



UNITED STATES MARINE CORPS

MARINE FORCES RESERVE
4400 DAUPHINE STREET
NEW ORLEANS, LOUISIANA 70146-5400

IN REPLY TO:
ForO 2280.1
G-6/EKMS
NOV 6 2008

FORCE ORDER 2280.1

From: Commander, Marine Forces Reserve
To: Distribution List

Subj: ELECTRONIC KEY MANAGEMENT SYSTEM(EKMS) ACCOUNT
MANAGEMENT AND CONTROL PROCEDURES

Ref: (a) EKMS 1A
(b) EKMS 3B
(c) MCO 2280.1
(d) MCO P4400.150E
(e) MCO P4400.151B
(f) MCO 4400.172
(g) MCO P5530.14
(h) SECNAVINST 5510.36A
(i) SECNAV M-5510.36

1. Situation. Communications Security (COMSEC) is a command responsibility; it is also the responsibility of each individual user of communication systems and networks. The G-6/S-6 is responsible to the commander for the overall planning, supervision, and coordination of COMSEC matters, including the administrative, day-to-day management of COMSEC material.

2. Mission. To establish policies, procedures, responsibilities and standards for Marine Forces Reserve (MARFORRES) activities which have EKMS accounts, or those which have a requirement to establish an EKMS account. The policies in this order are derived from those set forth in references (a), (b) and (c); and in no way alters or amends the provisions of those references.

3. Execution

a. Commander's Intent and Concept of Operations.

(1) Commander's Intent. To ensure that MARFORRES EKMS accounts are being managed in an appropriate and responsible manner. The intent of this order is to provide MARFORRES EKMS Managers and Unit Commanders with guidance specific to MARFORRES accounts. In some areas this order is more stringent than the guidance provided in references (a) thru (c).

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(2) Concept of Operations. Strict adherence to all established national COMSEC and Department of the Navy (DON) EKMS policies and procedures by all users of COMSEC is mandatory. To ensure that EKMS Managers are adhering to the policies set forth in this Order, biennial EKMS inspections will be conducted in accordance with reference (b).

b. Subordinate Element Mission. Proper handling and protection of COMSEC material is the inherent responsibility of each and every individual to whom it is entrusted. The responsibilities of organizations identified in this Order are those related to EKMS account management matters only and are not all-inclusive of each organization's mission and functions.

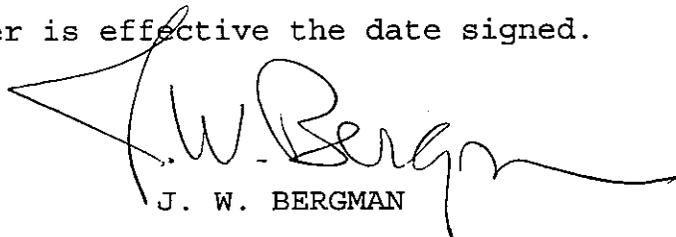
c. Coordinating Instructions

4. Administration and Logistics. Recommendations concerning the contents of this Order may be forwarded to MARFORRES G-6 via the appropriate chain-of command.

5. Command and Signal

a. Command. This Order is applicable to Marine Forces Reserve.

b. Signal. This Order is effective the date signed.



J. W. BERGMAN

DISTRIBUTION B: ALL FORCE, 4TH MARDIV, 4TH MLG AND
4TH MAW ASSETS

LOCATOR SHEET

Subj: ELECTRONIC KEY MANAGEMENT SYSTEM (EKMS) ACCOUNT
MANAGEMENT AND CONTROL PROCEDURES

Location: _____
(Indicate the location(s) of the copy(ies) of this Order.)

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CHAPTER 1

ELECTRONIC KEY MANAGEMENT SYSTEM (EKMS) ACCOUNT MANAGEMENT

GENERAL

SECTION 1: RESPONSIBILITIES

1. GENERAL. Proper handling and protection of Communications Security (COMSEC) material is the inherent responsibility of each and every individual to whom it is entrusted. See reference (a) for National, Department of the Navy (DON) and account level responsibilities. The responsibilities of organizations identified in this Force Order are those related to EKMS account management matters only and are not all-inclusive of each organization's mission and functions.

a. COMMANDANT OF THE MARINE CORPS (CMC). CMC Command, Control, Communication and Computers, Information Assurance (C4IA) is the Marine Corps focal point for requirements and administration of Marine Corps EKMS accounts. Responsibilities include, but are not limited to:

(1) Conducting primary liaison with DON, other services and other government agencies on COMSEC matters of relevance to or impacting the Marine Corps.

(2) Submission of Marine Corps equipment requirements to the Chief of Naval Operations (CNO).

(3) Coordination of policies and procedures with CMC (C4IA), Navy Communications Security Material System (NCMS) and Commander, Naval Network Warfare Command (NETWARCOM) for the administration and management of Marine Corps EKMS accounts.

(4) Approval and/or disapproval of Marine Corps EKMS account establishment/disestablishment/realignment.

