



## American National Standard for Financial Services

### ANSI X9.124-2-2018

# Symmetric Key Cryptography For the Financial Services Industry — Format Preserving Encryption- Part 2: Key Stream with Counter Mode



Accredited Standards Committee X9, Incorporated  
Financial Industry Standards

**Date Approved: February 14, 2018**

American National Standards Institute

American National Standards, Technical Reports and Guides developed through the Accredited Standards Committee X9, Inc., are copyrighted. Copying these documents for personal or commercial use outside X9 membership agreements is prohibited without express written permission of the Accredited Standards Committee X9, Inc. For additional information please contact ASC X9, Inc., 275 West Street, Suite 107, Annapolis, MD 21401.

**This page left intentionally blank**

<b>Contents</b>	<b>Page</b>
<b>Foreword</b> .....	<b>iv</b>
<b>Introduction</b> .....	<b>v</b>
<b>1 Scope</b> .....	<b>1</b>
<b>2 Normative references</b> .....	<b>1</b>
<b>3 Terms and definitions</b> .....	<b>1</b>
<b>4 Format Preserving Encryption – General</b> .....	<b>3</b>
<b>4.1 Format Preserving Encryption – Counter Mode</b> .....	<b>4</b>
<b>4.2 Protocol Security Considerations</b> .....	<b>5</b>
<b>4.3 Key Management</b> .....	<b>6</b>
<b>4.3.1 DUKPT key management</b> .....	<b>6</b>
<b>4.3.2 Derived fixed key with counter management</b> .....	<b>6</b>
<b>4.3.3 Allocating Device IDs</b> .....	<b>7</b>
<b>4.3.4 Choosing Initial Counter Values</b> .....	<b>8</b>
<b>Annex A (normative) Description of FPCM</b> .....	<b>8</b>
<b>Annex B (normative) Test Vectors</b> .....	<b>11</b>

## **ANSI X9.124-2-2018**

### **Foreword**

Approval of an American National Standard requires verification by ANSI that the requirements for due process, consensus, and other criteria for approval have been met by the standards developer.

Consensus is established when, in the judgment of the ANSI Board of Standards Review, substantial agreement has been reached by directly and materially affected interests. Substantial agreement means much more than a simple majority, but not necessarily unanimity. Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution.

The use of American National Standards is completely voluntary; their existence does not in any respect preclude anyone, whether he has approved the standards or not from manufacturing, marketing, purchasing, or using products, processes, or procedures not conforming to the standards.

The American National Standards Institute does not develop standards and will in no circumstances give an interpretation of any American National Standard. Moreover, no person shall have the right or authority to issue an interpretation of an American National Standard in the name of the American National Standards Institute. Requests for interpretation should be addressed to the secretariat or sponsor whose name appears on the title page of this standard.

**CAUTION NOTICE:** This American National Standard may be revised or withdrawn at any time. The procedures of the American National Standards Institute require that action be taken to reaffirm, revise, or withdraw this standard no later than five years from the date of approval.

Published by

Accredited Standards Committee X9, Incorporated  
Financial Industry Standards  
275 West Street, Suite 107  
Annapolis, MD 21401 USA  
X9 Online <http://www.x9.org>

Copyright © 2018 ASC X9, Inc.

All rights reserved.

No part of this publication may be reproduced in any form, in an electronic retrieval system or otherwise, without prior written permission of the publisher. Published in the United States of America.

## Introduction

NOTE The user's attention is called to the possibility that compliance with this standard may require use of an invention covered by patent rights.

By publication of this standard, no position is taken with respect to the validity of this claim or of any patent rights in connection therewith. The patent holder has, however, filed a statement of willingness to grant a license under these rights on reasonable and nondiscriminatory terms and conditions to applicants desiring to obtain such a license. Details may be obtained from the standards developer.

Suggestions for the improvement or revision of this Standard are welcome. They should be sent to the X9 Committee Secretariat, Accredited Standards Committee X9, Inc., Financial Industry Standards, 275 West Street, Suite 107, Annapolis, MD 21401 USA.

This Standard was processed and approved for submittal to ANSI by the Accredited Standards Committee on Financial Services, X9. Committee approval of the Standard does not necessarily imply that all the committee members voted for its approval.

