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Recommendation for the Entropy Sources Used for Random Bit Generation

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Abstract

This Recommendation specifies the design principles and requirements for the entropy sources used by Random Bit Generators, and the tests for the validation of entropy sources. These entropy sources are intended to be combined with Deterministic Random Bit Generator mechanisms that are specified in [SP 800-90A] to construct Random Bit Generators, as specified in [SP 800-90C].

KEY WORDS: deterministic random bit generator (DRBG); entropy; hash function; random number generator; noise source; entropy source; conditioning component

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Authority

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Conformance testing for implementations of this Recommendation will be conducted within the framework of the Cryptographic Algorithm Validation Program (CAVP) and the Cryptographic Module Validation Program (CMVP). The requirements of this Recommendation are indicated by the word "shall." Some of these requirements may be out-of-scope for CAVP or CMVP validation testing, and thus are the responsibility of entities using, implementing, installing or configuring applications that incorporate this Recommendation.

Recommendation for the Entropy Sources Used for Random Bit Generation

1.0 Scope

Cryptography and security applications make extensive use of random numbers and random bits. However, the generation of random bits is problematic in many practical applications of cryptography. The purpose of NIST Special Publication (SP) 800-90B is to specify the design and testing requirements for entropy sources that can be validated as **approved** entropy sources by NIST's CAVP and CMVP. SPs 800-90A and 800-90C address the construction of **approved** Deterministic Random Bit Generator (DRBG) mechanisms and **approved** Random Bit Generators (RBGs) that utilize the entropy sources and DRBG mechanisms, respectively.

An entropy source that conforms to this Recommendation generates random bits, primarily for use in cryptographic applications. While there has been extensive research on the subject of generating pseudorandom bits using a DRBG and an unknown seed value, creating such an unknown value has not been as well documented. The only way for this seed value to provide real security is for it to contain a sufficient amount of randomness, i.e., from a non-deterministic process referred to as an entropy source. SP 800-90B describes the properties that an entropy source must have to make it suitable for use by cryptographic random bit generators, as well as the tests used to validate the quality of the entropy source.

The development of entropy sources that provide unpredictable output is difficult, and providing guidance for their design and validation testing is even more so. The testing approach defined in this Recommendation assumes that the developer understands the behavior of the entropy source and has made a good-faith effort to produce a consistent source of entropy. It is expected that, over time, improvements to the guidance and testing will be made, based on experience in using and validating against this Recommendation.

SP 800-90B is based on American National Standard (ANS) X9.82, Part 2, Random Number Generation, Part 2: Entropy Sources [X9.82-2].

2.0 Terms and Definitions

Algorithm

A clearly specified mathematical process for computation; a set of rules that, if followed, will give a prescribed result.

Approved

FIPS-approved or NIST-recommended.

Assessment (of Entropy)

An evaluation of the amount of entropy provided by a (digitized) noise source and/or the entropy source that employs it.

Biased

A random process (or the output produced by such a process) is said to be biased with respect to an assumed discrete set of potential outcomes (i.e., possible output values) if some of those outcomes have a greater probability of occurring than do others. Contrast with unbiased.

Binary Data (from a Noise Source)

Digitized output from a noise source that consists of a single bit; that is, each sampled output value is represented as either 0 or 1.

Bitstring

A bitstring is a finite sequence (string) of 0's and 1's. The left-most bit is the most significant bit in the bitstring. The right-most bit is the least significant bit of the bitstring.

Collision

An instance of duplicate sample values occurring in a dataset.

Conditioning (of Noise Source Output)

A method of post-processing the output of a (digitized) noise source to reduce bias and/or ensure that the entropy rate of the conditioned output is no less than some specified amount. Full entropy output is not necessarily provided.

Conditioning Component

An optional component of an entropy source used to post-process the output of its noise source with the intent of reducing bias and/or increasing the entropy rate of the resulting output to ensure that it meets some specific threshold. (See Conditioning, above.)

Continuous Test

A health test performed within an entropy source on the output of its noise source, in order to gain some level of assurance that the noise source is working correctly, prior to producing each output from the entropy source.

Consuming Application (for an RBG)

An application that uses the output from an **approved** random bit generator.

Cryptographic Hash Function

A function that maps bitstrings of arbitrary length (up to some maximum) to bitstrings of fixed length (determined by the particular function) and is expected to have, at least, the following three properties:

- 1. Collision resistance: It is computationally infeasible to find two distinct input bitstrings that map to the same output bitstring;
- 2. Preimage resistance: Given a bitstring of the same length as those output by the function (but not previously observed as the output corresponding to a known input), it is computationally infeasible to find an input bitstring that maps to the given bitstring;
- 3. Second-preimage resistance: Given one input bitstring (and the corresponding bitstring output by the function), it is computationally infeasible to find a second (distinct) input bitstring that maps to the same output bitstring.

Dataset

A sequence of sample values. (See Sample.)

Deterministic Random Bit Generator (DRBG)

An RBG that employs a DRBG mechanism and a source of entropy input. A DRBG produces a pseudorandom sequence of bits from an initial secret value called a seed (and, perhaps additional input). A DRBG is often called a Pseudorandom Bit (or Number) Generator.

DRBG mechanism

The portion of an RBG that includes the functions necessary to instantiate and uninstantiate a DRBG, generate pseudorandom bits, (optionally) reseed the DRBG and test the health of the DRBG mechanism. **Approved** DRBG mechanisms are specified in [SP 800-90A].

Entropy

The (Shannon) entropy of a discrete random variable X is the expected amount of information that will be provided by an observation of X. (See information content.) In this Standard, the information content is measured in bits; when the expected information content of an observation of X is m bits, we say that the random variable X has m bits of entropy.

Entropy is defined relative to one's knowledge of (the probability distribution on) X prior to an observation, and reflects the uncertainty associated with predicting its value – the larger the entropy, the greater the uncertainty in predicting the value of an observation.

In the case of a discrete random variable, the entropy of X is determined by computing the sum of $-p(x)\log_2(p(x))$, where x varies over all possible values for an observation of X and p(x) is the (a priori) probability that an observation will have value x.

If there are N distinct possibilities for an observation of X, then the maximum possible value for the entropy of X is $\log_2(N)$ bits, which is attained when X has the uniform probability distribution (i.e., when the N possible observations are equally likely to occur). See also min-entropy.

Entropy Rate

The rate at which a digitized noise source (or entropy source) provides entropy; it is computed as the assessed amount of entropy provided by a bitstring output from the source, divided by the total number of bits in the bitstring (yielding assessed bits of entropy per output bit). This will be a value between zero (no entropy) and one (full entropy).

Entropy Source

A source of random bitstrings. There is no assumption that the bitstrings are output in accordance with a uniform distribution. The entropy source includes a noise source (e.g., thermal noise or hard drive seek times), health tests, and an optional conditioning component.

False Alarm

An erroneous indication that a component has malfunctioned, despite the fact that the component was behaving correctly. See also False Positive.

False Positive

An erroneous acceptance of the hypothesis that a statistically significant event has been observed. This is also referred to as a Type 1 error. When 'health-testing' the components of a device, it often refers to a declaration that a component has malfunctioned – based on some statistical test(s) – despite the fact that the component was actually working correctly. See False Alarm.

Full Entropy

Ideally, to say that a bitstring provides "full entropy" would imply that it was selected uniformly at random from the set of all bitstrings of its length – in which case, each bit in the string would be uniformly distributed (i.e., equally likely to be 0 or 1) and statistically independent of the other bits in the string. However, for the purposes of this Recommendation, an n-bit string is said to provide full entropy if it is obtained through a process that is estimated to provide at least $(1-\varepsilon)n$ bits of entropy, where $0 \le \varepsilon \le 2^{-64}$. Such strings are an acceptable approximation to the ideal.

Full Entropy Source

An entropy source that is designed to output bitstrings providing full entropy output. See Full Entropy, above.

Hash Function

See Cryptographic Hash Function. Hash algorithm and cryptographic hash function are used interchangeably in this Recommendation.

Health Test

A test that is run to check that a mechanism continues to behave as expected.

Health Testing

Testing within an implementation prior to or during normal operation to determine that the implementation continues to perform as expected and as validated.

Independent

Two discrete random variables X and Y are (statistically) independent if the probability that an observation of X will have a certain value does not change, given knowledge of the value of an observation of Y (and vice versa). When this is the case, the probability that the observed values of X and Y will be X and Y will be X and Y will be X (determined without regard for the value of X) multiplied by the probability that the observed value of X will be X0 (determined without regard for the value of X1).

Independent and Identically Distributed (IID)

A sequence of random variables for which each element of the sequence has the same probability distribution as the other values and all values are mutually independent.

Known-Answer Test

A test that uses a fixed input/output pair (where the output is the correct output from the component for that input), which is used to determine correct implementation and/or continued correct operation.

Markov Model

A model for a probability distribution whereby the probability that the i^{th} element of a sequence has a given value depends only on that value and the value of the previous k elements of the sequence. The model is called a k^{th} order Markov model.

Min-entropy

The *min-entropy* (in bits) of a discrete random variable X is the largest value m having the property that each observation of X provides at least m bits of information (i.e., the min-entropy of X is the greatest lower bound for the information content of potential observations of X). The min-entropy of X is a lower bound on its entropy. The precise formulation for the min-entropy, m, for a given finite probability distribution, $p_1, ..., p_M$, is $m = -\log_2(\max(p_1, ..., p_M))$. Min-entropy is often used as a worst-case measure of the

uncertainty associated with observations of X: If X has min-entropy m, then the probability of observing any particular value is no greater than 2^{-m} . (See also Entropy.)

Noise Source

The component of an entropy source that contains the non-deterministic, entropy-producing activity.

Non-Deterministic Random Bit Generator (NRBG)

An RBG employing an entropy source, which (when working properly) produces outputs that have full entropy (see Full Entropy). Also called a True Random Bit (or Number) Generator.

On-demand Test

A health test that is available to be run whenever a user or a relying component requests it.