(5) Approval and/or disapproval of Marine Corps EKMS personnel waiver requests.

(6) Review and evaluation of all Marine Corps COMSEC incidents.

(7) Review and evaluation of Marine Corps EKMS account inspections.

(8) Validation of original authorized holdings for Marine Corps supporting establishments.

(9) Management of Marine Corps supporting establishment COMSEC equipment within the parameters of EKMS.

b. COMMANDING GENERAL, MARINE CORPS SYSTEMS COMMAND (CG MARCORSYSCOM). MARCORSYSCOM Communications, Intelligence & Networking Systems (CINS) is responsible for:

(1) Development of tactical COMSEC equipment operating procedures (based on already-defined, CMC-directed policy).

(2) Providing fielding, provisioning, and logistical support for Marine Corps COMSEC equipment.

(3) Draft and promulgate COMSEC equipment Material Fielding Plans.

(4) Manage Marine Corps Fleet Marine Force (FMF) COMSEC equipment within the parameters of EKMS.

(5) Develop proposed keying concepts, key management plans and security plans for new COMSEC systems.

c. COMMANDER, MARINE FORCES RESERVE (COMMARFORRES). COMMARFORRES is the Immediate Superior in Command (ISIC) for EKMS matters and is responsible for the following:

(1) Validate subordinate activities' requirements for original authorized holdings and account increases or decreases of COMSEC material.

(2) Validate Force COMSEC equipment requirements to CG MARCORSYSCOM.

(3) Ensure subordinate commands/units comply with established policies and procedures.

(4) Validate requests for account establishment and disestablishment to CMC (C4IA).

(5) Provide final command certification and authority to store COMSEC material to subordinate commands.

(6) Establish and/or validate initial authorized COMSEC material holdings of subordinate accounts.

(7) Validates waiver requirements of subordinate commands to CMC (C4IA).

(8) Coordinate with Inspection Program Coordinator (G-7) prior to scheduling any inspections.

(9) Conduct mandatory unannounced inspections of subordinate commands.

(10) Provide training assistance on request.

(11) Provide on call guidance to EKMS Managers on proper management of EKMS accounts and management systems.

(12) Ensure subordinate EKMS elements are in compliance with all references.

(13) Command Authority for Secure Telephone Unit (STU) III/Secure Terminal Equipment (STE) User Representative.

(14) Forward a copy of all formal inspection and re-inspection results to MARFORRES Commanding General Inspector (CGI).

2. OPERATIONAL CHAIN OF COMMAND. The operational chain of command is responsible for COMSEC interoperability among subordinates and for establishing and promulgating operational COMSEC material requirements to subordinates under their operational control, to include validation of requirements for COMSEC keying material to the Immediate Superior in Command (ISIC).

3. G-6/S-6. The G-6/S-6 will have primary cognizance over the command's EKMS account. The G-6/S-6's responsibilities include:

a. Keeping the Commander abreast of all COMSEC matters relating to the command and the command's subordinate units.

b. Monitoring the command's COMSEC requirements, to include coordinating with other appropriate staff officers, both within the command and external to the command, to ensure that the command's COMSEC plans and programs are an integral part of the command's Operational Security (OPSEC) and Command, Control, Communications and Countermeasures (C3CM) planning.

c. Advising subordinate commands in a timely manner (not less than 60 days in advance, if known) of COMSEC keying material requirements for operations and exercises.

d. Advising the EKMS account Manager of changes in COMSEC software and hardware material requirements in a timely manner.

e. Acting as the command's item manager for cryptographic hardware by coordinating with the supply officer and EKMS manager to ensure that cryptographic hardware is properly reported in supply system reporting records, as well as in the EKMS system.

f. Coordinating with the command's embarkation officer and operations officer to ensure that cryptographic hardware is included in the time phase force deployment data (TPFDD).

g. When required, recommends reallocation of COMSEC assets among subordinate commands to ensure maximum benefit is achieved from utilization of all available assets.

h. Ensure COMSEC training is conducted for all Local Elements (LE) (user and issuing) on an annual basis.

i. Performing controlling authority duties for keying material for which the command is assigned as controlling authority.

j. Coordinate with MARFORRES ISIC, CMC (C4IA), NCMS and account managers on all matters relating to EKMS account establishment/disestablishment within the force.

k. Coordinate with MARFORRES ISIC, CMC (C4IA), NCMS, Defense Courier Service (DCS) and account managers in cases of temporary suspension. This would normally occur during extended deployment of account managers as they relate to specific commands and/or, when an account has an extended billet gap.

