

Network Device Interpretation # 202508

Clarification on FIA_AFL.1 Application Note 118 regarding reboot-based lockout recovery

Status: ☒ *Active* ☐ *Inactive*

Date: 14-Jul-2025

End of proposed Transition Period (to be updated after TR2TD process): [Click here to enter a date.](#)

Type of Change: ☒ Immediate application ☐ Minor change ☐ Major change

Type of Document: ☒ *Technical Decision* ☐ *Technical Recommendation*

Approved by: ☒ *Network iTC Interpretations Team* ☐ *Network iTC*

Affected Document(s): *NDcPP v3.0e, NDSD v3.0e*

Affected Section(s): *FIA_AFL.1*

Superseded Interpretation(s): *None*

Issue:

In NDcPPv3.0e, FIA_AFL.1, Application Note 118 states that, to avoid situations where administrator access becomes unavailable either temporarily or permanently, the TOE should provide mechanisms such as local logon or remote logon using methods other than passwords.

In addition to these methods, it appears that implementing a mechanism by which all administrator accounts can be recovered from lockout via a reboot operation could also satisfy the intent of the requirement. However, this interpretation is not clearly supported by the wording of the PP or the Supporting Document, and we would appreciate clarification on whether such an implementation is acceptable.

Proposed resolution:

In NDcPPv3.0e, FIA_AFL.1, Application Note 118 shall be replaced as follows:

{old}

...

The TSS describes how the TOE ensures that authentication failures by remote Administrators cannot lead to a situation where no Administrator access is available, either permanently or temporarily (e.g. by providing local logon which is not subject to blocking).

...

{/old}

by

{new}

...

The TSS describes how the TOE ensures that authentication failures by remote Administrators cannot lead to a situation where no Administrator access is available, either permanently or temporarily (e.g. by providing local logon which is not subject to blocking, or by allowing a reboot to clear the lockout status and restore administrator access).

...

{/new}

Resolution:

The NIT believes that the usage scenario described in the Issue section above violates the intent of the FIA_AFL.1 requirement and is not currently supported by the NDcPP.

Rationale:

The NIT believes approving this request would essentially waive the FIA_AFL.1 requirement, which the NIT does not currently support. Such a drastic change would be better accommodated in a future version of the NDcPP, if needed.

Further Action:

None

Action by Network ITC:

None