Output Space

The set of all possible bitstrings that may be obtained as samples from a digitized noise source.

P-value

The probability (under the null hypothesis of randomness) that the chosen test statistic will assume values that are equal to or more extreme than the observed test statistic value when considering the null hypothesis. The *p*-value is frequently called the "tail probability."

Probability Distribution

The probability distribution of a random variable X is a function F that assigns to the interval [a, b] the probability that X lies between a and b (inclusive).

Probability Model

A mathematical representation of a random phenomenon.

Pseudorandom

A deterministic process (or data produced by such a process) whose observed outcomes (e.g., output values) are effectively indistinguishable from those of a random process, as long as the internal states and internal actions of the process are hidden from observation. For cryptographic purposes, "effectively indistinguishable" means "not within the computational limits established by the intended security strength."

Random

A non-deterministic process (or data produced by such a process) whose possible outcomes (e.g., output values) are observed in accordance with some probability distribution. The term is sometimes (mis)used to imply that the probability distribution is uniform, but no such blanket assumption is made in this Recommendation.

Random Bit Generator (RBG)

A device or algorithm that is capable of producing a random sequence of (what are effectively indistinguishable from) statistically independent and unbiased bits. An RBG is classified as either a DRBG or an NRBG.

Sample (from a Digitized Noise Source)

An observation of the natural output unit from a digitized (but otherwise unprocessed) noise source. Common examples of output values obtained by sampling are single bits, single bytes, etc. (The term "sample" is often extended to denote a sequence of such observations; this Recommendation will refrain from that practice.)

Security Boundary

A conceptual boundary that is used to assess the amount of entropy provided by the values output from an entropy source. The entropy assessment is performed under the assumption that any observer (including any adversary) is outside of that boundary.

Seed

Noun: A bitstring that is used as input to (initialize) an algorithm. In this Recommendation, the algorithm using a seed is usually a DRBG. The entropy provided by the seed must be sufficient to support the intended security strength of the DRBG.

Verb: To acquire a bitstring using a process that provides sufficient entropy for the desired security strength and subsequently supply that bitstring to (initialize) an algorithm (e.g., a DRBG).

Sequence

An ordered list of quantities.

Shall

Used to indicate a requirement of this Recommendation.

Should

Used to indicate a highly desirable feature that is not necessarily required by this Recommendation.

Source of entropy input (SEI)

A component of an RBG that outputs bitstrings that can be used as entropy input by a DRBG mechanism. See [SP 800-90C].

Stable Distribution

A random variable is stable if it has the property that linear combinations of two independent copies of the variable have the same distribution; i.e., let X_1 and X_2 be independent copies of a random variable X. Then X is said to be stable if for any constants a>0 and b>0 the random variable $aX_1 + bX_2$ has the same distribution as cX + d for some constants c>0 and d.

Startup Testing (of an Entropy Source)

A suite of health tests that are performed every time the entropy source is initialized or powered up. These tests are carried out before any output is released from the entropy source.

String

See Sequence.

Testing Laboratory

An entity that has been accredited to perform cryptographic security testing on an entropy source, as specified in this Recommendation.

Unbiased

A random process (or the output produced by such a process) is said to be unbiased with respect to an assumed discrete set of potential outcomes (e.g., possible output values) if each of those outcomes has the same probability of occurring. (Contrast with biased.) A pseudorandom process is said to be unbiased if it is effectively indistinguishable from an unbiased random process (with respect to the same assumed discrete set of potential outcomes). For cryptographic purposes, "effectively indistinguishable" means "not within the computational limits established by the intended security strength."

3.0 Symbols and Abbreviated Terms

The following symbols are used in this document.

Symbol	Meaning		
Н	The min-entropy of the samples from a (digitized) noise source or of the output from an entropy source; the min-entropy assessment for a noise source or entropy source.		
hamming_weight($s_i,,s_{i+n}$)	The number of ones in the sequence $s_i, s_{i+1},, s_{i+n}$.		
$\max(a,b)$	The maximum of the two values, a and b ; e.g. if $a > b$, $max(a, b) = a$.		
$\min(a, b)$	The minimum of the two values, a and b ; e.g. if $a < b$, $min(a, b) = a$.		
N	The number of samples in a dataset, i.e., the length of the dataset in samples.		
n	The number of bits that an entropy source can obtain as a single (conditioned) output from its (digitized) noise source.		
$p(x_i)$ or $prob(x_i)$	The probability for an observation or occurrence of x_i .		
pmax	The probability of the most common sample from a noise source.		
S_i	A sample in a dataset.		
S	A dataset.		
x_i	A possible output from the (digitized) noise source.		
[a,b]	The interval of numbers between a and b , including a and b .		
	A function that returns the smallest integer greater than or equal to <i>x</i> ; also known as the <i>ceiling</i> function.		
	A function that returns the largest integer less than or equal to x ; also known as the <i>floor</i> function.		
Round(x)	A function that returns the integer that is closest to <i>x</i> . If <i>x</i> lies half-way between two integers, the larger integer is returned.		
$Sqrt(x)$ or \sqrt{x}	A function that returns a number y whose square is x . For example, $Sqrt(16) = 4$.		

The following abbreviations are used in this document.

Abbreviations	Meaning		
ANS	American National Standard		
CAVP	Cryptographic Algorithm Validation Program		

CMAC	Cipher-based Message Authentication Code, as specified in SP800-38B
CMVP	Cryptographic Module Validation Program
DRBG Deterministic Random Bit Generator	
FIPS	Federal Information Processing Standard
HMAC Keyed-Hash Message Authentication Code, specified in [FIPS	
IID	Independent and Identically Distributed
NIST	National Institute of Standards and Technology
NRBG	Non-deterministic Random Bit Generator
NVLAP National Voluntary Laboratory Accreditation Program	
RBG Random Bit Generator	
SP	NIST Special Publication

4.0 General Discussion

Three things are required to build a cryptographic RBG. First, a source of random bits is needed (the entropy source). Second, an algorithm (typically, a DRBG) is needed for accumulating and providing these numbers to the consuming application. Finally, there needs to be a way to combine the first two components appropriately for the cryptographic application.

SP 800-90B describes how to design and implement the entropy source. SP 800-90A describes deterministic algorithms that take an entropy input and use it to produce pseudorandom values. SP 800-90C provides the "glue" for putting the entropy source together with the algorithm to implement an RBG.

Specifying an entropy source is a complicated matter. This is partly due to confusion in the meaning of entropy, and partly due to the fact that, while other parts of an RBG design are strictly algorithmic, entropy sources depend on physical processes that may vary from one instance of a source to another. This section discusses, in detail, both the entropy source model and the meaning of entropy.

4.1 Entropy Estimation and Validation

The developer should make every effort to design an entropy source that can be shown to serve as a consistent source of entropy, producing bitstrings that can provide entropy at a rate that meets (or exceeds) a specified value.

In order to design an entropy source that provides an adequate amount of entropy per output bitstring, the developer must be able to accurately estimate the amount of entropy that can be provided by sampling its (digitized) noise source. The developer must also understand the behavior of the other components included in the entropy source, since the interactions between the various components will affect any assessment of the entropy that can be provided by an implementation of the design.

For example, if it is known that the (digitized) output from the noise source is biased, appropriate conditioning functions can be included in the design to reduce that bias to a tolerable level before any bits are output from the entropy source. Likewise, if the developer estimates that the noise source employed provides entropy at a rate of (at least) ½ bit of entropy per bit of (digitized) sample, that assessment will likely be reflected in the number of samples that are combined by a conditioning component to produce bitstrings with an entropy rate that meets the design requirements for the entropy source.

This Recommendation provides requirements and guidance that will allow for an entropy source to be validated and for an assessment of the entropy to be performed that will show the entropy source produces bitstrings that can provide entropy at a specified rate. Validation provides additional assurance that adequate entropy is provided by the source and may be necessary to satisfy some legal restrictions, policies, and/or directives of various organizations.

4.2 Entropy

The central mathematical concept underlying this Recommendation is entropy. Entropy is defined relative to one's knowledge of X prior to an observation, and reflects the uncertainty associated with predicting its value – the larger the entropy, the greater the uncertainty in predicting the value of an observation. There are many possible choices for an entropy measure; this Recommendation uses a very conservative measure known as min-entropy.

Min-entropy is often used as a worst-case measure of the uncertainty associated with observations of X: If X has min-entropy m, then the probability of observing any particular value is no greater than 2^{-m} . Let x_i be a digitized sample from the noise source that is represented in one or more bits, let $x_1, x_2, ..., x_M$ be the outputs from the noise source, and let $p(x_i)$ be the probability that x_i is produced at any given sampling time. The min-entropy of the outputs is:

$$-\log_2(\max p(x_i)).$$

This represents the best-case work for an adversary who is trying to guess an output from the noise source. For an in-depth discussion of entropy and the use of min-entropy in assessing an entropy source, see ANS X9.82, Part 1 [X9.82-1].

4.3 The Entropy Source Model

This section considers the entropy source in detail. Figure 1 illustrates the model that this Recommendation uses to describe an entropy source, including the components that an entropy source developer **shall** implement. These components are described in the following sections. Additional detail on each component can be found in ANS X9.82, Part 2 [X9.82-2].

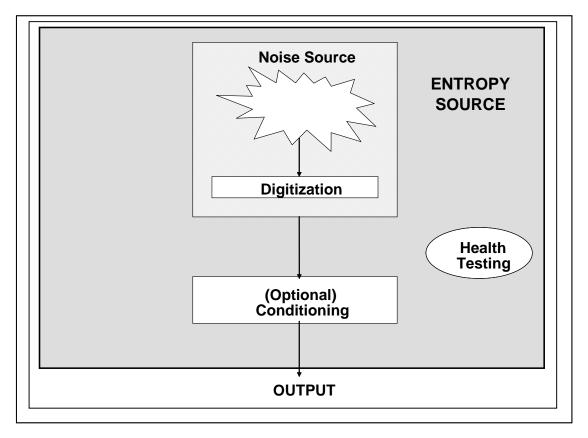


Figure 1: Entropy Source Model

4.3.1 Noise Source

The noise source is the root of security for the entropy source and for the RBG as a whole. This is the component that contains the non-deterministic, entropy-providing activity that is ultimately responsible for the uncertainty associated with the bitstrings output by the entropy source. If this component fails, no other mechanism in the RBG can compensate for the lack of entropy.