SECTION 2: ACCOUNT ESTABLISHMENT/DISESTABLISHMENT/REALIGNMENT

1. DETERMINING THE REQUIREMENT TO ESTABLISH AN EKMS ACCOUNT. Prior to requesting establishment of an EKMS account, consideration should be given to the feasibility of becoming a LE issuing or LE user from a geographically collocated EKMS account.

a. In most instances, it is more practical for commands which deploy frequently, require large holdings of EKMS material, or, which are not collocated with another command having a EKMS account, to establish their own EKMS account.

b. Becoming a LE issuing/LE user may be more practical for non-deploying activities or those activities which have infrequent and/or small amounts of EKMS material. Parent

accounts do not have to be in the LE's chain of command, provided a letter of agreement is executed by all involved parties. See reference (a) ANNEX K for a sample letter of agreement.

c. Non-deploying units which are always collocated with their parent EKMS account, normally should be designated as a LE user.

2. REQUESTING ESTABLISHMENT OF AN EKMS ACCOUNT. Requests to establish a Marine Corps EKMS account must be submitted to COMMARFORRES G-6, with information copy to NCMS WASHINGTON DC N31, CMC WASHINGTON DC (C4IA) via the administrative chain of command, with information copies to CG MARCORSYSCOM QUANTICO VA//CINS//, NCMS administrative chain of command, SPAWAR//PMW 161//, CMIO NORFOLK VA //N3//, SPAWARSYSCEN CHARLESTON SC//80P/526CS/721AE//, the applicable Central Office of Record (COR), Controlling Authority(ies) (CONAUTHs) of all required COMSEC material, and local Advice and Assistance (A&A) Team. The MARFORRES ISIC must provide favorable endorsements prior to CMC approval of the requests. (See reference (a) for requirements for establishing an EKMS account).

3. DETERMINING THE REQUIREMENT TO DISESTABLISH AN EKMS ACCOUNT. A command should not disestablish its EKMS account due to a temporary termination of COMSEC requirements. MARFORRES units and commanders undergoing reorganization or a temporary stand-down should advise MARFORRES G-6, info the CMIO, NCMS WASHINGTON DC//N3//, the servicing DCS station, and the chain of command, via message, specifying the inclusive dates for which keying material is not required. A follow-on message must be submitted to the same action/info addressees requesting resumption of automatic distribution service. The follow-on message must be submitted a minimum of 45 days prior to the date service is to resume.

4. REQUESTING DISESTABLISHMENT/REALIGNMENT OF AN EKMS ACCOUNT. Prior to requesting disestablishment of an EKMS account, commands must coordinate with COMMARFORRES G-6/EKMS and G-4 Supply for disposition instructions on COMSEC equipment assets. The MARFORRES G-6/EKMS and G-4 Supply will either redistribute assets internally or forward requests to CG MARCORSYSCOM for disposition instructions.

a. Requests for disestablishment/realignment of EKMS accounts must be submitted to COMMARFORRES G-6, CMC (C4IA), via the administrative chain of command, with an information copy to NCMS and CMIO, at least 60 days prior to the projected disestablishment date.

b. Requests for account disestablishment must also include a complete list of all EKMS material for which disposition instructions are required. MARFORRES must provide favorable endorsement prior to CMC approval of the request.

c. See Chapter 8 of reference (a) for additional requirements for disestablishing an EKMS account.

d. In cases when a MARFORRES EKMS account or LE is augmented to support an active Marine Expeditionary Force (MEF)/Division (DIV)/WING/Marine Logistics Group (MLG), the element then becomes subordinate to that gaining force command (GFC) ISIC.

SECTION 3: PERSONNEL ASSIGNMENTS

1. PERSONNEL ASSIGNMENTS. Personnel assignment requirements for MARFORRES EKMS accounts are more stringent than those for Navy EKMS accounts.

a. COMSEC MANAGER PERSONNEL

(1) Required Number of Alternate Managers. MARFORRES EKMS accounts are strongly encouraged to assign a manager and three alternate managers. However, a minimum of two alternate managers must be assigned in order to maintain two person integrity (TPI) for destruction and DCS pick-up of COMSEC material. If the account maintains Top Secret material, the Commanding Officer may exercise his/her option to assign three alternates instead of two, the second alternate manager will be a "roving" manager in order to maintain TPI during the absence of the EKMS Manager or primary alternate manager. The second alternate manager will not have continual access to or knowledge of material. During the absence of the manager or primary alternate manager (i.e., leave, temporary additional duty (TAD), training, etc.), the second alternate manager may be given the combination normally held by the individual who will be absent. If the second alternate manager must gain access to a TPI container combination, the combination of either combination to security containers used to store TPI will be changed upon return of the absent manager in order to allow the second alternate access to either combination during subsequent absences. By incorporating these procedures, access to the material will be available at all times without impingement upon the restriction that only EKMS Manager personnel may have access to the combinations. This will also eliminate the requirement for an unauthorized access incident report and complete inventory of the security container.

(2) Minimum Time Remaining on Station. Individuals with less than twenty-four months remaining on station will not be assigned EKMS custodial duties.

