

**NIST Internal Report
NIST IR 8425A ipd**

Recommended Cybersecurity Requirements for Consumer-Grade Router Products

Initial Public Draft

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<https://doi.org/10.6028/NIST.IR.8425A.ipd>

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April 2024



U.S. Department of Commerce
Gina M. Raimondo, Secretary

National Institute of Standards and Technology
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311 References

- 312 [WHAnnouncement] White House (2023) Biden-Harris Administration Announces Cybersecurity
313 Labeling Program for Smart Devices to Protect American Consumers. (White House,
314 Washington, DC). [https://www.whitehouse.gov/briefing-room/statements-
315 releases/2023/07/18/biden-harris-administration-announces-cybersecurity-labeling-
316 program-for-smart-devices-to-protect-american-consumers/](https://www.whitehouse.gov/briefing-room/statements-releases/2023/07/18/biden-harris-administration-announces-cybersecurity-labeling-program-for-smart-devices-to-protect-american-consumers/)
- 317 [IR8425] Fagan M, Megas KN, Watrobski P, Marron J, Cuthill B (2022) Profile of the IoT Core
318 Baseline for Consumer IoT Products. (National Institute of Standards and Technology,
319 Gaithersburg, MD), NIST Interagency or Internal Report (IR) NIST IR 8425.
320 <https://doi.org/10.6028/NIST.IR.8425>
- 321 [BBF] Walls, J, Editor (2022) Functional Requirements for Broadband Residential Gateway
322 Devices. (Broadband Forum, Fremont, CA), Technical Report (TR) 124, Issue 8.
323 [https://www.broadband-forum.org/resources/tr-124-issue-8-functional-requirements-for-
324 broadband-residential-gateway-devices](https://www.broadband-forum.org/resources/tr-124-issue-8-functional-requirements-for-broadband-residential-gateway-devices)
- 325 [CableLabs] CableLabs Security (2021) Gateway Device Security Best Common Practices.
326 (CableLabs, Louisville, CO), CL-GL-GDS-BCP-V01-211007.
327 [https://community.cablelabs.com/wiki/plugins/servlet/cablelabs/alfresco/download?id=1
328 209eea3-bd81-40cb-9a18-21bd6cfcd80d](https://community.cablelabs.com/wiki/plugins/servlet/cablelabs/alfresco/download?id=1209eea3-bd81-40cb-9a18-21bd6cfcd80d)
- 329 [BSI] Federal Office for Information Security (2023) Secure Broadband Router: Requirements for
330 Secure Broadband Routers. (Federal Office for Information Security, Bonn, Germany), BSI
331 Technical Report (TR) 03148. [https://www.bsi.bund.de/EN/Themen/Unternehmen-und-
332 Organisationen/Standards-und-Zertifizierung/Technische-Richtlinien/TR-nach-Thema-
333 sortiert/tr03148/tr-03148.html](https://www.bsi.bund.de/EN/Themen/Unternehmen-und-Organisationen/Standards-und-Zertifizierung/Technische-Richtlinien/TR-nach-Thema-sortiert/tr03148/tr-03148.html)
- 334 [IMDA] Info-communications Media Development Authority of Singapore (2020) Security
335 Requirements for Residential Gateways. (Info-communications Media Development
336 Authority, Singapore), IMDA Technical Specification (TS) RG-SEC.
337 [https://www.imda.gov.sg/-/media/imda/files/regulation-licensing-and-consultations/ict-
338 standards/telecommunication-standards/radio-comms/imda-ts-rg-sec.pdf](https://www.imda.gov.sg/-/media/imda/files/regulation-licensing-and-consultations/ict-standards/telecommunication-standards/radio-comms/imda-ts-rg-sec.pdf)
- 339 [SP800-193] Regenscheid, AR (2018) Platform Firmware Resiliency Guidelines. (National
340 Institute of Standards and Technology, Gaithersburg, MD), NIST Special Publication (SP)
341 800-193. <https://doi.org/10.6028/NIST.SP.800-193>
- 342 [SP800-161r1] Boyens JM, Smith AM, Bartol N, Winkler K, Holbrook A, Fallon M (2022)
343 Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations.
344 (National Institute of Standards and Technology, Gaithersburg, MD), NIST Special
345 Publication (SP) 800-161r1. <https://doi.org/10.6028/NIST.SP.800-161r1>
- 346 [SSDF] Souppaya MP, Scarfone KA, Dodson DF (2022) Secure Software Development Framework
347 (SSDF) Version 1.1: Recommendations for Mitigating the Risk of Software Vulnerabilities.
348 (National Institute of Standards and Technology, Gaithersburg, MD), NIST Special
349 Publication (SP) 800-218. <https://doi.org/10.6028/NIST.SP.800-218>
- 350 [ISO29147] International Organization for Standardization (2018) Information technology —
351 Security techniques — Vulnerability disclosure. (ISO Standard No. 29147:2018).
352 <https://www.iso.org/standard/72311.html>