Fundamentally, the noise source provides random bits in the form of digital samples obtained from a non-deterministic process. If the non-deterministic process being sampled produces something other than binary data, the sampling process includes digitization. This Recommendation assumes that the sample values obtained from a noise source consist of fixed-length bitstrings, which determine the output space of the component.

4.3.2 Conditioning Component

The optional conditioning component is responsible for reducing bias and/or increasing the entropy rate of the resulting output bits (if necessary to obtain a target value). There are various methods for achieving this. In choosing an approach to implement, the developer may either choose to implement an **approved** cryptographic algorithm or a non-approved algorithm (see Section 6.4). The use of either of these approaches is permitted by this

Recommendation. The developer should consider the conditioning method and how variations in the behavior of the noise source may affect the entropy rate of the output. This will assist in determining the best approach to use when implementing a conditioning component.

4.3.3 Health Tests

Health tests are an integral part of the entropy source design; the health test component ensures that the noise source and the entropy source as a whole continue to operate as expected. The health tests can be separated into three categories; startup tests (on all components), continuous tests (mostly on the noise source), and on-demand tests (tests that are more thorough and time-consuming than the continuous tests).

Behavior tests, a type of health test, are performed on the parts of an implementation for which an exact response cannot be predicted (i.e., the noise source, for which the behavior is non-deterministic); normally, the acceptable responses are expected within a specified range of all possible responses. Behavior tests may be performed at specified times or may be performed continuously.

When testing the entropy source, the end goal is to obtain assurance that failures of the entropy source are caught quickly and with a high probability. Another aspect of health testing strategy is determining likely failure modes for the entropy source and, in particular, for the noise source. Comprehensive health tests will include tests that can detect these failure conditions.

5.0 Conceptual Interfaces

5.1.1 GetEntropy: An Interface to the Entropy Source

This section describes a conceptual interface to the entropy source that is compatible with the RBG interfaces in [SP 800-90C]. The interface described here can be considered to be a command interface into the outer entropy source box in Figure 1. This interface is meant to indicate the types of requests for services that an entropy source may support.

A **GetEntropy** call returns a bitstring and an assessment of the entropy it provides.

GetEntropy():

Output:

entropy_bitstring The string that provides the requested entropy.

assessed_entropy An integer that indicates the assessed number of bits of entropy

provided by *entropy_bitstring*.

status A boolean value that is TRUE if the request has been satisfied,

and is FALSE otherwise.

It should be noted that the interface defined here includes a return value indicating the amount of entropy provided by the returned bitstring. In practice, assessed_entropy does

not need to be returned as output if the amount of entropy provided by *entropy_bitstring* would already be known to the relying application (e.g., in implementations for which the amount of entropy provided is a predefined constant).

5.1.2 GetNoise: An Interface to the Noise Source

The conceptual interface defined here can be considered to be a command interface into the noise source component of an entropy source. This is used to obtain raw, digitized, but otherwise unprocessed, outputs from the noise source for use in validation testing or for external health tests. While it is not required to be in this form, it is expected that an interface exist such that the data can be obtained without harm to the entropy source. This interface is meant to provide test data to credit a noise source with an entropy estimate during validation or for health testing, and as such, does not contribute to the generation of entropy source output. It is feasible that such an interface is available only in "test mode" and that it is disabled when the source is operational.

This interface is not intended to constrain real-world implementations, but to provide a consistent notation to describe data collection from noise sources. Thus, the interface may indicate, for example, that a noise source generates bits in response to a request from the entropy source, when, in practice, the noise source may be passing random bits to the entropy source as the bits are generated; i.e., it 'pushes' data to the entropy source as it becomes available.

A **GetNoise** call returns raw, digitized, but otherwise unprocessed samples from the noise source.

GetNoise(*number_of_samples_requested*)

Input:

number_of_samples_requested An integer value that indicates the requested

number of samples to be returned from the noise

source.

Output:

noise_source_data The sequence of samples from the noise source,

with length *number_of_samples_requested*.

A boolean value that is TRUE if the request has

been satisfied, and is FALSE otherwise.

5.1.3 Health Test: An Interface to the Entropy Source

A **HealthTest** call is a request to the entropy source to conduct a test of its health. The **HealthTest** interface allows for various testing methods since this Recommendation does not require any particular on-demand health testing (see Section 6.5.1.3). Note that it may not be necessary to include a separate **HealthTest** interface if the execution of the tests can be initiated in another manner that is acceptable to [FIPS 140] validation.

HealthTest(*type_of_test_requested*)

Input:

type_of_test_requested A bitstring that indicates the type or suite of tests to be

performed (this may vary from one entropy source to

another).

Output:

pass-fail flag A boolean value that is TRUE if the entropy source

passed the requested test, and is FALSE otherwise.

6.0 Entropy Source Development Requirements

Included in the following sections are requirements for the entropy source as a whole, as well as for each component individually. The intent of these requirements is to assist the developer in designing/implementing an entropy source that can provide outputs with a consistent amount of entropy and to provide the required documentation for entropy source validation. The requirements below are intended to justify why the entropy source can be relied upon.

6.1 General Requirements for Design and Validation

The functional requirements for the entropy source as a whole are as follows:

- 1. The developer **shall** document the design of the entropy source as a whole, including the interaction of the components specified in Section 4.3. This documentation **shall** justify why the entropy source can be relied upon to produce bits with entropy.
- 2. The entropy source **shall** have a well-defined (conceptual) security boundary, which **shall** be the same as or be contained within a [FIPS 140] cryptographic module boundary. This security boundary **shall** be documented; the documentation **shall** include:
 - A description of the content of the security boundary; note that the security boundary may extend beyond the entropy source itself (e.g. the entropy source may be contained within a larger boundary that also contains a DRBG); also note that the security boundary may be logical, rather than physical.
 - A description of how the security boundary ensures that an adversary outside the boundary cannot reduce the entropy below the assessed entropy, either through observation or manipulation.

- Any assumptions concerning support functions (such as a power supply that cannot be monitored or manipulated) upon which the security boundary depends.
- 4. The developer shall document the range of operating conditions under which the entropy source may be expected to continue to generate acceptable random data; the documentation shall clearly describe the measures that have been taken in system design to ensure the entropy source continues to operate correctly under those conditions.
- 5. The entropy source **shall** be capable of being validated for conformance to [FIPS 140], and include appropriate interfaces to obtain test data, as described in Section 5.0.
- 6. Documentation **shall** be provided that describes the behavior of the noise source and why it is believed that the entropy rate does not fluctuate during normal operation.
- 7. Upon notification that the health tests have detected a malfunction, the entropy source **shall** cease outputting data and **should** notify the consuming application (e.g., the RBG) of the error condition.

An optional, recommended feature of the entropy source is as follows:

8. The entropy source **may** contain multiple noise sources to improve resiliency with respect to degradation or misbehavior. When this feature is implemented, the requirements specified in Section 6.3 **shall** apply to each noise source.

6.2 Full Entropy Source Requirements

Some of the RBG constructions in [SP 800-90C] depend on a Full Entropy Source, e.g. an entropy source that closely approximates one in which each output bit is uniformly distributed and independent of all other output bits. Additional requirements are levied on sources that claim to provide full entropy output:

- 1. Bitstrings output from the entropy source **shall** provide at least $(1-\varepsilon)n$ bits of entropy, where *n* is the length of each output string and $0 \le \varepsilon \le 2^{-64}$.
- 2. Noise source output, if conditioned, shall be conditioned with an approved cryptographic conditioning function for full entropy to be provided by the entropy source. At least twice the block size of the underlying cryptographic primitive shall be provided as input to the conditioning function to produce full entropy output.

6.3 Noise Source Requirements

The functional requirements for the noise source are as follows:

- 1. Although the noise source is not required to produce unbiased and independent outputs, it **shall** exhibit probabilistic behavior; i.e., the output **shall not** be definable by any known algorithmic rule.
- 2. The developer **shall** document the operation of the noise source; this documentation **shall** include a description of how the noise source works and rationale about why the noise provides acceptable entropy output, and **should** reference relevant, existing research and literature.
- 3. The noise source **shall** be amenable to testing to ensure proper operation. In particular, it **shall** be possible to collect data from the noise source for health testing and during the validation process in order to allow an independent determination of the entropy rate, and the appropriateness of the health tests on the noise source. Acquiring outputs from the noise source **shall not** alter the behavior of the noise source or affect the subsequent output in any way.
- 4. Failure or severe degradation of the noise source **shall** be detectable. Methods used to detect such conditions **shall** be documented.
- 5. The noise source documentation **shall** describe the conditions, if any, under which the noise source is known to malfunction or become inconsistent, including a description of the range of environments in which the noise source can operate correctly. Continuous tests or other mechanisms in the entropy source **shall** protect against producing output during such malfunctions.
- 6. The noise source **shall** be protected from adversarial knowledge or influence to the greatest extent possible. The methods used for this **shall** be documented, including a description of the (conceptual) security boundary's role in protecting the noise source from adversarial observation or influence.

6.4 Conditioning Component Requirements

The functional requirements for the optional conditioning component are as follows:

- 1. The entropy source developer **shall** document whether or not the entropy source performs conditioning. If conditioning depends on choices made external to the entropy source (i.e. if it is a selectable option), this feature **shall** be documented.
- 2. If the entropy source performs conditioning, the method **shall** be described and **shall** include an argument for how the chosen method meets its objectives with respect to reducing the bias in the data obtained from the noise source and/or producing output that meets (or exceeds) a specified entropy rate.