(3) Mandatory Training. MARFORRES military personnel who have not completed the formal EKMS Manager's Course (A-4C-0013) may be assigned as an alternate custodian only and will not be assigned as the EKMS Manager. An alternate EKMS Manager must be

redesignated as the EKMS Manager until the new individual has received formal training. Once formal training has been completed, the individual may be redesignated as the Manager. Commands establishing new EKMS accounts may assign personnel prior to completion of training, however, formal training requirements must be met within 90 days of appointment. Upon completion of the EKMS COI all managers will forward a copy of the appointment letter and a copy of the certificate of completion to the ISIC.

(4) Verification of Security Clearances. Security clearances must be verified prior to assignment of EKMS Manager duties. Security clearances may be upgraded (e.g. from SECRET to TOP SECRET) on an interim basis by the Commanding Officer in accordance with references (J) and (K), once all appropriate action has been completed to initiate the upgrade of the individual's security clearance. MARFORRES EKMS accounts are required to append a copy of the Joint Personnel Adjudication System (JPAS) printout (to include upgrade request) as an enclosure to letters of appointment. The JPAS printouts must be updated annually to ensure that the access is still valid.

(5) Contact Relief. When a change of EKMS Manager is necessary, except in emergencies, the new manager must be appointed in sufficient time to allow for completion of formal EKMS training and a minimum of 30 day's contact relief. An alternate EKMS Manager (E-6 or above) must be assigned as the EKMS Manager if the individual selected to become the new manager is inbound from another command and does not arrive in sufficient time to meet the training and contact relief requirements.

(6) Alternate Manager's Participation in Account Management. Alternate EKMS Managers must share the responsibility for proper management of the account with the EKMS Manager. To remain current in their knowledge of the EKMS account administration and the status of the daily operations of the account, each alternate is required to assist in the account's management on a monthly basis, at a minimum. Alternate managers should be held equally responsible with the account manager for the proper management of the account.

(7) Collateral Duties. EKMS Managers and alternate managers may be assigned a maximum of five collateral duties, provided that the collateral duties do not interfere with the performance of EKMS duties.

b. EKMS Clerk. The assignment of an EKMS clerk is optional. However, if an EKMS clerk is assigned, the clerk will not function as an alternate custodian. Although clerks may assist with EKMS material receipt, issue, inventory, destruction etc., and may also be used to maintain two person integrity protection of material

once security containers are opened, clerks are not alternate custodians and will not routinely perform EKMS Managerial duties in place of an alternate manager. Under no circumstances will the clerk have knowledge of any combination to the EKMS spaces or any security container that contains COMSEC material.

c. Staff Communications Security Material System (CMS) Responsibility Officer. Flag-level officers, those officers serving in a flag-level position, and in accordance with reference (c), commanders of USMC reserve commands which are supported by an Inspector-Instructor (I&I) staff or Site Commander is authorized to assign a Staff CMS Responsibility Officer (SCMSRO).

- (1) SCMSROs assigned by flag-level officers, or those officers serving in a flag-level position, must be an O-4/GS-12 or higher.
- (2) Commanders of USMC reserve commands must assign the I&I or the Site Commander as the SCMSRO.
- (3) Assignment of the SCMSRO must be in writing.
- (4) Responsibilities of the SCMSRO may not be further delegated and must revert to the appointing official, in the absence of the SCMSRO.
- (5) SCMSROs will become familiar with reference (a) and must complete a three hour briefing on COMSEC for Commanding Officers (COs).
- (6) Authority to appoint a SCMSRO is not authorization for total delegation of all account responsibilities. Commanders of USMC reserve commands must remain fully active in the account's administration during periods of active duty. SCMSRO's must be given, in writing, authorization to sign all routine correspondence and reports, as determined by the appointing official. Requests for account establishment or disestablishment and correspondence relating to COMSEC incidents are not considered routine correspondence and reports. However, COMSEC incident reports must not be delayed due to the absence of the commander and may be signed by the SCMSRO to expedite reporting.
- (7) SCMSROs must sign all CMS correspondence and reports as the SCMSRO vice "By Direction." NOTE: Individual's assuming the duties of the Commanding Officer (CO), during the CO's absence must sign EKMS correspondence and reports as "Acting" vice "By Direction".

d. Security Manager. The Security Manager's realm of responsibility is limited to matters and material which are routine security management procedures and shall not detract from the EKMS Manager's authority for EKMS related security matters. The Security Manager is responsible for ensuring that appropriate physical security inspections and surveys are conducted, that security clearances and special access authorizations (other than EKMS) are up-to-date and accurate, that handling and storage of classified material other than COMSEC material are in compliance with the DON Security Program, and for conducting initial investigations of possible insecurities and/or COMSEC incidents. NOTE: EKMS Managers who are appointed as the Alternate Security Manager are not authorized to conduct Physical Security Evaluations (PSE) on their own EKMS spaces.