- 353 [ISO30111] International Organization for Standardization (2019) Information technology —
354 Security techniques — Vulnerability handling processes. (ISO Standard No. 30111:2019).
355 <https://www.iso.org/standard/69725.html>
- 356 [ISO31000] International Organization for Standardization (2018) Risk management —
357 Guidelines. (ISO Standard No. 31000:2018). <https://www.iso.org/standard/65694.html>
- 358 [ISO26514] International Organization for Standardization (2022) Systems and software
359 engineering — Design and development of information for users. (ISO Standard No.
360 26514:2022). <https://www.iso.org/standard/77451.html>
- 361 [CSWP33] Fagan M, Megas KN, Watrobski P, Marron J, Cuthill B, Lemire D, Hoehn B (2024).
362 Product Development Cybersecurity Handbook: Concepts and Considerations for IoT
363 Product Manufacturers. (National Institute of Standards and Technology, Gaithersburg,
364 MD), Draft NIST Cybersecurity White Paper (CSWP) 33.
365 <https://doi.org/10.6028/NIST.CSWP.33.ipd>
- 366 [SecureByDesign] Cybersecurity and Infrastructure Security Agency (2023). Secure-by-Design
367 Shifting the Balance of Cybersecurity Risk: Principles and Approaches for Secure by Design
368 Software. (Cybersecurity and Infrastructure Security, Washington, DC).
369 https://www.cisa.gov/sites/default/files/2023-10/SecureByDesign_1025_508c.pdf
- 370 [MUD] Lear E, Droms R, Romascano D (2019) Manufacturer Usage Description Specification.
371 (Internet Engineering Taskforce), IETF Request for Comments (RFC) 8520.
372 <https://datatracker.ietf.org/doc/html/rfc8520>
- 373 [SP800-40r4] Souppaya MP, Scarfone KA (2022) Guide to Enterprise Patch Management
374 Planning: Preventive Maintenance for Technology. (National Institute of Standards and
375 Technology, Gaithersburg, MD), NIST Special Publication (SP) 800-40, Rev. 4.
376 <https://doi.org/10.6028/NIST.SP.800-40r4>
- 377 [RFC6092] Woodyatt, J, Editor (2011) Recommended Simple Security Capabilities in
378 Customer Premises Equipment (CPE) for Providing Residential IPv6 Internet Service.
379 (Internet Engineering Task Force), IETF Request for Comment (RFC) 6092.
380 <https://datatracker.ietf.org/doc/html/rfc6092>
- 381 [IR8320] Bartock MJ, Souppaya MP, Savino R, Knoll T, Shetty U, Cherfaoui M, Yeluri R, Malhotra
382 A, Banks D, Jordan M, Pendarakis D, Rao JR, Romness P, Scarfone KA (2022) Hardware-
383 Enabled Security: Enabling a Layered Approach to Platform Security for Cloud and Edge
384 Computing Use Cases. (National Institute of Standards and Technology, Gaithersburg, MD),
385 NIST Interagency or Internal Report (IR) 8320. <https://doi.org/10.6028/NIST.IR.8320>
- 386 [SP800-37r2] Joint Task Force (2018) Risk Management Framework for Information Systems
387 and Organizations: A System Life Cycle Approach for Security and Privacy. (National
388 Institute of Standards and Technology, Gaithersburg, MD), NIST Special Publication (SP)
389 800-37, Rev. 2. <https://doi.org/10.6028/NIST.SP.800-37r2>
- 390 [RFC6092] Woodyatt J, Ed. (2011) Recommended Simple Security Capabilities in Customer
391 Premises Equipment (CPE) for Providing Residential IPv6 Internet Service. (Internet
392 Engineering Taskforce), IETF Request for Comments (RFC) 6029.
393 <https://datatracker.ietf.org/doc/rfc6092/>
- 394 [ParksRouterResearch] Parks Associates (2022) Parks Associates: 52% of Consumers Acquired
395 Their Routers From Their ISP. (PRNewswire, Dallas, TX).

396 [https://www.prnewswire.com/news-releases/parks-associates-52-of-consumers-acquired-](https://www.prnewswire.com/news-releases/parks-associates-52-of-consumers-acquired-their-routers-from-their-isp-301593338.html)
397 [their-routers-from-their-isp-301593338.html](https://www.prnewswire.com/news-releases/parks-associates-52-of-consumers-acquired-their-routers-from-their-isp-301593338.html)

398 **Appendix A. Crosswalk between Technical Outcomes and Consumer-Grade Router**
399 **Cybersecurity and Firmware Requirements**

400 This Appendix provides additional information about how the requirements from the four
401 router standards relate to the consumer-grade router profile outcomes.

402 Sections A.1 to A.7 below show which requirements from the four consumer-grade router
403 standards are related to the technical outcomes for consumer-grade routers. Each subsection
404 from A.1 to A.7 states the high-level outcome along with each sub-outcome that defines the
405 high-level outcome. The language for the consumer-grade router profile cybersecurity
406 outcomes was developed by modifying the outcomes from NISTIR 8425. Two new sub-
407 outcomes were also added based on review of the consumer-grade router standards, noted
408 with a †.

409 For each sub-outcome, a set of related requirements from the four consumer-grade router
410 standards is also included. The abbreviations used for the standards are:

411 **BBF's TR-124 Issue 8** [[BBF](#)]

412 **CL's Security Gateway Device Security Best Common Practices** [[CableLabs](#)]

413 **BSI's Secure Broadband Routers** [[BSI](#)]

414 **IMDA's Security Requirements for Residential Gateways** [[IMDA](#)]

415 In the development of firmware for consumer-grade routers and their components, NIST
416 recommends the use of Special Publication 800-193 [[SP800-193](#)]. Section 4 of that document
417 details technical cybersecurity capabilities to help mitigate firmware vulnerabilities. These
418 capabilities are supportive of the outcomes for consumer-grade router products defined in this
419 document. Thus, in addition to the four consumer-grade router standards, requirements from
420 Section 4 of SP 800-193 are also included in the following sub-sections when applicable.

421 Finally, for some outcomes and sub-outcomes, commentary is also included indicating example
422 cybersecurity enhancements of consumer-grade router products that may go beyond what is
423 reflected in the current standards or may not be applicable to all consumer-grade router
424 products, but should be considered by consumer-grade router product manufacturers.