At the time this standard was approved, the X9 committee had the following members:

Roy DeCicco, X9 Chair  
Angela Hendershott, X9 Vice-Chair  
Steve Stevens, Executive Director  
Janet Busch, Program Manager

<i>Organization Represented</i>	<i>Representative</i>
ACI Worldwide .....	Doug Grote
American Bankers Association .....	Diane Poole
American Express Company .....	David Moore
Bank of America .....	Daniel Welch
Bank of New York Mellon .....	Arthur Sutton
Blackhawk Network .....	Anthony Redondo
Bloomberg LP .....	Corby Dear
Capital One .....	Marie LaQuerre
Citigroup, Inc. ....	Karla McKenna
CLS Bank .....	Ram Komarraju
Conexus, Inc. ....	Gray Taylor
CUSIP Service Bureau .....	Gerard Faulkner
Delap LLP .....	Andrea Beatty
Delap LLP .....	Darlene Kargel
Deluxe Corporation .....	Angela Hendershott
Diebold Nixdorf .....	Bruce Chapa
Discover Financial Services .....	Michelle Zhang
Dover Fueling Solutions .....	Bradford Loewy
eCurrency .....	David Wen
Federal Reserve Bank .....	Mary Hughes
First Data Corporation .....	Lisa Curry
FIS .....	Stephen Gibson-Saxty

**ANSI X9.124-2-2018**

Fiserv .....	Dan Otten
FIX Protocol Ltd - FPL.....	Jim Northey
Futurex.....	Ryan Smith
Gilbarco.....	Bruce Welch
Harland Clarke .....	John McCleary
IBM Corporation .....	Todd Arnold
Ingenico .....	Rob Martin
ISARA Corporation.....	Alexander Truskovsky
ISITC.....	Lisa Iagatta
ITS, Inc. (SHAZAM Networks) .....	Manish Nathwani
J.P. Morgan Chase .....	Roy DeCicco
MagTek, Inc. ....	Mimi Hart
MasterCard Europe Sprl .....	Mark Kamers
NACHA The Electronic Payments Association .....	Priscilla Holland
National Security Agency .....	Paul Timmel
Nautilus Hyosung.....	Joe Militello
NCR Corporation .....	David Norris
Office of Financial Research, U.S. Treasury Department .....	Thomas Brown Jr.
PCI Security Standards Council .....	Troy Leach
RouteOne.....	Chris Irving
RouteOne.....	Jenna Wolfe
SWIFT/Pan Americas.....	Karin DeRidder
SWIFT/Pan Americas.....	Frank Vandriessche
Symcor Inc. ....	Debbi Fitzpatrick
TECSEC Incorporated .....	Ed Scheidt
The Clearing House .....	Sharon Jablon
U.S. Bank.....	John King
U.S. Commodity Futures Trading Commission (CFTC) .....	Robert Stowsky
USDA Food and Nutrition Service.....	Kathy Ottobre
Vantiv LLC .....	John Hall
VeriFone, Inc.....	Dave Faoro
Viewpointe .....	Richard Luchak
VISA.....	Kim Wagner
Wells Fargo Bank.....	Mark Schaffer

At the time this standard was approved, the X9F subcommittee on Data and Information Security had the following members:

Dave Faoro, Chairman  
 Steven Bowles, Vice Chairman

<i>Organization Represented</i>	<i>Representative</i>
ACI Worldwide .....	Doug Grote
ACI Worldwide .....	Dan Kinney
ACI Worldwide .....	Julie Samson
American Bankers Association .....	Tom Judd
American Express Company .....	Gail Chapman
American Express Company .....	Farid Hatefi
American Express Company .....	David Moore
American Express Company .....	John Timar
American Express Company .....	Kevin Welsh
Bank of America .....	Amanda Adams
Bank of America .....	Peter Capraro
Bank of America .....	Andi Coleman
Bank of America .....	Lawrence LaBella
Bank of America .....	Will Robinson
Bank of America .....	Michael Smith
Bank of America .....	Daniel Welch
BlackBerry Limited .....	Daniel Brown
Blackhawk Network .....	Vijay Bolina
Blackhawk Network .....	Anthony Redondo
Bloomberg LP .....	Erik Anderson
Bloomberg LP .....	Corby Dear
Capital One .....	Marie LaQuerre
Capital One .....	Johnny Lee
Cipherithm .....	Scott Spiker
comForte 21 GmbH .....	Thomas Gloerfeld
comForte 21 GmbH .....	Henning Horst
Communications Security Establishment .....	Jonathan Hammell
Communications Security Establishment .....	David Smith
Conexus, Inc. ....	Alan Thiemann
CUSIP Service Bureau .....	Scott Preiss
Delap LLP .....	Andrea Beatty
Delap LLP .....	David Buchanan
Delap LLP .....	Darlene Kargel
Deluxe Corporation .....	Angela Hendershott
Deluxe Corporation .....	Margiore Romay
Deluxe Corporation .....	Andy Vo
Diebold Nixdorf .....	Christoph Bruecher
Diebold Nixdorf .....	Andrea Carozzi