CHAPTER 2

SECTION 1: EQUIPMENT MANAGEMENT

1. MANAGEMENT OF MARFORRES EQUIPMENT ASSETS. Major Subordinate Command (MSC) Commanders, as well as CMC (C4IA), are authorized to manage COMSEC equipment assets in EKMS accounts of units subordinate to them. They are authorized to manage resources as necessary, to include directing permanent and/or temporary transfer of equipments among and between units subordinate to them, without obtaining permission from NCMS. Temporary transfer (not to exceed eight months) may be accomplished by a local custody SF-153 transfer without notification to, or approval by, higher authority or NCMS. Permanent transfers of equipment may be directed if the transfer does not cause an overage or shortage of the authorized Table of Equipment (T/E) allowance of the commands involved. Permanent transfers must be reported to NCMS on an SF-153 transfer report.

2. DUAL ACCOUNTABILITY OF EQUIPMENT. Within the Marine Corps, COMSEC equipment must be accounted for in both the EKMS and logistics inventory systems. The accounting and reporting requirements of both systems must be met and neither system has precedence, except that issue of cryptographic equipment to LEs will be the responsibility of the EKMS Manager. References (d) and (e) provide policy guidance for the accountability of all Marine Corps ground equipment in the supply system. The EKMS 1A must be used for EKMS accounting purposes.

a. In order to ensure proper accountability in both systems, the EKMS Manager must report all receipts and permanent transfers of cryptographic equipment to the supply officer. Likewise, the supply officer must notify the EKMS Manager and the Communications Officer (CommO) prior to requisitioning any COMSEC equipment or ancillaries and of all shipments processed through the supply system.

NOTE: The EKMS Manager is responsible for ensuring shipment of all COMSEC material is completed per the guidance set forth in the references.

b. Supply records which contain complete inventories of cryptographic equipment are UNCLASSIFIED.

3. EQUIPMENT REPAIR. This section will discuss the procedures for sending CCI equipment to Electronic Maintenance Company (ELMACO), 4th Maintenance Battalion (MaintBn) for repair. The ELMACO repairs only certain types of CCI equipment. Contact the ELMACO prior to entering any Controlled Cryptographic Item (CCI) equipment into the maintenance cycle.

a. A SharePoint™ account is required prior to any unit shipping CCI gear to 4th Maintenance Bn for repair. SharePoint accounts can be obtained by registering at <https://register.marforres.usmc.mil>. All CCI equipment needs to be entered into the Sharepoint Database at the following link:
<https://www2.marforres.usmc.mil/sites/4thmlg/4thmaintbn/mos/Lists/IMA%20Request/Standard.aspx>. If the items are not placed into this database ELMACO will notify the sending unit and have the items entered into the database before accepting the items into the Repairable Issue Point (RIP).

b. Once items are received at ELMACO, the EKMS Manager accepts the gear and processes the SF-153's. At this point, the items are "issued" to the RIP where they are to be inducted into the maintenance cycle. In addition to the required TRANSFER SF 153, one Equipment Repair Order (ERO), one ERO Shopping List (EROSL) (3 copies), and one 1018 inspection tag ("yellow tag") for each item is required with the shipment. If this paperwork is missing or incorrectly filled out it will slow down the process. It is imperative that the sending unit includes a POC and phone number on the ERO in the remarks section. Paper copies of both the ERO and EROSL are required. The Intermediate Maintenance Activity (IMA) facilities do and will continue to require paper copies of all ERO/ERSOLS.

c. All CCI equipment must be shipped via registered mail or FedEx. Certified mail is not an authorized method of shipment.

SECTION 2: INCREASES AND DECREASES OF EQUIPMENT

1. PROCEDURES FOR REQUESTING INCREASES AND DECREASES OF COMSEC EQUIPMENT. When requesting increases and/or decreases of COMSEC equipment, EKMS personnel must work closely with the G-6/S-6, the G-4/S-4 and the Supply Officer to ensure that the requests will not create an imbalance between on-hand quantities and the authorized table of equipment (T/E) allowances. If an account increase or decrease is not within the command's T/E, the Supply Officer must submit a request for modification of allowance through proper Marine Corps channels in accordance with reference (e). Once the T/E has been verified or modified, requests for equipment increases or decreases will be forwarded in accordance with CMC Washington DC message 181000Z JUN 1999 to the appropriate authorities listed below. The format for requesting account increases and decreases is contained in article 672 of EKMS 1A. In addition to the information required by reference (a), the request must also include the name and DSN phone number of the point-of-contact, the unit T/E number, unit Reporting Unit Code (RUC), equipment Table of Allowance Material Control Number (TAMCN), current T/E allowance, and whether

The request is to support the EKMS account command or a LE. If the request is to support a LE, the T/E number, unit RUC and current T/E allowance should be that of the LE command.

a. MARFORRES GROUND UNITS. Requests for COMSEC equipment increases or decreases must be forwarded to COMMARFORRES G-6 with CG MARCORSSYSCOM QUANTICO VA//CINS// as info addressee via the chain of command. Requests from MARFORRES units will not be forwarded directly to CMC, NCMS or CG MARCORSSYSCOM unless directed.

b. MARFORRES AVIATION UNITS

(1) Requests for EKMS account increases and decreases for tactical ground COMSEC equipment such as that used by Marine Air Control Groups and Marine Wing Support Groups, must be submitted and validated via the same chain of command procedures prescribed in paragraph 2201.a, above.