425 **A.1. Asset Identification**

426 The consumer-grade router product is uniquely identifiable and inventories all of the consumer-
427 grade router product's components.

428 **A.1.1. Asset Identification 1**

429 The consumer-grade router product can be uniquely identified by the customer and other
430 authorized entities via means including but not limited to: host name, service set identifier
431 (SSID), and serial number.

432 *Related Standards Requirements:*

433 **BBF** GEN.DESIGN.12, GEN.DESIGN.13, MGMT.LOCAL.20, IF.LAN.WIRELESS.AP.20

434 **CL** OOB-011, KEY-006, OOB-007

435 **BSI** (3.1.2.1)

436 **IMDA** *None*

437 **A.1.2. Asset Identification 2**

438 The consumer-grade router product uniquely identifies each product component (e.g., router
439 device, mobile app) and maintains an up-to-date inventory of connected product components.

440 *No requirements from the consumer-grade router standards were mapped to this outcome.*
441 *Consumer-grade router products composed of only a consumer-grade router device would*
442 *natively meet this outcome. When a consumer-grade router product is composed of other*
443 *components (e.g., mobile application, backend), those components may need to support this*
444 *outcome.*

445 The asset identification outcome is focused on the ability to identify the consumer-grade
446 router and the router's management of its product components, but routers may also
447 assist customers in managing their connected devices. Machine-readable asset identifiers
448 for all connected products could enable routers to use these identifiers for the purpose of
449 asset management in support of customers' cybersecurity.

450 **A.2. Product Configuration**

451 The configuration of the consumer-grade router product is changeable, there is the ability to
452 restore a secure default setting, and any and all changes can only be performed by authorized
453 individuals, services, and other consumer-grade router product components.

454 Configuration control of networking equipment, including consumer-grade router
455 products is critical to network cybersecurity. If possible, configuration may be better
456 managed by another consumer-grade router product component (e.g., mobile
457 application) to minimize interfaces (and thus attack surface) of the consumer-grade
458 router device specifically.

459 **A.2.3. Product Configuration 1**

460 Utilizing strong authentication mechanisms (e.g., multi-factor authentication), authenticated
461 and authorized individuals (e.g., customer, ISP), services, and other consumer-grade router
462 product components can access the consumer-grade router product's configuration interfaces
463 (e.g., administration page) and change the configuration settings of the consumer-grade router
464 product via one or more consumer-grade router product components.

465 *Related Standards Requirements:*

466 **BBF** MGMT.LOCAL.2

526 **A.4. Interface Access Control 1**

527 Each consumer-grade router product component controls access to and from all interfaces³ in
528 order to limit access to only authorized entities.

529 **A.4.9. Interface Access Control 1a**

530 Use and have access only to interfaces necessary for the consumer-grade router product's
531 operation. All other channels and access to channels are removed or secured. For example,
532 disable by default remote access to the router, especially via the WAN interface.

533 *Related Standards Requirements:*

534 **BBF** MGMT.LOCAL.1, MGMT.REMOTE.WEB.1, MGMT.REMOTE.WEB.5,
535 MGMT.REMOTE.WEB.12, MGMT.REMOTE.WEB.13, SEC.GEN.5, SEC.GEN.6, SEC.GEN.10,
536 SEC.GEN.11, SEC.USERINTERFACE.8

537 **CL** HR-001, HR-002, OOB-005, MI-003, NETS-004, NETS-005, MI-011

538 **BSI** (3), (3.1), (3.1.2), (3.2), (4.1.1)

539 **IMDA** 4.2, 4.2.1

540 **SP 800-193** 4.2.1.2

541 Interfaces should be minimized for the consumer-grade router product overall, but
542 particularly attention should be given to minimizing the interfaces included on the
543 consumer-grade router devices. Extraneous interfaces unnecessary to the core features
544 of the router device should be implemented via other consumer-grade router products,
545 be turned off by default, or be removed entirely.

546 **A.4.10. Interface Access Control 1b**

547 For all interfaces necessary for the consumer-grade router product's use, access control
548 measures are in place.⁴ At a minimum this includes:

- 549 1. Assigning consumer-grade router products unique initial passwords that are required to
550 be changed to a strong password or passphrase upon installation. Support for
551 multifactor authentication is recommended.
- 552 2. Placing a timeout limit on account sessions.
- 553 3. Protecting against authentication brute force attacks (e.g., limiting failed log-in
554 attempts).
- 555 4. Making physical developer interface ports inaccessible from the outside of a
556 component.

³ Interfaces are a boundary between the IoT device and entities where interactions take place. This includes digital or network interfaces, as well as local interfaces, such as graphical user interfaces.

⁴ IETF RFC6092 Recommended Simple Security Capabilities in Customer Premises Equipment (CPE) for Providing Residential IPv6 Internet Service [[RFC6092](#)] is a relevant source for more specific guidance related to IPv6 interface cybersecurity.

- 557 5. Ensuring closed ports are not revealed during scans.
558 6. Prohibiting the reply to requests over a port for an API or Protocol that doesn't use that
559 port.