- 3. The entropy source conditioning component outputs **shall** be capable of being subjected to health and validation testing.
- 4. The entropy source developer **shall** state and justify estimates of the bias and entropy rate that is expected of the bitstrings output by the conditioning component. If the entropy source is meant to produce full entropy output, the output bitstrings **shall** satisfy the requirements in Section 6.2.
- 5. Documentation describing how variations in the behavior of the noise source will affect the bias and entropy rate of the conditioning component's output **shall** be provided.

6.4.1 Non-Approved Conditioning Components

As discussed previously, there are various methods for designing a conditioning component for an entropy source. One such method involves using a non-approved conditioning function to condition the noise source outputs. If a non-approved conditioning component is chosen in design of the entropy source, then this conditioning component shall undergo extensive testing to determine the entropy provided by the conditioned outputs (see Section 8.2). The entropy rate provided **shall** be no greater than the entropy rate provided by the input to the conditioning component; full entropy **shall not** be provided by non-approved conditioning components.

6.4.2 Approved Cryptographic Conditioning Components

Using an **approved** cryptographic function (i.e., algorithm) to condition the noise source outputs is beneficial because the **approved** functions can uniformly distribute the input entropy throughout the output of the conditioning component and as such can be used to provide full entropy output. In general, the entropy estimate for the conditioning function output will be no greater than the output length of the conditioning component.

This Recommendation **approves** both keyed and unkeyed functions for the conditioning component, as discussed in Sections 6.4.2.1 and 6.4.2.2, respectively. These **approved** conditioning functions produce the following results:

- 1. When an input string with m bits of assessed entropy is provided to an approved conditioning function with an n-bit output, the resulting assessed entropy is uniformly distributed across the entire n-bit output. Note that if $m \ge n$, full entropy output is not necessarily provided; see item 2.
- 2. When an input string with 2n bits (or more) of assessed entropy is provided to an approved conditioning function with an n-bit output, the resulting n-bit output is considered to have full entropy.

6.4.2.1 Approved Keyed Conditioning Functions

Three keyed functions are **approved** for the conditioning component:

1. HMAC, as specified in [FIPS 198], with any **approved** hash function specified in [FIPS 180],

- 2. CMAC, as specified in [SP 800-38B], with any **approved** block cipher algorithm (see [FIPS 197] and [SP 800-67]), and
- 3. CBC-MAC, as specified in Section 6.4.2.1.2, with any **approved** block cipher algorithm. CBC-MAC **shall not** be used for other purposes.

6.4.2.1.1 General Constructions for Approved Keyed Conditioning Functions

This general construction is to be used for the approved keyed conditioning functions listed in Section 6.4.2.1. The following notation is used in the construction:

- $\mathbf{F}(K, X)$ The notation used to represent the **approved** keyed conditioning function, with key K and input string X.
- n The number of bits output by **F**; for CMAC and CBC-MAC, n is the length (in bits) of the output block of the block cipher algorithm; for HMAC, n is the length (in bits) of the hash function output block.
- S An input string with assessed entropy m.
- A Additional input; any bit string, including the null string (e.g., a timestamp, sequence number, or previous output value).
- K Any key, e.g., a constant across all implementations, or a value initialized once per entropy source, or initialized upon start-up.
- Y The *n*-bit output of the conditioning function.

Process:

- 1. $Y = \mathbf{F}(K, S||A)$.
- 2. Output *Y* as the conditioned output.

If the input string S was assessed at 2n bits of min-entropy or more (i.e., $m \ge 2n$), then Y may be considered to have n bits of full entropy output. If S was assessed at m bits of min-entropy and $2n > m \ge n$, then Y shall be assessed at $\frac{m}{2}$ bits of min-entropy. If S was assessed at m bits of min-entropy and m < n then Y shall be assessed at m bits of min-entropy.

6.4.2.1.2 CBC-MAC Conditioning Function

For an **approved** conditioning function, CBC-MAC is defined as follows. This construction **shall not** be used for any other purpose. The following notation is used for the construction:

- $\mathbf{E}(K,X)$ The notation used to represent the encryption of input string X using key K.
- *n* The length (in bits) of the output block of the cipher algorithm.
- S An input string; the length of S **shall** be an integer multiple of the output length n of the block cipher algorithm and **shall** always be the same length (i.e., variable length strings **shall not** be used as input).
- w The number of *n*-bit blocks in S; an integer.

- *K* The key to be used.
- V The *n*-bit CBC-MAC output.

Process:

- 1. Let $s_0, s_1, \dots s_{w-1}$ be the sequence of blocks formed by dividing S into n-bit blocks; i.e., each s_i consists of n bits.
- 2. V = 0.
- 3. For i = 0 to w-1

$$V = \mathbf{E}(K, V \oplus s_i).$$

4. Output *V* as the CBC-MAC output.

6.4.2.2 Approved Unkeyed Conditioning Functions

Three unkeyed functions are approved as conditioning functions:

- 1. Any **approved** hash function specified in [FIPS 180],
- 2. **hash_df**, as specified in [SP 800-90A], using any **approved** hash function specified in [FIPS 180], and
- 3. **bc_df**, as specified in [SP800-90A], using any **approved** block cipher algorithm (see [FIPS 197] and [SP 800-67]).

The following notation is used for the construction of the unkeyed conditioning function:

- $\mathbf{F}(X)$ The notation used to represent the **approved** unkeyed conditioning function listed above, applied to input string X.
- S An input string assessed at m bits of entropy.
- A Additional input; any bit string, including the null string (e.g. a timestamp, sequence number or previous output value).
- *n* The number of bits output by **F**; for **bc_df**, *n* is the length (in bits) of the output block of the block cipher algorithm; otherwise, *n* is the length (in bits) of the hash function output block.
- Y The *n*-bit conditioned output.

Process:

- 1. $Y = \mathbf{F}(S||A)$.
- 2. Output *Y* as the conditioned output.

If the input string S was assessed at 2n bits of min-entropy or more (i.e., $m \ge 2n$), then Y may be considered to have n bits of full entropy output. If S was assessed at m bits of min-entropy and $2n > m \ge n$, then Y shall be assessed at $\frac{m}{2}$ bits of min-entropy. If S was

assessed at m bits of min-entropy and m < n then Y shall be assessed at m bits of min-entropy.

6.4.2.3 Recommendations for Improved Security

The developer is permitted to select keys and additional input arbitrarily. However, the following recommendations may improve security:

- 1. In the keyed functions in Section 6.4.2.1, the key *K* **should** be generated randomly each time a device starts up (e.g., *K* can be obtained by using entropy bits from the noise source with at least *n* bits of assessed entropy, where *n* is the output length of the conditioning function to be used, and processing the entropy bits using the conditioning function with an arbitrary key; the result can be used as *K*).
- 2. The optional additional input *A* **should** include some function of the previous output from the conditioning function in order to smooth out variations in the entropy source behavior.

6.5 Health Test Requirements

The objective of these tests is to detect deviations from the intended behavior of the entropy source in general (and the noise source in particular) during operation. The following are general requirements for entropy source health tests:

- 1. Testing **shall** be performed at startup and continuously thereafter to ensure that all components of the entropy source continue to work correctly.
- 2. All entropy source health tests and their rationale **shall** be documented. The documentation **shall** include a description of the health tests, the rate and conditions under which each health test is performed (e.g., at startup, continuously, or on-demand), the expected results for each health test, and rationale indicating why each test is believed to be appropriate for detecting one or more failures in the entropy source.

6.5.1 Health Tests on the Noise Source

6.5.1.1 General Requirements

The health testing of a noise source is likely to be very technology-specific. Since, in the vast majority of cases, the noise source will not produce unbiased, independent binary data, traditional statistical procedures (e.g., monobit, chi-square, and runs tests) that test the hypothesis of unbiased, independent bits almost always fail, and thus are not useful for monitoring the noise source. In general, tests on the noise source have to be tailored carefully, taking into account the expected statistical behavior of the correctly operating noise source.

Health testing of noise sources will typically be designed to detect failures of the noise source based on the expected output during a failure, or to detect a deviation from the

expected output during the correct operation of the noise source. The following are requirements for noise source health tests.

- 1. At a minimum, continuous testing as defined in Section 6.5.1.2 **shall** be implemented. In addition, the developer **shall** document any known noise source failure modes. Continuous tests **should** also be devised and implemented to detect those failures.
- 2. Testing **shall** be performed on the digitized samples obtained from the noise source.
- 3. The noise source **shall** be tested for variability in the output sample values. (A sequence of outputs lacking in variability could, for example, consist of a single repeated value.)
- 4. Noise source bits generated during start-up that have successfully passed the start-up health tests **may** be used to produce entropy source output (after (optional) conditioning).
- 5. When health testing detects a failure in the noise source, the entropy source **shall** be notified.

Optional features for noise source health tests are:

6. Appropriate health tests tailored to the noise source **should** place special emphasis on the detection of misbehavior near the boundary between the nominal operating environment and abnormal conditions. This requires a thorough understanding of the operation of the noise source.

6.5.1.2 Continuous Testing

The purpose of continuous testing is to allow the entropy source to detect many kinds of disastrous failures in its underlying noise source. These tests are run continuously on all digitized samples obtained from the noise source, and so must have a very low probability of yielding a false positive. In many systems, a reasonable false positive rate will make it extremely unlikely that a properly-functioning device will indicate a malfunction, even in a very long service life. In the case where an error is identified, the noise source shall notify the entropy source of the malfunction.

Note that the tests defined operate over a stream of values. These sample values may be output as they are generated (i.e., processed by the conditioning component, as appropriate, and used by the entropy source to produce output); there is no need to inhibit output from the noise source or entropy source while running the test. It is important to understand that this may result in poor entropy source outputs for a time since the error is only signaled once significant evidence has been accumulated and these values may have already been output by the source. As a result it is important that the false positive rate be set to an

acceptable level. Below, all calculations assume that a false positive rate of approximately once per billion samples generated by the noise source is acceptable; however, the formulas given can easily be adapted for even lower false positive probabilities, if necessary.