(2) Requests for account increases or decreases of COMSEC equipments which are aircraft inventory items (not part of the command's T/E allowance), must be submitted via message to NCMS WASHINGTON DC. NOTE: MARFORRES Aviation units must conduct an account to account transfer of COMSEC equipment which are aircraft inventory items whenever the aircraft is transferred to another command. Cite this Force Order as authority for such account to account transfers.

2. PROCEDURES FOR REQUESTING INCREASES OR DECREASES OF EQUIPMENT WITH EMBEDDED CRYPTO DEVICES AND ANCILLARY EQUIPMENT

a. All MARFORRES units/commands will use normal supply procedures for requisitioning equipment with embedded CRYPTO devices (i.e., Single Channel Ground and Airborne Radio System Integrated Communications Security Module (SINCGARS-ICOM) with embedded KGV-10 and Position Location Reporting System (PLRS) with embedded KGV-6) and ancillary equipment (HYP-57, HYX-57, Z-AIJ, improved fill cables, etc.)

b. Equipment with embedded COMSEC devices are also subject to T/E allowance limitations. Any request for increase or decrease which is not within the command's T/E allowance must be rectified by a Modification of Allowance. NOTE: For further guidance and instructions for increase and decrease requests refer to CMC WASHINGTON DC message 181000Z JUN 1999.

SECTION 3: MAINTAINING RESERVE ON BOARD (ROB) LEVELS OF KEYING MATERIAL

1. COMSEC KEYING MATERIAL RESERVE-ON-BOARD (ROB)

a. The quantity of future editions of keying material to be held by an EKMS account is determined by CMC or the ISIC.

b. Factors such as operational requirements, type of command (fixed or mobile), location duration and area of deployment for mobile units, and the resource limitations and/or geographical constraints of the DCS are to be considered when establishing a standard ROB level for an account. ROB levels can range from two to seven months of keying material. (Currently MARFORRES EKMS accounts hold two months of ROB.)

2. MAINTAINING ROB LEVELS OF KEYING MATERIAL

a. Each EKMS account command must ensure that all effective and ROB editions of authorized holdings are maintained and requests for increases or decreases are submitted as operational requirements change.

b. It is the responsibility of each EKMS account to review their holdings on an annual basis to ensure a continuing need for the quantity and types of all COMSEC material held.

c. Mobile accounts must keep DCS and COMSEC Material Issuing Office (CMIO) informed of their movements (e.g., deployment schedule) to ensure timely delivery of their ROB material. NOTE: Currently, MARFORRES EKMS accounts do not deploy.

CHAPTER 3

INSPECTIONS, SURVEYS, VISITS, AND SPOT-CHECKS

1. UNANNOUNCED EKMS INSPECTIONS. The ISIC is required to conduct formal inspections of all subordinate EKMS accounts on a biennial basis.

a. Inspections will be conducted by certified inspectors who meet the qualification and training requirements established by references (a) and (b). In order to preclude advance notice of inspections, the inspectors' security clearance will be promulgated by Naval Message to all subordinates on an as needed basis. This information will be retained and filed in the Directives File until superseded.

b. Inspection checklists contained in reference (b) must be used by all MARFORRES units having EKMS accounts as a self-inspection. Annex A of reference (b) is the checklist that will be used by the MARFORRES inspectors for EKMS accounts.

c. Formal inspections will include inspection of EKMS Manager functions, user areas, and LEs. All user areas and LEs will be inspected unless those areas are not geographically collocated with the account.

d. Inspectors are not required to hold a Special Compartmented Information (SCI) access in order to inspect EKMS material and procedures in SCI facilities (SCIF). These facilities must be sanitized to accommodate the inspection. If the nature of the SCIF's operations precludes sanitization, a letter signed by the Commanding Officer, exempting the SCIF from inspection, must be retained on file by the EKMS Manager. A review of the SCIF's operational requirements must be conducted annually, at a minimum, and a new letter issued after each review.

e. Formal inspections will be substantiated by written documentation or visual evidence of compliance with established policies and procedures.

f. Formal inspection reports will evaluate the overall performance of the command as "Satisfactory" or "Unsatisfactory". Common sense and good judgment will be used when evaluating overall performance. A command will be evaluated as "Unsatisfactory" if the command has numerous discrepancies which reflect general, overall non-compliance with established policies and procedures. An account that receives an "Unsatisfactory" finding will be reinspected within 90 days. See reference (b) and (c). The ISIC may require

reinspection of accounts that are deemed to have problems but have not received an "Unsatisfactory" finding.

h. The Commanding Officer, Acting CO, or SCMSRO will be notified of the impending inspection immediately upon arrival of the inspector. An in-brief will be provided, if possible, and a tentative out-brief appointment will be made. Inspectors will provide an out-brief to the CO, Acting CO, or SCMSRO at the conclusion of the inspection. The out-brief will include the inspector's evaluation of the overall performance of the command and discussion of areas of significance.

