916C81A48891B5BA2F333A2064D93A89BA14F63A14AA6B251



Intermediate CA	Subject Common Name	SHA256 Fingerprint
CN = Go Daddy Secure Extended Validation Code Signing CA – G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	Go Daddy Secure Extended Validation Code Signing CA – G2	9EFC910271094B886BD9A8FC9E394DBF2AE514778CB373544085AF815CABFE2D
serialNumber = 10688435 CN = Starfield Secure Certification Authority OU = <a href="http://certificates.starfieldtech.com/repository">http://certificates.starfieldtech.com/repository</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Secure Certification Authority	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030
CN = Starfield Secure Certificate Authority – G2 OU = <a href="http://certs.starfieldtech.com/repository/">http://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	Starfield Secure Certificate Authority – G2	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72
CN = Starfield Secure Code Signing Certificate Authority – G2 OU = <a href="http://certs.starfieldtech.com/repository/">http://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	Starfield Secure Code Signing Certificate Authority – G2	26CFA206753E96AED7C30F5674E7C6F5A0CB2F93837AF6A1596C2F799C725385

Intermediate CA	Subject Common Name	SHA256 Fingerprint
CN = Starfield Secure Extended Validation Code Signing CA – G2 O = Starfield Technologies, LLC L = Scottsdale S = Arizona C = US	Starfield Secure Extended Validation Code Signing CA – G2	F41A694B3825942DB89523E9775F997DB9FA2998398DC39A74B72670DACFD468
CN=GoDaddy Secure Certificate Authority - G5; O=GoDaddy Inc.; C=US	GoDaddy Secure Certificate Authority - G5	E7F61F147D8C9A38F20D27C5C0EBD5CD0845F905C15C52C8634160AA9F802951
CN=Starfield Secure Certificate Authority - G5; O=Starfield Technologies, Inc.; C=US	Starfield Secure Certificate Authority - G5	0090762B916EBD8CD3A771A4C199391823F75C41F91F8D5E2C3C9D27D6EA441A