Health tests are required for all entropy sources. The continuous tests discussed in this Section are focused on noise source behavior and on detecting failures as the noise source runs. The continuous tests **shall**:

- Include the two tests below: the Repetition Count Test and the Adaptive Proportion Test; or
- Include other tests that detect the same failure conditions reliably, according to the criteria given below in Section 10.0.

6.5.1.2.1 Repetition Count Test

The Repetition Count Test is an updated version of the "stuck bit" test—its goal is to quickly detect a catastrophic failure that causes the noise source to become "stuck" on a single output value for a long time. Given the assessed min-entropy, H, of the noise source, it is easy to compute the probability that a sequence of N consecutive samples will yield identical sample values. For example, a noise source with one bit of min-entropy per sample has no more than a 1/2 probability of repeating some sample value twice in a row, no more than 1/4 of repeating some sample value three times in a row, and in general, no more than $(1/2)^{N-1}$ probability of repeating some sample value N times in a row. More generally, if a dataset of N consecutive sample values is obtained from a noise source with N bits of min-entropy per sample, there is no greater than $(2^{-H})^{(N-1)}$ of obtaining a sequence of N identical sample values.

This test's cutoff values can be applied to any entropy estimate, H, including very small and very large estimates. However, it is important to note that this test is not very powerful – it is able to detect only catastrophic failures of an entropy source. For example, a noise source evaluated at eight bits of min-entropy per sample has a cutoff value of five repetitions to ensure a false-positive rate of approximately once per four billion samples generated. If that noise source somehow failed to the point that it was providing only four bits of min-entropy per sample, it would still be expected to take about sixty-five thousand samples before the Repetition Count Test would notice the problem.

As the noise source generates outputs, the entropy source keeps track of two variables and a constant, *C*:

- 1. A = the most recently seen sample value.
- 2. B = the number of consecutive times that the value A has been seen.
- 3. C = the cutoff value at which the Repetition Count Test fails.

Therefore, running the Repetition Count Test requires enough memory to store A, B, and C. The value of C does not need to be computed each time the test is run since C is computed at design time as follows.

If W > 0 is the acceptable false-positive probability associated with an alarm triggered by C repeated sample values, then the formula for the cutoff value employed by the Repetition Count Test is:

$$C = \left\lceil 1 + \frac{(-\log(W))}{H} \right\rceil \ge 2.$$

This value of C is the smallest integer satisfying the inequality $W \ge (2^{-H})^{(C-1)}$, which ensures that the probability of obtaining a sequence of C identical values from C consecutive noise source samples is no greater than W (when the noise source is providing entropy at the assessed rate of H bits per sample).

Thus, for $W = 2^{-30}$, an entropy source with H = 7.3 bits per sample would have a Repetition Count Test cutoff value of $\left[1 + \frac{30}{7.3}\right] = 6$.

The test is performed as follows:

- 1. Let A be the first sample value produced by the noise source, and let B = 1.
- 2. For each new sample processed:
 - a) If the new sample value is A, then B is incremented by one.
 - i. If B = C, then an error condition is raised due to a failure of the test.
 - b) Else:
 - i. A := the new sample
 - ii. B := 1
 - iii. Repeat Step 2.

This test continues indefinitely while the entropy source is operating. Note that the sample values may be output as they are generated (i.e., processed by the conditioning component, as appropriate, and used by the entropy source to produce output); there is no need to inhibit output from the noise source or entropy source while running the test.

6.5.1.2.2 Adaptive Proportion Test

The Adaptive Proportion Test is designed to detect a large loss of entropy, such as might occur as a result of some physical failure or environmental change affecting the noise source. The test continuously measures the local frequency of occurrence of some sample value in a sequence of noise source samples to determine if the sample occurs too frequently.

As the noise source generates sample values, the entropy source keeps track of three variables and three constants:

1. A = the sample value currently being counted.

- 2. S = the number of noise source samples examined so far in this run of the test.
- 3. B = the current number of times that A has been seen in the S samples examined so far.
- 4. N = the total number of samples that must be observed in one run of the test, also known as the "window size" of the test.
- 5. C = the cutoff value above which the test should fail.
- 6. W = the probability of a false positive; $W = 2^{-30}$ for this Recommendation.

The test is performed as follows:

- 1. The entropy source obtains the current sample from the noise source.
- 2. If S = N, then a new run of the test begins:
 - a) A := the current sample value.
 - b) S := 0.
 - c) B := 0.
- 3. Else: (the test is already running)
 - a) S := S + 1.
 - b) If A = the current sample value, then:
 - i. B := B + 1.
 - ii. If B > C then raise an error condition, because the test has detected a failure.

This test continues while the entropy source is running. Running the test requires enough memory to store the sample value that is being counted, (A), the count of its occurrences (B), and an indication of the number of samples that have been examined in this run so far (S). The other values listed above are constants that are defined in the following sections. Note that sample values are used by the entropy source as they are produced by the noise source; there is no need to inhibit output from the entropy source or noise source while running the test.

6.5.1.2.2.1 Parameters for the Adaptive Proportion Test

As noted above, there are three variables in the Adaptive Proportion Test that are modified as the test runs. There are also three constant values that are determined prior to the start of the test. W, the false positive rate, is set at 2^{-30} for this Recommendation. This section will describe how to determine N and C based on the noise source being tested.

6.5.1.2.2.1.1 Determining the Window Size, N

The most important consideration in configuring this test is determining the window size. This involves the following trade-offs:

 Some noise sources simply do not generate very many samples. If an entropy source never processes as many noise source samples as appear in a window for this test, the test will never complete, and there will be little or no benefit in running the test at all.

- A larger window size allows for the detection of more subtle failures in the noise source. On one extreme, a window size of 65536 samples can detect relatively small losses in entropy; on the other, a very small window size of 16 samples can reliably detect only the most catastrophic losses in entropy (and is therefore not included in this Recommendation).
- A larger window size means that each test takes longer to complete. Due to the way the Adaptive Proportion Test works, its result is dependent on what value it samples at the beginning of a test run. Thus, the combination of a large window size and a relatively low-rate noise source can ensure that failures take a very long time to detect, even when the test is capable of detecting them.

The window sizes allowed for this test are 64, 256, 4096, and 65536. These provide a range of different performances. All entropy sources **shall** continuously run the Adaptive Proportion Test using at least one of these window sizes, **should** run the Adaptive Proportion Test with the 4096 window size, and **may** continuously run the Adaptive Proportion Test in parallel for two or more different window sizes. See Section 6.5.1.2.2.2 for further discussion on running two or more versions of the test in parallel.

As seen in Table 1, a noise source claiming four bits of entropy per sample (i.e., H = 4 in the first column: the expected amount of entropy per sample), and using a window size of 256, would be expected to be able to detect a 31% loss of entropy (that is, if the entropy was reduced to only 2.76 bits of entropy per sample, the test would detect the loss).

Н	Window Size				
	64	256	4096	65536	
1	67%	39%	13%	3%	
2	56%	32%	11%	3%	
4	50%	31%	12%	3%	
8	54%	40%	19%	6%	
16	69%	56%	40%	22%	

Table 1 Loss of Entropy Detected Based on Entropy per Sample and Window Size

Figure 2 may make the tradeoff easier to understand. It shows the relationship between the window size and the amount of entropy that must be lost by the noise source before the loss becomes detectable, for a variety of amounts of entropy claimed per sample.

The black line at 30% provides a reasonable estimate for how much entropy can be lost before introducing a practical weakness in an RBG. This suggests that the 4096-bit window size is sufficient to catch this amount of entropy loss for most noise sources. However, noise sources with a large number of bits per sample become less and less capable of detecting a large loss of entropy, both because the test is less powerful, and

because the test will only detect a failure of the noise source if the first value sampled in a run of the test is more probable than the entropy estimate expects it to be.

80% 70% Bits of Entropy Per Sample 60% -64 50% **→**256 40% --4096 *65536 30% 20% 10% 0% 20 0 5 10 15 25 Size of Entropy Loss Detectable

How Does Window Size Affect Power of Tests?

Figure 2 Relationship Between Window Size and Detectable Loss of Entropy

6.5.1.2.2.1.2 Computing the Cutoff Value, C

The cutoff value is the value above which the Adaptive Proportion Test fails. The cutoff value C for the estimated min-entropy per sample H, window size N, and acceptable false-positive rate W is computed by finding the critical value¹ at $\alpha = 1$ -W of the binomial distribution with N trials and a probability per trial of 2^{-H} .

The following table gives cutoff values for various min-entropy estimates per sample (H) and window sizes (N), using an acceptable false-positive probability per N samples of 2^{-30} .

N	64	256	4096	65536
Н	Cutoff	Cutoff	Cutoff	Cutoff
1	51	168	2240	33537
2	35	100	1193	17053

¹ This can be computed using widely-available spreadsheet applications. In Microsoft Excel, Open Office Calc, and iWork Numbers, the calculation is done with the function =CRITBINOM(). For example, in Microsoft Excel, C would be computed as = $CRITBINOM(N, 2^{-}(-H), 1-T)$.

3	24	61	643	8705
4	16	38	354	4473
5	12	25	200	2321
6	9	17	117	1220
7	7	15	71	653
8	5	9	45	358
9	4	7	30	202
10	4	5	21	118
11	3	4	15	71
12	3	4	11	45
13	2	3	9	30
14	2	3	7	21
15	2	2	6	15
16	2	2	5	11
17	1	2	4	9
18	1	2	4	7
19	1	1	3	6
20	1	1	3	5

Table 2 Cutoff Values Based on Entropy per Sample and Window Size Given a 2⁻³⁰ False Positive Rate

Table 2 shows that for a noise source claiming four bits of min-entropy per sample and using a 4096 sample window size, the Adaptive Proportion Test would have a cutoff value of 354. If the count within the window ever exceeds 354 matches of the first value sampled in a run of the test, the test fails, and an error condition shall be raised.