i. Discrepancies noted during the inspection and corrective measures to eliminate the discrepancies will be discussed with the EKMS Manager at the conclusion of the inspection prior to the out-brief to the CO. Managers will be advised of all discrepancies noted and provided instruction on corrective measures.

j. A formal inspection report will be provided to the inspected command within 45 days of the inspection. Formal inspection reports must be marked FOR OFFICIAL USE ONLY. Formal inspection reports may not be reproduced and distributed outside of the original distribution list without permission of MARFORRES. Reproduction and distribution of the report, in total or in part, for distribution within the inspected command or to LEs is authorized. Formal inspection reports may not be distributed outside of the Marine Corps without approval by CMC (C4IA).

2. PHYSICAL SECURITY EVALUATIONS (PSE) AND PHYSICAL SECURITY SURVEYS (PSS). PSE of areas used for storage of COMSEC material will be conducted every 24 months, at a minimum. PSEs will be conducted in accordance with references (g), thru (i). Requirements for storage of classified material are specified in references (a) and (k), guidance for storage of COMSEC material, to include two person integrity requirements, will be reviewed as part of the survey. Reserve units that are tenants of a Marine Corps installation will contact the Physical Security office to have PSEs conducted on an annual basis in accordance with reference (g).

3. CMS ADVICE AND ASSISTANCE (A&A VISITS). Each EKMS account command must request a CMS A&A visit from the nearest A&A Team at least once every 18 months, (see reference (a) for the location and telephone number of the nearest A&A Team). The primary purpose of CMS A&A visits is to provide training and assistance. A&A Team visits are not inspections. During visits the A&A team members will provide training to manager personnel, users, and LEs on EKMS procedures, security awareness, and the use of LCMS. The A&A Team also provides required training for COs.

a. A&A visits are not automatic or unannounced. Each EKMS account must request a visit.

b. Visits should be scheduled when maximum attendance by alternate managers, users, and LEs can be expected.

c. Sufficient time (minimum of one hour) should be blocked on the CO's calendar to allow for training and a debrief.

d. All discrepancies noted during the A&A visit will be corrected and a Naval Message will be released to the A&A Team, info copy to COMMARFORRES G-6 and CMC Washington DC C4IA, with all corrective actions.

4. EKMS SPOT-CHECKS. COs are responsible for ensuring that quarterly spot-checks are conducted of areas where COMSEC material is used and stored. The CO has the authority to delegate the responsibility of conducting spot-checks. Normally spot-checks of the EKMS Manager's area should be conducted by another senior officer on the staff (i.e., the SCMSRO, the Executive Officer, or the CommO). The EKMS Manager or an alternate manager will be tasked to conduct spot-checks of user and LE's areas. If the LE is not geographically co-located, the LE's Commanding Officer, or Officer-in-Charge, may conduct the spot check and provide the results to the EKMS Manager.

a. A checklist for spot-checks will be used. The Commanding Officer's Handbook provides a sample spot-check list.
NOTE: The CO's Handbook can be found on the MARFORRES Sharepoint web site under HQ G-6 EKMS.

b. Spot-checks must be documented. A copy of the spot-check results must be maintained by the EKMS Manager.

CHAPTER 4

ADMINISTRATION

SECTION 1: EMERGENCY ACTION/DESTRUCTION PLANS

1. REQUIREMENT. In accordance with Annex L of reference (a), every command that holds classified COMSEC or CCI material must prepare an emergency action plan (EAP) and emergency destruction plan (EDP) for safeguarding such material in the event of an emergency.

2. EAP/EDP COMPOSITION. Given the consideration that deploying units usually have no way of knowing what facilities will be available in the deployment area or what type of circumstances may warrant emergency destruction of COMSEC material, the EAP/EDP should be written in generic terms. For example, instead of directing personnel to destroy material by placing it in the burn barrel behind the CO's building, personnel should be directed to destroy material by the most expedient and thorough means available which would render the material unusable by an adversary. The garrison portion of the EAP/EDP will be detailed.

a. The EAP/EDP should be tailored to the command's operational structure. Aviation units, for example, would need an EAP/EDP that provides instructions for destruction of material in aircraft. An infantry battalion would require emergency destruction procedures for their forward elements as well as the rear command post.

b. The EAP/EDP should be broken down to facilitate distribution of procedures to multiple individuals.

c. EAP/EDP procedures must be incorporated in each EKMS account command's training program.

d. Remember an EAP/EDP is not only designed for destruction but is also a key player in emergency activation of deployable units.

SECTION 2: FILES MAINTENANCE

1. GENERAL. EKMS files must be maintained in accordance with procedures prescribed by references (a) and (b). While composition of files allow little flexibility, organization of the files is at the discretion of the manager.