**ANSI X9.124-2-2018**

Diebold Nixdorf .....	Bruce Chapa
Diebold Nixdorf .....	Michael Nolte
Diebold Nixdorf .....	Michael Ott
Diebold Nixdorf .....	Dave Phister
Digicert.....	Tim Hollebeek
Discover Financial Services .....	Cheryl Mish
Discover Financial Services .....	Diana Pauliks
Discover Financial Services .....	Jordan Schaefer
Dover Fueling Solutions .....	Steven Bowles
Dover Fueling Solutions .....	Bradford Loewy
eCurrency .....	David Wen
Federal Reserve Bank .....	Patrick Adler
Federal Reserve Bank .....	Guy Berg
Federal Reserve Bank .....	Marianne Crowe
Federal Reserve Bank .....	Amanda Dorphy
Federal Reserve Bank .....	Mary Hughes
Federal Reserve Bank .....	Heather Hultquist
Federal Reserve Bank .....	Janet LaFrence
Federal Reserve Bank .....	Susan Pandy
Federal Reserve Bank .....	Patti Ritter
First Data Corporation.....	Lisa Curry
First Data Corporation.....	Kalli Davidson
First National Bank of Omaha .....	Sherry Rewolinski
First National Bank of Omaha .....	Kristi White
FIS .....	Saman Amighi
FIS .....	John Soares
FIS .....	Sunny Wear
Fiserv .....	Bud Beattie
Fiserv .....	Dan Otten
Futurex.....	Ryan Smith
Futurex.....	Tim Weston
GEOBRIDGE Corporation.....	Donna Gem
GEOBRIDGE Corporation.....	Jason Way
Gilbarco.....	Scott Turner
Gilbarco.....	Bruce Welch
Harland Clarke .....	Joseph Filer
Heartland Payment Systems.....	Scott Meeker
IBM Corporation .....	Todd Arnold
IBM Corporation .....	Richard Kisley
Ingenico .....	Nabil Hamzi
Ingenico .....	Rob Martin
ISARA Corporation.....	Mike Brown
ISARA Corporation.....	Philip Lafrance
ISARA Corporation.....	Alexander Truskovsky
ITS, Inc. (SHAZAM Networks) .....	Manish Nathwani
J.P. Morgan Chase .....	Kathleen Krupa



J.P. Morgan Chase .....	Jackie Pagán
J.P. Morgan Chase .....	Darryl Scott
K3DES LLC .....	Azie Amini
MagTek, Inc. ....	Jeff Duncan
MagTek, Inc. ....	Mimi Hart
MasterCard Europe Sprl .....	Mark Kamers
MasterCard Europe Sprl .....	Joshua Knopp
MasterCard Europe Sprl .....	Larry Newell
MasterCard Europe Sprl .....	Adam Sommer
MasterCard Europe Sprl .....	Michael Ward
Micro Focus .....	Luther Martin
National Institute of Standards and Technology (NIST) .....	Elaine Barker
National Institute of Standards and Technology (NIST) .....	Lily Chen
National Security Agency .....	Mike Boyle
National Security Agency .....	Paul Timmel
Nautilus Hyosung .....	Joe Militello
Nautilus Hyosung .....	Jay Shin
NCR Corporation .....	Tanika Eng
NCR Corporation .....	Charlie Harrow
NCR Corporation .....	David Norris
Onboard Security .....	Mark Etzel
Onboard Security .....	Virendra Kumar
Onboard Security .....	William Whyte
Onboard Security .....	Lee Wilson
Onboard Security .....	Zhenfei Zhang
PCI Security Standards Council .....	Leon Fell
PCI Security Standards Council .....	Troy Leach
PCI Security Standards Council .....	Ralph Poore
RSA, The Security Division of EMC .....	Steve Schmalz
SafeNet Infotech Pvt. Ltd. ....	Amit Sinha
SafeNet Infotech Pvt. Ltd. ....	Devesh Tewari
Safeway .....	Gary Zempich
TECSEC Incorporated .....	Ed Scheidt
TECSEC Incorporated .....	Dr. Wai Tsang
TECSEC Incorporated .....	Jay Wack
Thales UK Limited .....	Larry Hines
Thales UK Limited .....	James Torjussen
The Clearing House .....	Mark Fitlin
The Clearing House .....	Sharon Jablon
The Clearing House .....	Hirak Patel
The Clearing House .....	Miguel Sanchez
Trustwave .....	John Amaral
U.S. Bank .....	Stephen Case
U.S. Bank .....	Peter Skirvin
Vantiv LLC .....	John Hall
Vantiv LLC .....	Jeffrey Singleton