Notice that given the window sizes above, the Adaptive Proportion Test is not defined for H < 1. That is, when the noise source has less than one bit of min-entropy per sample, the Adaptive Proportion Test cutoffs are not defined. When H is too small for the required window sizes, the test **shall** be performed as follows:

- 1. Let Q be the number of samples needed to get a combined entropy estimate large enough for the chosen window size. (For example, if N = 256, Table 2 requires that H have a minimum value of one. However, if the actual value of H for a sample is 0.1, then 10 samples need to be combined; i.e., Q = 10.)
- 2. For the Adaptive Proportion Test, successive *Q*-long sequences of low-entropy samples are concatenated into a single combined sample with an acceptable minentropy.
- 3. The Adaptive Proportion Test's cutoff value is chosen for the combined samples'

entropy estimate of QH bits².

6.5.1.2.2.2 Running Adaptive Proportion Tests in Parallel

The performance tradeoffs between different window sizes means that choosing a single window size requires either losing the ability to quickly discover large failures of the noise source, or losing the ability to eventually discover subtle failures. A natural solution to this is to run the Adaptive Proportion Test in parallel with different window sizes. For example, it would be natural in some applications to use window sizes of both N = 64 and N = 4096 to be used in parallel.

If two different window sizes are used, individual counters and cutoff values **shall** be maintained for each window size.

6.5.1.3 Start-up and On-Demand Testing

Start-up testing is required to ensure that the entropy source components are working as expected in order to verify that nothing failed since the last time the start-up tests were run. This Recommendation requires that, at a minimum, the continuous tests be run at start-up; note that the same requirements apply to the start-up tests as do the continuous tests: either both the Repetition Count Test and the Adaptive Proportion test or their equivalent(s) (See Section 10.0) **shall** be used as the start-up tests. At a minimum, the start-up tests **shall** consist of one full cycle of the continuous tests to ensure that the continuous tests have had an opportunity to verify that the device is working before it is used. Other tests in addition to the continuous tests may also be run at start-up.

The parameters chosen for the start-up testing may be different than those used for the continuous tests if power and memory are areas of concern while the entropy source is starting up. Note that the entropy source **shall not** use noise source output for operational purposes until it has passed the start-up tests. Therefore, more memory will be required, depending on the parameters chosen, if the noise source outputs used during start-up testing are intended to be used to create operational entropy source output since it will have to be buffered until the start-up health tests have completed successfully. An alternative is to throw out any noise source output used in start-up testing.

This Recommendation does not require that any particular on-demand testing be performed during operation. However, it does require that the entropy source be capable of performing on-demand health tests. Note that resetting, rebooting, or powering up are acceptable methods for instituting an on-demand test if the procedure results in immediate execution of the start-up tests.

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² Note that due to the conservative approach to entropy estimation it is possible to safely add together entropy estimates, so that concatenating ten samples with one bit of min-entropy per sample yields a combined sample with no less than ten bits of min-entropy.

6.5.2 Health Tests on the Conditioning Component

The role of the conditioning component is to reduce the bias that would otherwise be present in the entropy source output and/or to ensure that the output bitstrings provide entropy at an acceptable rate. The conditioning component will implement a deterministic algorithm.

The functional requirements for the health tests of the conditioning component are:

- 1. The conditioning component **shall** be tested during start-up with known answer tests necessary to establish that the conditioning component is working as designed.
- 2. The developer **shall** describe the health tests implemented for the conditioning component to include the failure conditions covered by the tests chosen.

7.0 Validation Data and Documentation Requirements

Entropy source validation is necessary in order to obtain assurance that all relevant requirements of this Recommendation are met. Validation consists of testing by an NVLAP-accredited laboratory against the requirements of SP 800-90B, followed by a review of the results by NIST's CAVP and CMVP.

The validation of an entropy source presents many challenges. No other part of an RBG is so dependent on technological and environmental differences. At the same time, the proper operation of the entropy source is essential to the security of an RBG. This section presents high-level requirements (on both developers and testers) for validation and provides a method for mapping large samples into smaller bitstrings for situations in which it is difficult to collect sufficient data for validation, given the size of the sample (see Section 7.2). The requirements below are intended to enable entropy source validation to help justify why the entropy source can be relied upon.

7.1 General Validation Requirements

The entropy source consists of three components: the noise source, health tests, and an optional conditioning component. The entropy source will have no more entropy than that provided by the noise source, and as such, the noise source requires special attention during validation testing. This is partly due to the fundamental importance of the noise source (if it does not do its job, the entropy source will not provide the expected amount of security), and partly because the probabilistic nature of its behavior requires more complicated testing.

This section contains requirements for submitting an entropy source for [FIPS 140] validation. Section 8.0 describes the testing strategy for noise sources, conditioned output, and full-entropy sources. Section 9.0 details the specific validation tests.

The following are general requirements for validation testing.

1. Data Collection:

- Data collection will be performed in one of two ways 1) by the developer with a witness from the testing lab, or 2) by the testing lab itself. The entropy source shall contain an interface that enables access to raw bits from the noise source and conditioned outputs from the conditioning component (if utilized). This interface shall consume the noise source outputs (i.e., these outputs shall not be used for anything else once received by the interface). The interface shall be accessible during validation testing but may be disabled, otherwise.
- Data **shall** be collected from the noise source and conditioning component (if available) under normal operating conditions (i.e., when it is reasonable to expect entropy in the outputs).
- Data collected from the noise source for validation testing shall be raw, digitized, but otherwise unprocessed, sample values. NIST will provide guidance as to the appropriate format of the data for input to the validation tests.
- One long dataset of *at least* 1,000,000 consecutive sample values obtained directly from the noise source (i.e., raw and unprocessed samples) **shall** be collected for validation³.
- If a non-approved conditioning component is used, one long dataset of *at least* 1,000,000 consecutive conditioned output values **shall** be collected for validation. Note that the data collected from the noise source for validation may be used as input to the conditioning component for the collection of conditioned output values.
- For sample values consisting of more than a single bit, the developer **shall** provide the tester with an ordered ranking of the bits in the sample values (see Section 7.2).

Note that some tests will divide a dataset into multiple subsets of sample values; these subsets will be called "data subsets".

2. Validation Testing:

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- The continuous health tests **shall** be verified; the tester will verify that the implemented tests detect the failure conditions detected by the Repetition Count Test and Adaptive Proportion Test (See Section 6.5.1.2).
- The tests in Section 9.0 will be run on all samples (noise source and non-approved conditioning component output) submitted for testing; all data collected will be tested as defined in Section 8.0.

³ Providing additional data beyond what is required will result in more accurate entropy estimates. Lack of sufficient data for the tests in Section 9.0 yields lower entropy estimates due to the necessity of mapping down the output values (see Section 7.2). It is recommended that, if possible, more data than is required be collected for validation. However, it is assumed in subsequent text that only the required data has been collected.

- The developer **shall** indicate whether the noise source produces IID data or non-IID data. This claim will be used in determining the test path followed during validation. A claim of full-entropy will be interpreted as an IID claim.
- The min-entropy estimate generated by the tests in Section 9.0 will be the value at which the entropy source is validated. This entropy estimate will be in terms of min-entropy per sample.
- Full-entropy will be credited to an entropy source only after passing the tests for IID data in this Recommendation (see Sections 9.1 and 9.2).
- The tester will test all data as specified in Section 8.0, and will examine all documentation and theoretical justifications submitted by the developer.
- 3. Documentation for Validation Testing (not for general consumption):
 - The developer **shall** provide documentation that describes the operation of the entropy source to include how it works, how entropy is produced, and how to obtain data from within the entropy source for testing purposes (i.e., from the noise source and, if present, the conditioning component).
 - Documentation **shall** be provided so that the lab or vendor can perform (or replicate) the collection process at a later time, if necessary. The collection process **shall not** require advanced knowledge of the source or intrusive actions that may alter the behavior of the entropy source (e.g., drilling into the device).
 - Documentation **shall** provide a technical argument for why the noise source can support a defined entropy rate. This can be in broad terms of where the unpredictability comes from and a rough description of the behavior of the noise source (to show that it is reasonable to assume the behavior is stable).
 - Documentation **shall** describe the conditions under which the entropy source is claimed to operate correctly (e.g., temperature range, voltages, system activity, etc.). Analysis of the entropy source's behavior at the edges of these conditions **shall** be documented, along with likely failure modes.
 - A description of the health tests and the rationale for implementing those tests
 shall be included. The developer shall provide source code for any tests
 implemented as an alternative or in addition to those listed in this
 Recommendation.
 - The developer **shall** provide a description of the output space of the noise source, including its size, and **shall** specify the sample size from the noise source a fixed quantity for a given noise source.
 - For entropy sources containing a conditioning component, a description of the conditioning component **shall** be provided that includes specification of the size of the output blocks from the conditioning component.

7.2 Dealing with the Data Requirement for Noise Sources with Large Output Spaces

It is often the case that the data requirements for a test on noise source samples depend on the number of possible different bitstrings from the source (i.e., the output space). For example, consider two different noise sources, A and B. Source A outputs four-bit samples, and thus has a possible total of $2^4 = 16$ different outputs. Source B outputs 32-bit samples, for a possible total of 2^{32} different outputs.

In many cases, the variability in output that contributes to the entropy in a sample may be concentrated among some portion of the bits in the sample. For example, consider a noise source that outputs 32-bit high-precision clock samples that represent the time it takes to perform some system process. Suppose that the bits in a sample are ordered in the conventional way, so that the lower-order bits of the sample correspond to the higher resolution measurements of the clock. It is easy to imagine that in this case, the low-order bits would contain most of the variability. In fact, it would seem likely that some of the high-order bits may be constantly 0. For this example, it would be reasonable to truncate the 32-bit sample to a four-bit string by taking the lower four bits, and perform the tests on the four-bit strings. Of course, it must be noted that in this case, a maximum of four bits of min-entropy per sample could be credited to the noise source.