2. HISTORICAL FILES. All MARFORRES EKMS accounts will organize and maintain a historical file. The historical file will be comprised of documentation and information which is of continued value or information to the account.

a. The Historical File must be marked for PERMANENT RETENTION.

b. Prior to the annual retirement of files, EKMS Managers will retrieve all documentation deemed to be of continued value to the account and place documents in the Historical File.

c. The Historical File will be purged on an annual basis and obsolete material removed and filed elsewhere or destroyed, as appropriate.

3. GENERAL MESSAGE FILES. General Messages are those messages which are promulgated to all subordinate commands for general information. All Commands (ALCOM's), All Commands Pacific (ALCOMPAC P's) and All Commands Atlantic (ALCOMLANT A's), All Marines (ALMAR's) etc, are General Messages. As a rule, General Messages are published with sequential numbers which reflect sequence and year of the message. ALCOM 01/07 indicates that the ALCOM is the first ALCOM published in 2007. The majority of EKMS related General Messages will also contain a sequential CMS designator (e.g., CMS 01/07). The CMS designator will not necessarily be in the same sequential order as the General Message. For example, ALCOM 05/07 may contain the designator CMS 01/07. This example indicates that the message was the fifth ALCOM published in 2007, but the first which was related to EKMS.

a. EKMS Managers will ensure that they are on distribution for all General Messages. Although it is not necessary for EKMS accounts to retain all General Messages, the EKMS Manager is responsible for determining which General Messages are pertinent to the account.

b. It is recommended that managers maintain a log of all General Messages received to ensure that all CMS related messages have been retained. General Messages which are not pertinent to the account may be disposed of and the log annotated to reflect that the message was not EKMS related. All general messages must be adhered to and acted upon immediately when directed. NOTE: ALCOM's may be retained electronically, (on CD or Thumb Drive). If retained electronically, a log must be maintained to identify date-time group, originator subject and disposition of the ALCOM.

4. EQUIPMENT MODIFICATION FILES. There are two types of COMSEC equipment modifications, optional and mandatory. A modification may be required for any of a number of reasons, including security and safety. A time compliance date is usually established for installation of mandatory modifications, however some mandatory modifications are not required unless or until the equipment is put on line. EKMS Managers are responsible for ensuring that all

mandatory modifications have been completed prior to placing equipment on line or prior to the mandatory installation date, whichever is directed. EKMS Manager is responsible to ensure that all equipment requiring software upgrades have the most current authorized version.

SECTION 3: DEFINITIONS

1. CMIO. COMSEC Material Issuing Office. The DON's COMSEC material distribution activity. CMIO receives its distribution guidance from NCMS.
2. COMMAND AUTHORITY. Individual responsible for the appointment of user representatives for a department, agency, or organization and assignment of their key ordering privileges.
3. COMMUNICATIONS SECURITY. COMSEC. Protective measures taken to deny unauthorized persons information derived from telecommunications of the U.S. Government concerning national security, and to ensure the authenticity of such telecommunications. COMSEC includes cryptographic security, emission security, transmission security, mission security and physical security of COMSEC material and COMSEC information.
4. COMSEC MATERIAL. Material used to protect U.S. Government transmissions, communications, and the processing of classified or sensitive unclassified information related to national security from unauthorized persons and that material used to ensure the authenticity of such communications. COMSEC material includes, but is not limited to: keying material, equipment, devices, documents, firmware or software that embodies or describes cryptographic logic and other items that perform COMSEC functions.
5. COMSEC MATERIAL CONTROL SYSTEM. CMCS or CMS. A logistics and accounting system through which COMSEC material is distributed, controlled, and safeguarded. The CMCS consists of all COMSEC CORs, crypto logistic depots, and CMS accounts.
6. Defense Courier Service. DCS. DCS is a joint command of the DoD. The DCS provides the principal means for the secure and rapid transportation of DOD and other qualified material requiring controlled handling by courier authorized customers.
7. EKMS ACCOUNT. An activity (identified by a six-digit number) responsible for maintaining custody and control of COMSEC material. The account reports all transactions to the COR.

8. EKMS MANAGER. A qualified person formally designated by an activity to maintain the EKMS account.

9. ALTERNATE EKMS MANAGER. A qualified person formally designated to assist the account CMS/EKMS Manager in account management and to assume the CMS/EKMS Manager's duties in the latter's absence.

10. LOCAL ELEMENT. LE. Individual responsible for maintaining required files and ensuring the proper safeguarding, storage, and usage of COMSEC material issued from an EKMS numbered account or from another Local Element (Issuing).

a. Internal Local Element is an individual or individuals who require COMSEC support from an EKMS numbered account, or from another Local Element (Issuing), and whose CO is the same as the parent account or servicing Local Element (Issuing).

b. External Local Element Individuals who require COMSEC support from an EKMS numbered account, or from another Local Element (Issuing), and whose CO is different from the CO of the parent account or servicing Local Element (Issuing).

c. WITNESS. An individual which assists and validates the preparation of reports and proper COMSEC material handling procedures.