560 *Related Standards Requirements⁵:*

561 **BBF** GEN.DESIGN.14, GEN.OPS.21, MGMT.LOCAL.1, MGMT.LOCAL.5, MGMT.LOCAL.11,
562 MGMT.REMOTE.WEB.2, MGMT.REMOTE.WEB.9, IF.LAN.WIRELESS.AP.20, SEC.GEN.1,
563 SEC.GEN.8, SEC.USERINTERFACE.2, SEC.USERINTERFACE.3, SEC.USERINTERFACE.4,
564 SEC.USERINTERFACE.5, SEC.USERINTERFACE.6, SEC.USERINTERFACE.7,
565 SEC.USERINTERFACE.9

566 **CL** OOB-001, OOB-004, OOB-006, OOB-008, OOB-010, OOB-012, MI-004, MI-007, MI-
567 008, MI-009, MI-010, MI-013, DIAG-002, NETS-007, NETS-008, NETA-001, NETA-002,
568 NETA-003, MI-002

569 **BSI** (3.1), (3.1.2.1), (3.2), (4.1.1), (4.4)

570 **IMDA** 4.1.1, 4.1.2, 4.2, 4.2.1

571 **SP 800-193** 4.1.1(5), 4.2.4(3-4)

572 Control of access to the consumer-grade router's network is critical to the cybersecurity it
573 provides to customers. Generally, on-boarding to the consumer-grade router's network
574 uses a single factor, password-based authentication method (e.g., WPA key). This on-
575 boarding process can incorporate explicit network owner approval or some other
576 additional factor to reduce unauthorized access to the network.

577 **A.4.11. Interface Access Control 1c**

578 For all interfaces, access and modification privileges are limited. For example, access to the
579 administration page and changes to the configuration should be limited to authenticated users
580 authorized to make such changes.

581 *Related Standards Requirements:*

582 **BBF** MGMT.REMOTE.WEB.3, MGMT.REMOTE.WEB.4, SEC.GEN.7

583 **CL** MI-006

584 **BSI** (3.1), (3.1.2), (3.2)

585 **IMDA** 4.2

586 **SP 800-193** 4.2.3(3), 4.2.4(1)

⁵ IMDA 4.1.2 discusses password requirements, as does BSI (4.1.1). IMDA's requirement is more stringent than BSIs (i.e., minimum password character length of 10 versus 8) and is recommended by the BSI requirement.

587 **A.5. Interface Access Control 2**

588 Some, but not necessarily all, consumer-grade router product components have the means to
589 protect and maintain interface access control.

590 **A.5.12. Interface Access Control 2a**

591 Validate data received by the consumer-grade router product and validate that data shared
592 among consumer-grade router product components match specified definitions of format and
593 content.

594 *Related Standards Requirements:*

595 **BBF** *None*

596 **CL** MI-012, NETS-006

597 **BSI** *None*

598 **IMDA** 4.6

599 **SP 800-193** 4.1.1(6, 8), 4.2.4(2)

600 **A.5.13. Interface Access Control 2b**

601 Prevent unauthorized transmissions or access to other product components.

602 *Related Standards Requirements:*

603 **BBF** WAN.DoS.1, WAN.DoS.2, WAN.DoS.3, WAN.DoS.4, WAN.DoS.5

604 **CL** MI-005, NETS-006

605 **BSI** (3.1.2), (4.3), (4.7), (4.9)

606 **IMDA** 4.2.1

607 **A.5.14. Interface Access Control 2c**

608 Maintain appropriate access control during initial connection (i.e., onboarding) and when
609 reestablishing connectivity after disconnection or outage.

610 *Related Standards Requirements:*

611 **BBF** *None*

612 **CL** *None*

613 **BSI** (3.1.2.3), (3.2)

614 **IMDA** 4.1.1, 4.2, 4.2.1

615 **A.6. Software Update**

616 The software (including firmware) of all consumer-grade router product components can be
617 updated by authenticated and authorized individuals, services, and other consumer-grade
618 router product components only by using a secure and configurable mechanism, as appropriate
619 for each consumer-grade router product component.

620 **A.6.15. Software Update 1**

621 Each consumer-grade router product component can receive, verify, and apply verified
622 software updates that are signed and firmware updates that are signed and encrypted.

623 *Related Standards Requirements:*

624 **BBF** GEN.OPS.22, GEN.OPS.23

625 **CL** KEY-004, KEY-005, SB-001, SU-001, SU-005, SBOM-009, SB-002, SU-003

626 **BSI** (4.2)

627 **IMDA** 4.3

628 **SP 800-193** 4.1.1(4), 4.1.2(1-4), 4.2.1.1, 4.2.1.2(1), 4.2.4(3, 5), 4.3.1(2), 4.4.1(2-6)

629 All software update packages should be signed by the source of the update (e.g.,
630 manufacturer), but when applicable (e.g., when routers are leased from ISPs) other
631 entities may also cryptographically sign updates, adding another layer of security.

632 **A.6.16. Software Update 2**

633 The consumer-grade router product implements measures to keep software (including
634 firmware) on consumer-grade router product components up to date (i.e., automatic
635 application of updates or consistent customer notification of available updates via consumer-
636 grade router components), including provisions to prevent firmware rollback attacks (e.g., not
637 allowing the rollback of firmware to a version with known vulnerabilities).

638 *Related Standards Requirements:*

639 **BBF** GEN.OPS.19, GEN.OPS.20, MGMT.LOCAL.15, MGMT.LOCAL.21, MGMT.LOCAL.22

640 **CL** SB-003, SU-002, SU-006, SBOM-003, SBOM-007, SBOM-008, SBOM-010

641 **BSI** (4.1.2), (4.2)

642 **IMDA** 4.3

643 **SP 800-193** 4.1.2(5), 4.2.1.3, 4.4.1(1, 10, 11, 13)

644 **A.6.17. Software Update 3[†]**

645 Integrity of data, including configuration, is preserved when an update is applied. In the case of
646 a failed update, the product should revert to a usable state.