**ANSI X9.124-2-2018**

Vantiv LLC .....	Bill Weingart
VeriFone, Inc.....	John Barrowman
VeriFone, Inc.....	David Ezell
VeriFone, Inc.....	Dave Faoro
VeriFone, Inc.....	Doug Manchester
VeriFone, Inc.....	Brad McGuinness
VeriFone, Inc.....	Saxon Noh
VeriFone, Inc.....	Joachim Vance
VISA.....	Shahzad Khan
VISA.....	Eric Le Saint
VISA.....	Kim Wagner
Wells Fargo Bank.....	Allen Ausec
Wells Fargo Bank.....	David Cooper
Wells Fargo Bank.....	William Felts, IV
Wells Fargo Bank.....	Matthew Greenwell
Wells Fargo Bank.....	Phillip Griffin
Wells Fargo Bank.....	Jan Kohl
Wells Fargo Bank.....	Garrett Macey
Wells Fargo Bank.....	Kelly O'Donnell
Wells Fargo Bank.....	Mark Schaffer
Wells Fargo Bank.....	Maria Schuett
Wells Fargo Bank.....	Jeff Stapleton
White and Williams LLP .....	Emma Bechara
White and Williams LLP .....	Richard Borden
White and Williams LLP .....	Joshua Mooney
White and Williams LLP .....	Laura Schmidt
White and Williams LLP .....	Kate Woods
XYPRO Technology.....	Steve Tcherchian

Under ASC X9, Inc. procedures, a working group may be established to address specific segments of work under the ASC X9 Committee or one of its subcommittees. A working group exists only to develop standard(s) or guideline(s) in a specific area and is then disbanded. The individual experts are listed with their affiliated organizations. However, this does not imply that the organization has approved the content of the standard or guideline. (Note: Per X9 policy, company names of non-member participants are listed only if, at the time of publication, the X9 Secretariat received an original signed release permitting such company names to appear in print.)

At the time this standard was approved, the X9F1 Cryptographic Tools group which developed this standard had the following active members:

Eric LeSaint, Chairman and Kim Wagner, Project Editor

<i>Organization Represented</i>	<i>Representative</i>
American Bankers Association .....	Tom Judd
American Express Company.....	Gail Chapman

American Express Company .....	Jonathan Gwynn
American Express Company .....	David Moore
Atlantic BT .....	Ulf Mattsson
Bank of America .....	Amanda Adams
Bank of America .....	Peter Capraro
Bank of America .....	Andi Coleman
Bank of America .....	Lawrence LaBella
Bank of America .....	Daniel Welch
BlackBerry Limited.....	Daniel Brown
BlackBerry Limited.....	John O. Goyo
Capital One.....	Johnny Lee
Cipherithm .....	Scott Spiker
comForte 21 GmbH .....	Henning Horst
Communications Security Establishment.....	Jonathan Hammell
Communications Security Establishment.....	David Smith
Delap LLP .....	Darlene Kargel
Diebold Nixdorf .....	Christoph Bruecher
Diebold Nixdorf .....	Rick Brunt
Diebold Nixdorf .....	Andrea Carozzi
Diebold Nixdorf .....	Bruce Chapa
Diebold Nixdorf .....	Scott Harroff
Diebold Nixdorf .....	Anne Konecny
Diebold Nixdorf .....	Michael Nolte
Diebold Nixdorf .....	Dave Phister
Diebold Nixdorf .....	Robert Simon
Digicert .....	Tim Hollebeek
Discover Financial Services.....	Cheryl Mish
Discover Financial Services.....	Diana Pauliks
Discover Financial Services.....	Lakshmi Ramanathan
Discover Financial Services.....	Michelle Zhang
Dover Fueling Solutions.....	Steven Bowles
Dover Fueling Solutions.....	Bradford Loewy
Federal Reserve Bank .....	Patrick Adler
Federal Reserve Bank .....	Guy Berg
Federal Reserve Bank .....	Pieralberto Deganello
Federal Reserve Bank .....	Amanda Dorphy
Federal Reserve Bank .....	Mary Hughes
Federal Reserve Bank .....	Heather Hultquist
Federal Reserve Bank .....	Janet LaFrence
Federal Reserve Bank .....	Paul Nunnally
Federal Reserve Bank .....	John Rhodes
Federal Reserve Bank .....	Patti Ritter
Federal Reserve Bank .....	Charles Tsai
Fiserv .....	Bud Beattie
Fiserv .....	Dan Otten
GEOBRIDGE Corporation .....	Jason Way