The description below provides a method for mapping the n-bit noise source samples, collected as specified in Section 7.1, to strings of bit-length, m, where $n \ge m$. The resulting strings can be used as input to tests that may have infeasible data requirements if the mapping were not performed. Note that after the mapping is performed, the maximum amount of entropy per n-bit sample is m bits.

In extreme cases, it is possible that there exists some dependency in the samples that is controlled by the bits that have been discarded. If this is the case, any testing performed to validate the entropy estimate of the processed samples may result in an over-estimate of the entropy. To minimize this possibility, the mapping technique will not be performed unless the sample bit-length is greater than can be handled by a particular test.

Given a noise source that produces n-bit samples, where n exceeds the bit-length that can be handled by the test, the developer **shall** provide the tester with an ordered ranking of the bits in the n-bit samples. The rank of '1' **shall** correspond to the bit assumed to be contributing the most entropy to the sample, and the rank of n **shall** correspond to the bit contributing the least amount. If multiple bits contribute the same amount of entropy, the ranks can be assigned arbitrarily among those bits. The following algorithm, or its equivalent, **shall** be used to assign ranks.

Input: A noise source and corresponding statistical model with samples of the form $X = x_1 x_2 \dots x_n$, where each x_i is a bit.

Output: An ordered ranking of the bits x_1 through x_n , based on the amount of entropy that each bit is assumed to contribute to the noise source outputs.

- 1. Set $S = \{x_1, x_2, ..., x_n\}$.
- 2. For i = 1 to n:

- a. Choose an output bit x_j such that no other bit in S is assumed to contribute more entropy to the noise source samples than x_i .
- b. Set $rank(x_i) = i$.
- c. Set $S = S \{x_j\}$.

Given the ranking, n-bit samples are mapped to m-bit strings by simply taking the m-bits of greatest rank in order (i.e., bit 1 of the m-bit string is the bit from an n-bit sample with rank 1, bit 2 of the m-bit string is the bit from an n-bit sample with rank 2, ... and bit m of the m-bit string is the bit from an n-bit sample with rank m).

Note that for the tests in Section 9.0, a reference to a sample in the dataset will be interpreted as a reference to the m-bit string of the sample when the test necessitates processing the dataset as specified in this section.

8.0 Entropy Source Testing Strategy

8.1 General Noise Source Entropy Testing Strategy

The most basic requirement for any entropy source is estimating the min-entropy correctly. A min-entropy estimate for the entropy source is calculated from the data submitted for testing, as defined in Section 7.1. As shown in Figure 3, the test track is initially influenced by the developer's claim that the data source does or does not produce IID data. Both tracks result in a min-entropy estimate, but use different information to determine the entropy in a dataset, based upon whether or not the data is IID. Claims for full-entropy imply an entropy source produces IID data; any claim for full-entropy will be interpreted as an IID claim.

- 1. If the data is claimed to be IID, a full set of shuffling and statistical tests is run on the data to verify that the data is IID (see Section 9.1); the claim is verified if there is no evidence that the data is not IID.
- 2. If the results from the tests in Section 9.1 verify that the data is IID (via a lack of evidence to the contrary), the min-entropy of the noise source is estimated using the tests in Section 9.2. This estimate will be used as the validated min-entropy estimate for a noise source that produces IID data.
- 3. Alternatively, if there is no IID claim or if the tests in Section 9.1 do not support such a claim, a set of five conservative entropy tests are performed on the non-IID data to obtain the min-entropy estimate. The five tests for non-IID data in Section 9.3 will result in the calculation of five different entropy estimates. By selecting the minimum of all estimates calculated by the tests, a worst-case estimate of the entropy is obtained, and this conservative estimate will be used as the min-entropy estimate for a noise source that does not produce IID data.
- 4. Following the generation of an entropy estimate, the datasets are subjected to the sanity checks defined in Section 9.4. These tests are designed to discover major failures in the design and gross overestimates of entropy by the test suite. Failure

to pass the sanity checks means that the entropy source fails testing. Entropy will not be credited to that entropy source.

At this point, if the entropy source does not include a conditioning component, given that the entropy source components pass the tests, the entropy source will be validated at the determined min-entropy per noise source sample. Otherwise, see Section 8.2.

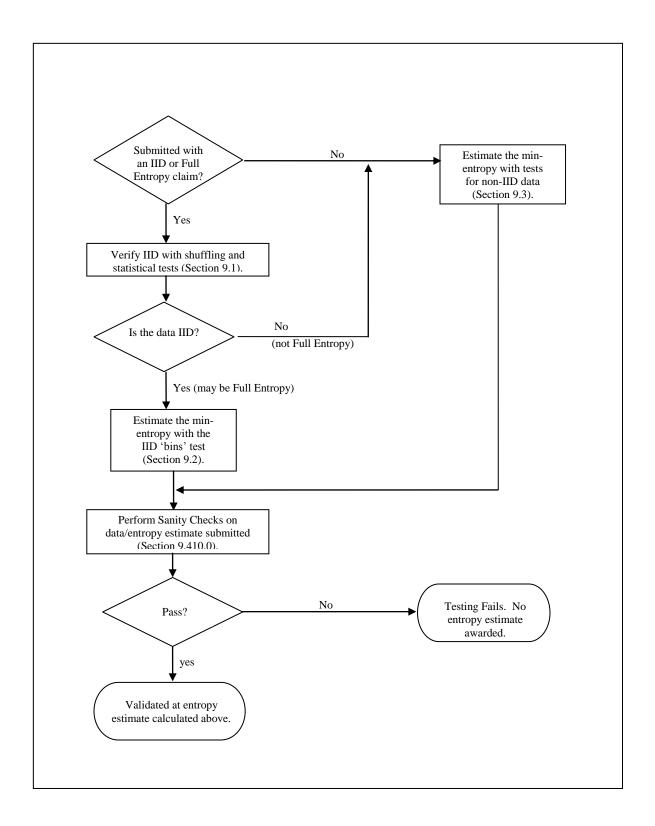


Figure 3: Flowchart Depicting the Entropy Testing Strategy

8.2 Entropy Source Testing Strategy for Conditioned Output

There are various methods for designing a conditioning component for an entropy source. One such method involves using an **approved** cryptographic algorithm/function to condition the noise source outputs. If an **approved** algorithm, discussed in Section 6.4.1, is used as the conditioning component, validation testing on the output from the conditioning component using the appropriate tests in Section 9.0 will not be performed⁴. If a non-approved algorithm is used as the conditioning component, validation testing on the output from the conditioning component using the tests in Section 9.1 will be performed. Any conditioned output must be IID.

- 1. If a conditioning component is implemented in the entropy source, use the results of noise source testing to determine the amount of entropy provided in each input to the conditioning component (i.e., the amount of entropy in the input is the assessed amount of entropy per sample from the noise source times the number of samples provided for the conditioning component input).
 - a. If the conditioning component is **approved**, then:
 - i. Given assurance of correct implementation of the **approved** algorithm, the entropy estimate for each output of the conditioning component is min(*outlen*, *entropy_in*), where *outlen* is the length of the output from the conditioning component, and *entropy_in* is the amount of entropy per bit in the input to the conditioning component. Note that it is acceptable to truncate the cryptographic output. If this is done, the entropy estimate is reduced to a proportion of the output (e.g., if there are 6 bits of entropy in an 8 bit output and the output is truncated to 6 bits, then the entropy is reduced by ½ to 4.5 bits).
 - ii. If validation testing of the **approved** algorithm indicates that it has not been implemented correctly, the conditioning component will be treated as not approved.
 - b. If the conditioning component is not approved, then:
 - i. Determine the input/output ratio, *R*. Most conditioning functions will take in more bits than they output. In some cases, the ratio of input to output bits will be fixed. If this is the case, the input/output ratio will be determined by simply calculating the number of bits of input needed to produce a given number of output bits. On the other hand, some conditioning components may take an indeterminate number of input bits to produce a given number of output bits (e.g. von Neumann unbiasing, where the number of bits of output depends not only on the number of bits of input, but on the actual values of the input bits.) In this case, the ratio of input bits to output bits

⁴ Note, however, that these algorithms are subject to other validation testing to obtain assurance of correct implementation and obtain their approval rating.

- will be estimated by processing 1,000,000 bits of noise source data through the conditioning component and observing the number of bits of output.
- ii. Run the tests in Section 9.1 on the output of the conditioning component. Any conditioned output must be IID; a full set of shuffling and statistical tests is run on the data to verify that the data is IID. The sample size of the conditioned output is the size of the output space of the non-approved conditioning component (e.g., if MD5 is the conditioning component, the sample size is 128 bits).
 - a. The claim is verified if there is no evidence that the data is not IID and testing continues.
 - i. The min-entropy of the conditioned output is estimated using the test in Section 9.2.
 - ii. Let S be the entropy estimate for the noise source (i.e. the number of bits of entropy per bit of noise source output.) as determined by the noise source validation tests. Let E be the entropy estimate for the conditioned output values, and let R be the input/output ratio of the conditioning component. Since the conditioning component cannot increase the entropy, it must be the case that $S/R \ge E$. If this condition is not met, the entropy estimate E will be adjusted to be equal to S/R.
 - b. If the tests in Section 9.1 do not support the IID claim, then the entropy source fails validation, and testing is terminated.
- iii. Following the generation of an entropy estimate, the data is subjected to the sanity checks defined in Section 9.4. These tests are designed to discover major failures in the design and gross overestimates of entropy by the test suite. Failure to pass the sanity checks means that the entropy source fails testing. Entropy will not be credited to that entropy source.

At this point, given that the conditioned output is found to be IID and the components have passed the sanity checks, the entropy source will be validated at the min-entropy per conditioned output, *E*, computed above.

8.3 Entropy Source Testing Strategy for Full Entropy Sources

Claims for full-entropy imply that a noise source or an entropy source produces IID data; any claim for full-entropy will be interpreted as an IID claim. There are two basic options for full-entropy: full-entropy with no conditioning component, and full-entropy through implementation of an **approved** conditioning component. Entropy sources that implement a non-approved conditioning component will not be validated as full-entropy sources.