647 *Related Standards Requirements:*

648 **BBF** GEN.OPS.15, GEN.OPS.24

649 **CL** SU-004

650 **BSI** None

651 **IMDA** None

652 **SP 800-193** 4.3.1(3)

653 **A.7. Cybersecurity State Awareness**

654 The consumer-grade router product supports detection of cybersecurity incidents affecting or
655 affected by consumer-grade router product components and the data they store and transmit.

656 **A.7.18. Cybersecurity State Awareness 1**

657 The consumer-grade router product securely captures and records information about the state
658 of consumer-grade router components that can be used to detect cybersecurity incidents
659 affecting or affected by consumer-grade router product components and the data they store
660 and transmit. Information that the consumer-grade router product shall provide includes login
661 attempts, administrative events, system status, firewall status, status of all consumer-grade
662 router product components, other connected products, and timing synchronization.

663 *Related Standards Requirements:*

664 **BBF** GEN.OPS.18, LAN.FW.2, LAN.FW.3, LAN.FW.4, MGMT.LOCAL.18, MGMT.LOCAL.20

665 **CL** SB-004, LOG-001, LOG-002, LOG-003, LOG-004, LOG-005, SB-002, TS-001

666 **BSI** (4.1.2), (4.8)

667 **IMDA** None

668 **SP 800-193** 4.1.1(4), 4.1.3, 4.3.1(1, 5), 4.3.2(1-2, 4), 4.4.1(8), 4.4.2(3)

669 **A.7.19. Cybersecurity State Awareness 2[†]**

670 The consumer-grade router product informs authorized entities about or responds directly to
671 changes in cybersecurity information.

672 *Related Standards Requirements:*

673 **BBF** GEN.OPS.6

674 **CL** AR-002

675 **BSI** None

676 **IMDA** None

677 **SP 800-193** 4.1.3(3), 4.3.1(2-4, 6), 4.3.2(3, 5-6), 4.4.1(9, 11), 4.4.2(9)

678 **Appendix B. Non-Technical Outcome Considerations**

679 **Table 1** below states the non-technical cybersecurity outcomes NIST has defined for the
 680 consumer-grade router profile with the requirements from the four consumer-grade router
 681 standards that related to these outcomes.

682 **Table 1. Non-technical cybersecurity outcomes and requirements from consumer-grade router standards**

Consumer-Grade Router Profile Non-Technical Outcome	Related Requirements
Documentation <i>The consumer-grade router product developer creates, gathers, and stores information relevant to cybersecurity of the consumer-grade router product and its product components prior to customer purchase, and throughout the development of a product and its subsequent lifecycle.</i>	CL HR-005, MI-014, DIAG-001, SBOM-004, SBOM-005
Information and Query Reception <i>The consumer-grade router product developer has the ability to receive information relevant to cybersecurity and respond to queries from the customer and others about information relevant to cybersecurity.</i>	-
Information Dissemination <i>The consumer-grade router product developer broadcasts (e.g., to the public) and distributes (e.g., to the customer or others in the consumer-grade router product ecosystem) information relevant to cybersecurity.</i>	CL AR-001, SBOM-011 BSI (4.2) IMDA 4.3e
Education and Awareness <i>The consumer-grade router product developer creates awareness of and educates customers and others in the consumer-grade router product ecosystem about cybersecurity-related information (e.g., considerations, features, risks) related to the consumer-grade router product and its product components.</i>	-

683 The standards do not thoroughly address the non-technical outcomes, but NIST reiterates that
 684 consumer-grade router products should be supported by all the non-technical outcomes
 685 included in this profile. Implementation of non-technical outcomes may not have to be tailored
 686 for a product type (i.e., consumer-grade routers) and may be deployed similarly for different
 687 digital products. For example, a vulnerability management program is not likely to vary
 688 significantly in implementation for consumer-grade routers, smart thermostats, personal
 689 computers, etc. Thus, product-agnostic approaches to the non-technical outcomes as discussed
 690 in the *Product Development Cybersecurity Handbook* are recommended in addition to the non-
 691 technical requirements included in the four consumer-grade router standards. The handbook
 692 guides a developer through important cybersecurity considerations when developing digital
 693 products. Though the handbook is generally contextualized around IoT products, the concepts
 694 discussed can apply to any digital product with a physical component in the customer’s
 695 environment (e.g., consumer-grade router device). There are many non-technical cybersecurity
 696 considerations discussed in the handbook, but the following are key considerations for
 697 consumer-grade router products given the role these devices play in home networks:

698 **Risk management** in both planning and execution of consumer-grade router products
 699 will help identify and mitigate cybersecurity risks throughout the product lifecycle. Risks
 700 faced by consumer-grade router products can be significant. Consumer-grade router

701 devices have a unique vantage and access to home networks. They also have robust
702 networking capabilities, giving them utility for a wide range of attacks. Other consumer-
703 grade router product components present their own risks. Backends may aggregate
704 data from one or more customers, making them attractive targets for attackers. Mobile
705 applications may be installed in relatively hostile environments due to malware and
706 other vectors of attack. ISO 31000 [[ISO31000](#)] is a foundational resource that developers
707 should use for risk management. NIST's *Risk Management Framework for Information*
708 *Systems and Organizations: A System Life Cycle Approach for Security and Privacy*, SP
709 800-37 Rev. 2 [[SP800-37r2](#)] may also be useful guidance for risk management.