**ANSI X9.124-2-2018**

Gilbarco.....	Bruce Welch
Harland Clarke .....	John McCleary
IBM Corporation .....	Todd Arnold
IBM Corporation .....	Richard Kisley
Ingenico .....	Eric Brier
Ingenico .....	Nabil Hamzi
Ingenico .....	Rob Martin
ISARA Corporation.....	Mike Brown
ISARA Corporation.....	Philip Lafrance
ISARA Corporation.....	Alexander Truskovsky
MasterCard Europe Sprl .....	Michael Ward
Micro Focus .....	Susan Langford
Micro Focus .....	Luther Martin
National Institute of Standards and Technology (NIST) .....	Elaine Barker
National Institute of Standards and Technology (NIST) .....	Lawrence Bassham III
National Institute of Standards and Technology (NIST) .....	Lily Chen
National Institute of Standards and Technology (NIST) .....	Morris Dworkin
National Institute of Standards and Technology (NIST) .....	Randall Easter
National Institute of Standards and Technology (NIST) .....	Sharon Keller
National Institute of Standards and Technology (NIST) .....	John Kelsey
National Security Agency .....	Mary Baish
National Security Agency .....	Mike Boyle
National Security Agency .....	Nick Gajcowski
National Security Agency .....	Paul Timmel
National Security Agency .....	Debby Wallner
NCR Corporation .....	Rick Fender
NCR Corporation .....	Charlie Harrow
NCR Corporation .....	Brian Wotherspoon
Onboard Security .....	William Whyte
PCI Security Standards Council .....	Troy Leach
PCI Security Standards Council .....	Ralph Poore
Richard Sweeney .....	Richard Sweeney
RSA, The Security Division of EMC .....	Steve Schmalz
RSA, The Security Division of EMC .....	Ross Urban
SafeNet Infotech Pvt. Ltd. ....	Amit Sinha
TECSEC Incorporated .....	Ed Scheidt
TECSEC Incorporated .....	Dr. Wai Tsang
TECSEC Incorporated .....	Jay Wack
Thales UK Limited.....	Colette Broadway
Thales UK Limited.....	James Torjussen
U.S. Bank.....	Peter Skirvin
Vantiv LLC .....	John Hall
VeriFone, Inc.....	Dave Faoro
VeriFone, Inc.....	LeAnn Hostetler
VeriFone, Inc.....	Chris Madden
VeriFone, Inc.....	Doug Manchester

VeriFone, Inc. ....	Joachim Vance
VISA .....	Hap Huynh
VISA .....	Shahzad Khan
VISA .....	Eric Le Saint
VISA .....	Johan ("Hans") Van Tilburg
VISA .....	Kim Wagner
Wells Fargo Bank .....	Sotos Barkas
Wells Fargo Bank .....	William Felts, IV
Wells Fargo Bank .....	Matthew Greenwell
Wells Fargo Bank .....	Phillip Griffin
Wells Fargo Bank .....	Jeff Jacoby
Wells Fargo Bank .....	Brian Keltner
Wells Fargo Bank .....	Jan Kohl
Wells Fargo Bank .....	Eric Lengvenis
Wells Fargo Bank .....	Doug Pelton
Wells Fargo Bank .....	Jeff Stapleton
Wells Fargo Bank .....	Tony Stieber

This is a preview of "ANSI X9.124-2-2018". [Click here to purchase the full version from the ANSI store.](#)

# Symmetric Key Cryptography for the Financial Services Industry — Format Preserving Encryption — Part 2: Counter Mode

## 1 Scope

This document defines requirements for Format Preserving Encryption - Counter Mode (FPCM). FPCM methods encrypt data strings of a specific length and character set into ciphertext of the same length using the same character set and using the equivalent of Counter Mode (CTR) defined in NIST SP38B. Format Preserving Encryption is useful in situations where fixed-format data, such as Primary Account Numbers (PANs) or Social Security Numbers, must be encrypted, but there is a requirement to limit changes to existing communication protocols, database schemata or application code. FPCM is a particularly simple and efficient mechanism to achieve format preserving encryption, which shares many of the strengths and challenges of CTR.

## 2 Normative references

The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

X9 SD-34, *Registry of Approved Cryptographic Resources for Financial Services Industry Standards*, Registry Item 00002, *Advanced Encryption Standard*

## 3 Terms and definitions

For the purposes of this document, the following terms and definitions apply.

### **AES**

The Advanced Encryption Standard, a block cipher with a 128-bit wide block and either a 128-bit or 256-bit key.

### **alphabet**

A finite nonempty set.

### **block**

A block is a fixed-length sequence of binary bits.