

## (no subject)

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Hev all.

Comments below in-line in red....

Thanks!

Morgan

On Mon, Jun 3, 2024 at 10:59AM Eamon McCormick <emccormi@redhat.com> wrote: | Morgan,

We need your help and approval to make some changes to the ROSA GovCloud/FedRAMP customer onboarding process. In short, it's become a customer impediment and we risk losi b/c of some of the information we require. If you have concerns about any of the changes proposed below, let's quickly have a call to discuss.

We currently require all new ROSA GovCloud customers to fill out the following fields in the ROSA FedRAMP Access Form:

- Requestor is U.S. Person as defined by the International Traffic in Arms Regulations, 22 CFR 120.62.
- Requestor will use the service to support a U.S. government contract and/or grant.
- ☐ Requestor will only authorize U.S. Persons to manage and access root account keys to the service.

Contract ID, Award ID or RFP Number from the U.S. Spending government website.

Please download the FedRAMP Rules of Behavior document. Read the document and attest to the requirements by signing and uploading it to the de-

Drag and drop a file or upload one

Submit

We've heard from a handful of NAPS customers (most recently Collins Aerospace) that the language around supporting government customers and the hard requirement for a Contract ID is FedRAMPed services and to AWS GovCloud itself. It appears that this step has evolved from a mild inconvenience to a legitimate impediment for continued growth and adoption of the prod functional team supporting ROSA GovCloud is to continue to meet all required controls while streamlining the customer onboarding process as much as possible.

## Proposed changes:

- 1. Remove the download/sign/upload step for the FedRAMP Rules of Behavior document, and (optionally) replace it with an attestation checkbox instead. All government agencies a have this, and the validation we perform here is duplicative with other attestations.
- A clickthrough/"attestation checkbox" here is fine
  - 1. Change the second checkbox to read: "Requestor is a US entity incorporated to do business in the United States and is based on US soil."
- What is driving this? The definition in 22 CFR 120.62 is the standard for assessing whether a person or entity is a "US person." It is technically different from what the proposed language is called a "US Person" and not "US Entity"? The definition of US Persons in this regulation includes US entities, however, if there is some confusion because people don't realize that, language.
  - Make the Contract ID field optional, and remove the requirement for validation against https://usaspending.gov (local government contracts are also valid)
    Another option is to say "If the contract is not numbered, specify 'N/A'" like AWS does:
- · I'm OK doing something that mirrors the concept AWS has below.

[Quoted text hidden]