710 **Secure development processes** for both hardware and software are also critical for the
711 cybersecurity of consumer-grade router products. *Hardware-Enabled Security: Enabling*
712 *a Layered Approach to Platform Security for Cloud and Edge Computing Use Cases*,
713 NISTIR 8320 [[IR8320](#)] may be a helpful resource for consumer-grade router product
714 developers as they consider hardware in relation the cybersecurity of their products. A
715 recommended resource available to all software developers is NIST's Secure Software
716 Development Framework [[SSDF](#)], which includes fundamental, sound, and secure
717 software development practices. The SSDF can help a software developer align and
718 prioritize its secure software development activities with its business and mission
719 requirements, risk tolerances, and resources. Like NISTIR 8425, the SSDF's practices are
720 outcome-based. The SSDF's practices, tasks, and implementation examples represent a
721 starting point to consider. In the context of consumer-grade router products, all SSDF
722 practices are recommended to be implemented as part of the software development
723 lifecycle of a consumer-grade router products' firmware and other software. Some SSDF
724 practices may be more applicable to certain types of software. Appendix B presents a
725 detailed crosswalk listing all SSDF tasks and their applicability to three kinds of firmware
726 or software commonly part of consumer-grade router products: router firmware,
727 mobile applications, remote backend or web applications.

728 **Vulnerability management** is critical for consumer-grade router products and is
729 addressed by portions of all four non-technical cybersecurity outcomes. Manufacturers
730 should develop a robust vulnerability management plan for their products that will
731 identify vulnerabilities to quickly and effectively mitigate them in their products. For
732 this, they should use ISO/IEC 29147 [[ISO29147](#)] and ISO/IEC 30111 [[ISO30111](#)], which
733 are important resources for vulnerability disclosure and handling, respectively. From
734 NIST, *Guide to Enterprise Patch Management Planning: Preventive Maintenance for*
735 *Technology*, SP 800-40 Rev. 4 [[SP800-40r4](#)] can also be a helpful resource for consumer-
736 grade router product developers as they plan for, discover, prioritize, and respond to
737 vulnerabilities in their products.

738 **Customer engagement on cybersecurity**, which is called Education and Awareness in
739 the non-technical outcomes, facilitates use of technical cybersecurity features and
740 adoption of good cybersecurity by customers. ISO/IEC/IEEE 26514 [[ISO26514](#)] provides
741 guidance on the design and development of information for users, which may be helpful

742 to and is recommended for consumer-grade router product developers as they create
743 the manual and other materials for the device that a customer may seek out for
744 cybersecurity instructions related to the product.

745 These are highlighted considerations. Manufacturers should implement robust non-technical
746 cybersecurity support that includes all aspects of documenting cybersecurity pertinent
747 information, establishing means to receive and disseminate cybersecurity pertinent information
748 related to the product, and fostering cybersecurity education and awareness among customers
749 related to the product.

750 **Appendix C. Consumer-Grade Router Acquisition Scenarios Discussion**

751 *Routers* are network devices that forward data packets, most commonly Internet Protocol (IP)
 752 packets, between networked systems. They may be wired (e.g., Ethernet), wireless (e.g., Wi-Fi),
 753 or both. *Consumer-grade* identifies those routers that may appear in an individual’s residence
 754 such that their primary use case is residential rather than enterprise, industrial, etc. However,
 755 some small businesses may choose to use consumer grade equipment given the limited
 756 performance needs of those businesses. The presumption for consumer equipment, or small
 757 businesses that use consumer grade equipment, is that the manufacturer cannot assume the
 758 user has cybersecurity expertise or an ability to take significant action to secure the product.

759 Consumer-grade routers may be acquired by households in at least two ways⁶:

- 760 1. Purchase of the equipment directly from a retailer.
- 761 2. Bundling and/or renting of the equipment from a service provider.

762 Each of these scenarios may have implications for how cybersecurity outcomes could be met by
 763 the consumer-grade router product. Consumer-owned equipment may be fully managed by the
 764 household or may have some security services provided externally. Alternatively, bundled
 765 and/or rental equipment will likely be managed in part by the service provider.

766 **Table 2. Scope Coverage of the Consumer-Grade Router Standards Analyzed**

Consumer-Grade Router Standard	Applicable to...	
	Consumer-Owned Routers?	ISP-Owned, Customer-Leased Routers?
TR-124 Issue 8 [BBF]	Yes	Yes
Gateway Device Security Best Common Practices [CableLabs]	Yes	Yes
Secure Broadband Routers [BSI]	Yes	Yes
Security Requirements for Residential Gateways [IMDA]	Yes	No

767
 768 As summarized in **Table 2**, the scope statements of three of the four standards examined either
 769 make no distinction about how the router is acquired by customers or state that the guidance
 770 applies to both scenarios.

771 BBF does not distinguish between the two methods of acquisition, stating “a Residential
 772 Gateway implementing the general requirements of TR-124 will incorporate at least one
 773 embedded WAN interface, routing, bridging, a basic or enhanced firewall, one or multiple LAN
 774 interfaces and home networking functionality that can be deployed as a consumer self-
 775 installable device.” It notably highlights that included are products that can be deployed as
 776 “consumer self-installable,” which includes the customer purchased scenario, as well as most
 777 instances of service provider supplied routers.

778 CableLabs directly acknowledges both scenarios: “This Gateway Device Security document
 779 specifies best common practices to serve as an industry metric for retail and leased devices
 780 (both gateways and cable modems) for security—this includes manufacturing process, supply

⁶ As of 2022, about half of consumer-grade routers are received from ISPs rather than acquired by customers directly. [ParksRouterResearch]

781 chain, hardware and firmware configuration procedures, software, and management
782 protocols.”

