

# What is the process to use previously-deployed POI devices in a PCI P2PE Solution?

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(Note the term "solution provider" below can be used interchangeably with "component provider," depending on the entity managing the POI devices.)

Please refer to the latest P2PE glossary for definitions of terms used in this FAQ.

This FAQ provides guidance concerning previously-deployed POI devices that can be followed by a P2PE solution provider and a P2PE Assessor as a means to help meet the applicable PCI P2PE requirements.

The P2PE standard contains various requirements regarding the establishment and enablement of POI devices in merchant locations for use in a validated P2PE solution. If these requirements are not specifically adhered to, it may be difficult or impossible for a P2PE Assessor to verify the applicable requirements in P2PE Domains 1, 2, and 5 have been satisfied, especially when the POI devices were deployed either without knowledge of the requirements and/or prior to a P2PE assessment. POI devices already deployed as part of a PCI-listed P2PE v2 solution that are being assessed to the current P2PE Standard should still adhere to this guidance, though, the effort and/or concern is likely minimal.

P2PE solution providers should engage a P2PE Assessor as soon as possible to assess the status of the previously-deployed POI devices. The P2PE Assessor can assess the solution provider's documented processes for POI deployment and note any potential deficiencies requiring remediation.

The following table depicts various scenarios and associated guidance for both a P2PE solution provider and a P2PE Assessor.

"NOTE: It is acceptable for the POI devices to retain the necessary keying material to facilitate remote loading (including firmware loading and remote key injection.) If, however, there is any indication there has been a compromise of these keys or the firmware itself, the POI devices must be sent back for re-initialization."

## SCENARIO

### PROCESS

#### NEW P2PE ASSESSMENTS

A P2PE Assessor has been engaged to perform an initial assessment of a solution provider's new P2PE solution. There are POI device type(s) that need to be assessed that have already been deployed to merchant locations.

The P2PE solution provider engages a P2PE Assessor to assess their solution as required by the PCI P2PE Standard and Program Guide.

- If the P2PE Assessor determines the applicable P2PE requirements regarding the previously-deployed POI devices have been satisfied, the P2PE Assessor will document the P-ROV accordingly, which per the P2PE Program Guide, can be submitted to the PCI Council upon completion of a successful P2PE assessment.

- If the solution provider lacks sufficient evidence to verify the applicable P2PE requirements have been satisfied (as determined by a P2PE Assessor during the course of a P2PE assessment), then all firmware, cryptographic keysNOTE, configurations, and software must be reloaded into the POI devices in accordance with applicable P2PE requirements. At this point, the P2PE Assessor can reassess the applicable requirements.

#### ADDING A NEW MERCHANT WITH THE SAME POI DEVICE TYPES TO A PCI-LISTED SOLUTION

A solution provider with a PCI-listed P2PE solution wants to add a merchant that has already deployed POI devices of the same POI device type as those approved for use in their P2PE solution (as shown as device dependencies on the P2PE approval listing).

The P2PE solution provider follows their documented processes that were assessed previously as part of their P2PE solution assessment.

- If the applicable P2PE requirements regarding the previously-deployed POI devices have been satisfied, the results must be documented by the solution provider and retained for future review.
- If the solution provider lacks sufficient evidence to verify the applicable P2PE requirements have been satisfied, then all firmware, cryptographic keysNOTE, configurations, and software must be reloaded into the POI devices in accordance with applicable P2PE requirements.

#### ADDING A NEW MERCHANT WITH DIFFERENT POI DEVICE TYPES TO A PCI-LISTED SOLUTION

A solution provider with a PCI-listed P2PE solution wants to add a merchant that has already deployed POI devices of a different POI device type as those approved for use in their P2PE solution.

- The solution provider must engage a P2PE Assessor. The P2PE Assessor must follow the P2PE Program Guide Change process to add the new POI device type(s) to the associated PCI P2PE listing.
- The P2PE solution provider follows their documented processes that were assessed previously as part of their P2PE solution assessment.
- If the applicable P2PE requirements regarding the previously-deployed POI devices have been satisfied, the results must be documented by the solution provider and retained for future review.
- If the solution provider lacks sufficient evidence to verify the applicable P2PE requirements have been satisfied, then all firmware, cryptographic keysNOTE, configurations, and software must be reloaded into the POI devices in accordance with applicable P2PE requirements.