



## DEFENSE SECURITY SERVICE

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QUANTICO, VA 22134-2253

NOV 8 2017

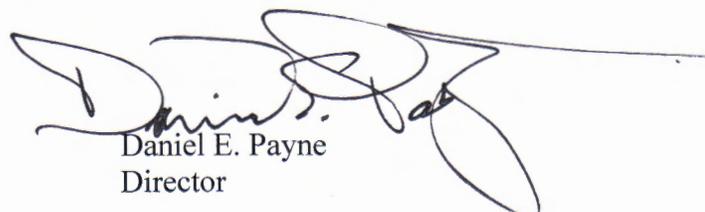
### MEMORANDUM FOR CLEARED COMPANIES OPERATING UNDER FOREIGN OWNERSHIP, CONTROL OR INFLUENCE MITIGATION AGREEMENTS ADMINISTERED BY THE DEFENSE SECURITY SERVICE

Current policy directs that all companies operating under certain foreign ownership, control, or influence (FOCI) mitigation instruments are required to adopt and follow the Defense Security Service Electronic Communications Plan (ECP). Until now, the ECP has included a requirement that cleared and uncleared personnel within the affected companies document telephone interactions with affiliates and provide this documentation to the facility security officer, who reports quarterly to the Government Security Committee that no telephone communications resulted in a disclosure of classified information or in undue influence from the affiliates based on the phone logs. Feedback we have received from company security professionals indicates the phone log requirement is time intensive, costly, and antiquated given current communications technology.

In keeping with our theme of Partnering with Industry, DSS listened to industry's concerns, reviewed the phone log requirements outlined in the ECP, and determined it is in the best interest of both DSS and industry partners to remove the phone log requirement.

To implement this change, DSS removed phone log requirements from the ECP template. Effective immediately, companies implementing new ECPs will no longer be required to complete phone logs. For those companies operating under previously approved ECPs, DSS will no longer review or enforce phone log requirements as part of its assessments. As stated in the visitation section of Security Control Agreements, Special Security Agreements, and Proxy Agreements, certain video teleconferences (VTCs) may be treated as visits at the discretion of the Government Security Committee. Companies approved to treat VTCs as phone calls will continue documenting these interactions as they do today. For those companies treating VTCs as visits, there will be no change to current approved procedures. Phone log requirements will be formally removed from legacy ECPs upon a company's next change to the ECP requiring DSS approval or at the time of mitigation agreement renewal.

In the meantime, this memorandum serves as official cancellation of the phone log requirements as outlined above, and may be used as a reference during your company's next scheduled security vulnerability assessment. Please forward any questions or concerns to [dss.quantico.dss-hq.mbx.foci-hq@mail.mil](mailto:dss.quantico.dss-hq.mbx.foci-hq@mail.mil).



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