783 The German Federal Office for Information Security (BSI) focuses its requirements on how the
784 product is used rather than acquired, stating “In scope of this Technical Guideline are
785 requirements on a router as a hardware component with an installed operating system and
786 services provided to an end-user. The router serves the purpose of establishing a connection to
787 the infrastructure of an Internet Access Provider (IAP) to gain internet access. From the end-
788 user’s perspective the router offers a gateway to the internet as well as management
789 functionalities for the end-user’s private network. The Technical Guideline describes
790 requirements on the router that should be implemented to offer a secure operation of the
791 router for the end-user.” Thus, the requirements can be applied to the scenario of when
792 customers purchase a router and when a router is provided by or rented from a service
793 provider.

794 Unlike the others, the IMDA alludes to a focus on only routers purchased by customers, stating
795 that the goal is “ensuring that these devices are better protected when purchased and
796 deployed by consumers.”

797 **Appendix D. Crosswalk Between Secure Software Development Tasks and Consumer-Grade**
 798 **Router Product Software Type**

799 This appendix presents a informational crosswalk listing all SSDF tasks, copied directly from the
 800 SSDF. To provide additional insight into NIST’s thinking of how the SSDF can be used in the
 801 context of consumer-grade routers, applicability of each SSDF task to three kinds of code
 802 commonly part of consumer-grade router products: router firmware, mobile applications,
 803 remote backend or web applications.

- 804 • *Router firmware* is a form of device firmware specific to consumer-grade router devices.
 805 *Device firmware* generally is “the collection of non-host processor firmware and
 806 Expansion ROM firmware that is only used by a specific device. This firmware is typically
 807 provided by the device manufacturer” [SP800-193].
- 808 • *Mobile applications* are software intended to be installed and/or executed on small
 809 profile platforms that can connect to cellular data networks. For example, applications
 810 made to run on Apple’s iOS or Alphabet’s Android operating systems.
- 811 • *Remote backend or web applications* are software intended to be hosted and executed
 812 on dedicated or shared servers that may provide services to many products at once. For
 813 example, code supporting consumer-grade routers that is hosted in a cloud
 814 environment.

815 **Table 3** below indicates which SSDF tasks may be most appropriate for each kind of firmware or
 816 software. SSDF tasks that may be appropriate to a software type, but utilization of the task may
 817 be contextual to the development process or environment are noted with (parentheses).

818 **Table 3. Crosswalk between consumer-grade router product software types and SSDF tasks.**

SSDF Task	Recommended for Router...
PO.1.1: Identify and document all security requirements for the organization’s software development infrastructures and processes, and maintain the requirements over time.	Firmware, Mobile App., Web App.
PO.1.2: Identify and document all security requirements for organization-developed software to meet, and maintain the requirements over time.	Firmware, Mobile App., Web App.
PO.1.3: Communicate requirements to all third parties who will provide commercial software components to the organization for reuse by the organization’s own software. [Formerly PW.3.1]	Firmware, Mobile App., Web App.
PO.2.1: Create new roles and alter responsibilities for existing roles as needed to encompass all parts of the SDLC. Periodically review and maintain the defined roles and responsibilities, updating them as needed.	Firmware, Mobile App., Web App.
PO.2.2: Provide role-based training for all personnel with responsibilities that contribute to secure development. Periodically review personnel proficiency and role-based training, and update the training as needed.	Firmware, Mobile App., Web App.
PO.2.3: Obtain upper management or authorizing official commitment to secure development, and convey that commitment to all with development-related roles and responsibilities.	(Firmware), (Mobile App.), (Web App.)

SSDF Task	Recommended for Router...
PO.3.1: Specify which tools or tool types must or should be included in each toolchain to mitigate identified risks, as well as how the toolchain components are to be integrated with each other.	Firmware, Mobile App., Web App.
PO.3.2: Follow recommended security practices to deploy, operate, and maintain tools and toolchains.	Firmware, Mobile App., Web App.
PO.3.3: Configure tools to generate artifacts of their support of secure software development practices as defined by the organization.	(Firmware), (Mobile App.), (Web App.)
PO.4.1: Define criteria for software security checks and track throughout the SDLC.	(Firmware), (Mobile App.), (Web App.)
PO.4.2: Implement processes, mechanisms, etc. to gather and safeguard the necessary information in support of the criteria.	Firmware, Mobile App., Web App.
PO.5.1: Separate and protect each environment involved in software development.	Firmware, Mobile App., Web App.
PO.5.2: Secure and harden development endpoints (i.e., endpoints for software designers, developers, testers, builders, etc.) to perform development-related tasks using a risk-based approach.	Firmware
PS.1.1: Store all forms of code – including source code, executable code, and configuration-as-code – based on the principle of least privilege so that only authorized personnel, tools, services, etc. have access.	Firmware, Mobile App., Web App.
PS.2.1: Make software integrity verification information available to software acquirers.	(Web App.)
PS.3.1: Securely archive the necessary files and supporting data (e.g., integrity verification information, provenance data) to be retained for each software release.	Firmware, Mobile App.
PS.3.2: Collect, safeguard, maintain, and share provenance data for all components of each software release (e.g., in a software bill of materials).	Firmware, Mobile App.
PW.1.1: Use forms of risk modeling – such as threat modeling, attack modeling, or attack surface mapping – to help assess the security risk for the software.	Firmware, (Mobile App.), (Web App.)
PW.1.2: Track and maintain the software’s security requirements, risks, and design decisions.	Firmware, Mobile App., Web App.
PW.1.3: Where appropriate, build in support for using standardized security features and services (e.g., enabling software to integrate with existing log management, identity management, access control, and vulnerability management systems) instead of creating proprietary implementations of security features and services. [Formerly PW.4.3]	Firmware, Mobile App., Web App.
PW.2.1: Have 1) a qualified person (or people) who were not involved with the design and/or 2) automated processes instantiated in the toolchain review the software design to confirm and enforce that it meets all of the security requirements and satisfactorily addresses the identified risk information.	Firmware
PW.4.1: Acquire and maintain well-secured software components (e.g., software libraries, modules, middleware, frameworks) from commercial, open-source, and other third-party developers for use by the organization’s software.	Firmware, Mobile App., Web App.

SSDF Task	Recommended for Router...
PW.4.2: Create and maintain well-secured software components in-house following SDLC processes to meet common internal software development needs that cannot be better met by third-party software components.	Firmware, Mobile App., Web App.
PW.4.4: Verify that acquired commercial, open-source, and all other third-party software components comply with the requirements, as defined by the organization, throughout their life cycles.	Firmware, Mobile App., Web App.
PW.5.1: Follow all secure coding practices that are appropriate to the development languages and environment to meet the organization's requirements.	Firmware, Mobile App., Web App.
PW.6.1: Use compiler, interpreter, and build tools that offer features to improve executable security.	Firmware, Mobile App., Web App.
PW.6.2: Determine which compiler, interpreter, and build tool features should be used and how each should be configured, then implement and use the approved configurations.	Firmware, Mobile App., Web App.
PW.7.1: Determine whether code review (a person looks directly at the code to find issues) and/or code analysis (tools are used to find issues in code, either in a fully automated way or in conjunction with a person) should be used, as defined by the organization.	Firmware, Mobile App., Web App.
PW.7.2: Perform the code review and/or code analysis based on the organization's secure coding standards, and record and triage all discovered issues and recommended remediations in the development team's workflow or issue tracking system.	Firmware, Mobile App., Web App.
PW.8.1: Determine whether executable code testing should be performed to find vulnerabilities not identified by previous reviews, analysis, or testing and, if so, which types of testing should be used.	Firmware, Mobile App., Web App.
PW.8.2: Scope the testing, design the tests, perform the testing, and document the results, including recording and triaging all discovered issues and recommended remediations in the development team's workflow or issue tracking system.	Firmware, (Mobile App.), (Web App.)
PW.9.1: Define a secure baseline by determining how to configure each setting that has an effect on security or a security-related setting so that the default settings are secure and do not weaken the security functions provided by the platform, network infrastructure, or services.	Firmware, Mobile App., Web App.
PW.9.2: Implement the default settings (or groups of default settings, if applicable), and document each setting for software administrators.	Firmware, Mobile App., Web App.
RV.1.1: Gather information from software acquirers, users, and public sources on potential vulnerabilities in the software and third-party components that the software uses, and investigate all credible reports.	Firmware, Mobile App., Web App.
RV.1.2: Review, analyze, and/or test the software's code to identify or confirm the presence of previously undetected vulnerabilities.	Firmware, Mobile App., Web App.
RV.1.3: Have a policy that addresses vulnerability disclosure and remediation, and implement the roles, responsibilities, and processes needed to support that policy.	Firmware, Mobile App., Web App.
RV.2.1: Analyze each vulnerability to gather sufficient information about risk to plan its remediation or other risk response.	Firmware, Mobile App., Web App.

SSDF Task	Recommended for Router...
RV.2.2: Plan and implement risk responses for vulnerabilities.	Firmware, Mobile App., Web App.
RV.3.1: Analyze identified vulnerabilities to determine their root causes.	Firmware, Mobile App., Web App.
RV.3.2: Analyze the root causes over time to identify patterns, such as a particular secure coding practice not being followed consistently.	Firmware, Mobile App., Web App.
RV.3.3: Review the software for similar vulnerabilities to eradicate a class of vulnerabilities, and proactively fix them rather than waiting for external reports.	(Firmware), (Mobile App.), (Web App.)
RV.3.4: Review the SDLC process, and update it if appropriate to prevent (or reduce the likelihood of) the root cause recurring in updates to the software or in new software that is created.	(Firmware), (Mobile App.), (Web App.)

819 **Appendix E. List of Symbols, Abbreviations, and Acronyms**

- 820 BBF
- 821 Broadband Forum

- 822 BSI
- 823 Federal Office for Information Security

- 824 CL
- 825 CableLabs

- 826 IMDA
- 827 Infocomm Media Development Authority

- 828 IoT
- 829 Internet of Things

830 **Appendix F. Glossary**

831 **consumer-grade router device**

832 Networking devices which are primarily intended for residential use and can be installed by the customer. Routers
833 forward data packets, most commonly Internet Protocol (IP) packets, between networked systems.

834 **consumer-grade router product**

835 Consumer-grade router device and any additional product components (e.g., backend, smartphone application)
836 that are necessary to use the consumer-grade router device beyond basic operational features. [\[IR8425\]](#), adapted]

837 **cybersecurity outcome**

838 Statement of what is expected either from a product or from an organization in support of a product related to the
839 cybersecurity of that product. Can be technical, in the form of product cybersecurity capabilities or non-technical,
840 in the form of non-technical supporting capabilities.

841 **non-technical supporting capability**

842 Non-technical supporting capabilities are actions an organization performs in support of the cybersecurity of a
843 product. [\[IR8425\]](#), adapted]

844 **product cybersecurity capability**

845 Cybersecurity features or functions that computing devices provide through their own technical means (i.e., device
846 hardware and software). [\[IR8425\]](#)