1. If full entropy is claimed, the data must be IID. A full set of shuffling and statistical tests is run on the data to verify that the data is IID (see Section 9.1).

- a. If the noise source passes the IID tests in Section 9.1 (i.e., there is no evidence that the data is not IID), then testing continues. The min-entropy of the noise source is estimated using the tests in Section 9.2.
 - i. For full-entropy sources with no conditioning component: Credit for full-entropy will be given only if the data is verified to be IID, and a full-entropy estimate is produced by the tests in this Recommendation.
 - ii. For full-entropy sources with an **approved** conditioning component: Credit for full-entropy will be given only if the data is verified to be IID, and the noise source input used to derive the *W*-bit full entropy conditioned output has at least 2*W* bits of min-entropy (see Section 6.4).
- b. If the noise source does not pass the IID tests in Section 9.1, then full entropy is not provided and the entropy source will not be validated as a full-entropy source. Validation may continue, however, using the non-IID path.
- 2. Following the generation of an entropy estimate, the datasets are subjected to the sanity checks defined in Section 9.4. These tests are designed to discover major failures in the design and gross overestimates of entropy by the test suite. Failure to pass the sanity checks means that the entropy source fails testing. Entropy will not be credited to that entropy source.

At this point, given that the entropy source components have passed the tests, the entropy source will be validated at the determined min-entropy per sample.

8.4 Entropy Source Testing Strategy for the Health Test Component

Entropy sources that do not implement the Repetition Count Test and the Adaptive Proportion Test **shall** include alternative continuous tests that detect the same failure conditions. The tester will determine the equivalence of the alternative test(s) as described in Section 10.0.

Submitters of entropy sources for validation testing are required to provide a dataset of at least a million samples drawn from their noise source for validation testing. The testing of the submitter's alternative test(s) for equivalent functionality also requires a dataset; the same dataset may be used for both noise source validation testing and the testing of equivalent functionality of the continuous health tests.

The tests work as follows:

1. A dataset, *D*, taken from the noise source is modified to simulate a particular kind of failure that the Repetition Count or Adaptive Proportion Test will detect with very high probability. Note that a different simulated failure is used (and thus a different altered dataset is created) for each test, although the same "original" dataset may be used.

2. The alternative test(s) is applied to this modified dataset, D'. If the simulated failure is detected, then the alternative test is assumed to provide equivalent functionality.

If these tests for equivalent functionality fail, then the requirement on the health test component is not met and the entropy source will not be validated.

9.0 Tests for Determining Entropy Provided by Entropy Sources

One of the essential requirements of an entropy source is the ability to reliably create random outputs. To ensure that sufficient entropy is input to a DRBG (see [SP 800-90C] for DRBG constructions), the amount of entropy produced per noise source sample must be determined. This Section describes generic tests that will be used to test the noise source and, when non-approved methods are used, the conditioning component as well (see Section 8.2).

The tests described in this Section are appropriate for a wide range of noise sources. Because these tests are generic, they are aimed at catching serious problems and are not meant to address all possible types of sources or all failure conditions.

The test descriptions in this Section are written for an accredited testing laboratory, although the tests are also useful for entropy source developers.

9.1 Determining if the Data is IID

9.1.1 General Discussion

This section describes tests appropriate for a wide range of noise sources and non-approved conditioning components in which each sample is drawn from the same distribution, and its probability of occurrence is independent of any other value sampled. A noise source or conditioning component that meets this requirement is known as IID (independent and identically distributed). These tests are designed to find evidence that the data is IID by testing the dataset against the hypothesis that the distribution of samples is IID. These tests are used as a check on the validity of the developer's claim that an IID source has been submitted; the testing consists of the shuffling tests defined in Section 9.1.2, and the statistical tests defined in Section 9.1.3. If the tests do not disprove the IID claim (i.e., the dataset passes the IID testing), further testing continues under the assumption that the noise source outputs IID data (see Figure 3). A failure of any of the shuffling or statistical tests in Section 9.1 results in a cessation of IID testing and a switch to tests for non-IID data (see Section 9.3).

9.1.2 Shuffling Tests on Independence and Stability

Given the null hypothesis that the samples follow an IID distribution, a shuffled version of a dataset should be just as likely to have occurred as the original dataset that was produced. The original dataset's test score is expected to be drawn from the same distribution as the scores of the shuffled datasets; an original dataset test score of unusually high or low rank

(see Step 2c below) is expected to occur very infrequently. However, if the null hypothesis is not true (i.e., the samples do not follow an IID distribution), then some test scores may be very different for the original and shuffled datasets.

A dataset created as specified in Section 7.1 will be divided into ten non-overlapping data subsets of equal size, i.e., for a dataset consisting of N samples, each data subset would be

 $\left\lfloor \frac{N}{10} \right\rfloor$ samples in length. Each of these data subsets will be tested to determine if the samples follow an IID distribution.

Shuffling tests detect a deviation of the noise source or conditioning component distribution from independent and stable behavior using the following strategy:

- 1. Several statistical scores are calculated. Certain behavior is not consistent with the expected model of an independent, stable distribution for the samples and is expected to be associated with unusually low or high values for the test scores. The following scores are computed:
 - Compression score: one score per data subset (see Section 9.1.2.1),
 - Over/Under Runs score: two scores per data subset (see Section 9.1.2.2),
 - Excursion score: one score per data subset (see Section 9.1.2.3),
 - Directional Runs score: three scores per data subset (see Section 9.1.2.4),
 - Covariance score: one score per data subset (see Section 9.1.2.5), and
 - Collision score: three scores per data subset (see Section 9.1.2.6).
- 2. The following steps are performed on each of the ten data subsets being tested:
 - a. The scores are computed for the (original) data subset, yielding a vector of *J* scores.
 - b. The following steps are repeated 1,000 times for the data subset:
 - i. The values in the (original) data subset are shuffled (i.e., permuted), using a pseudorandom number generator as specified by the Fisher-Yates shuffle [Knuth].
 - ii. The scores are computed for the shuffled data subset, yielding a vector of J scores, where J is the number of scores for a given test on a single dataset (see step 1 above).
 - iii. The scores are stored in a list.
 - c. For each of the corresponding scores for a data subset (e.g., all the first scores resulting from the directional runs test), the original data subset's score (from step 2a) is ranked, in terms of how it compares to the scores of the shuffled data subsets. For example, if the original data subset's score is lower than the score of all the shuffled data subsets, the rank of the original data subset's score is 1, and the scores for all the other shuffled data subsets would have a higher rank. If the original data subset's score is higher than

the score of all the shuffled data subsets, it has a rank of 1000, and all other scores would have a rank < 1000.

It is possible for many shuffled data subsets to have the same score. When the original data subset has the same score as one or more shuffled data subsets, its score is taken to be the closest one to the median. Given a sorted list L[0...1001] of shuffled data subset scores, and a score for the original data subset, S, the following rule is used:

$$\operatorname{Rank}(S) = \begin{cases} \max(j) \text{ such that } L[j] \leq S & \text{if } L[500] > S \\ 500 & \text{if } L[500] = S \\ \min(j) \text{ such that } L[j] \geq S & \text{if } L[500] < S \end{cases}$$

This rule ensures that only exceptionally high or low scores show up as anomalous in the shuffling tests.

For example, if
$$S = 20$$
, $L[500] = 22$, $L[299] = 19$, $L[300] = 20$, $L[301] = 20$, and $L[302] = 22$, then Rank(S) = 301. If $S = 20$, $L[500] = 18$, $L[599] = 19$, $L[600] = 20$, and $L[601] = 20$, then Rank(S) = 600.

- 3. The ranks are treated as p-values in a two-tailed test. The ten data subsets produce a set of $10 \times J p$ -values for each of the six test types.
- 4. The *p*-values are combined according to the following rules:
 - a. Any rank ≤ 50 or ≥ 950 is noted. Such events have a probability of 10% of happening by chance.
 - b. If eight or more of the original data subsets have a rank ≤ 50 or ≥ 950 on the same test for each score, the source fails.
 - i. If a noise source is being tested, it fails the tests for independence and stability and is not considered to be IID. The testing of the noise source will proceed along the alternate test path (see Section 9.3).
 - ii. If a non-approved conditioning component is being tested, the entropy source fails validation.

9.1.2.1 Compression Score

General-purpose compression algorithms are extremely well adapted for removing redundancy in a character string, particularly involving commonly recurring subsequences of characters. The compression score of a data subset (original or shuffled) measures the length of that data subset after the samples are encoded into a character string and processed by a general-purpose compression algorithm.

The compression score is computed as follows:

1. The samples in the data subset are encoded as a character string containing a list of values separated by commas, e.g., "144,21,139,0,0,15".

- 2. The character string is processed with the [BZ2] compression algorithm.
- 3. The score returned is the length of the compressed string, in bytes.

9.1.2.2 Over/Under Runs Scores (Two Scores)

The median value of a data subset is computed, and all sample values not equal to the median are identified as either above it or below it. Long runs of samples above or below the median are then expected to be relatively rare if the outputs are independent and stable. Similarly, the number of runs of samples that are above or below the median is a measure of whether a given sample is at all dependent on its neighbors, and whether the distribution is stable.

This test is applicable for any data subset whose samples take on numeric or ordinal values. However, for testing simplicity, the tests should be run even if the data is non-numeric or non-ordinal.

Each data subset (original and shuffled) is used to produce a temporary data subset, consisting of only the values -1 and +1. Sample values less than the median of the original data subset are assigned a -1 value in the temporary data subset; those greater than the median are assigned a +1 value, and those equal to the median are omitted from the temporary data subset. The longest run and number of runs in the temporary data subset are then noted, yielding two scores for each of the original and shuffled data subsets.

The scores are computed as follows:

- 1. The data subset is used to compute a median for the values in this data subset. If the data subset is binary, then the median is 0.5.
- 2. A temporary data subset is constructed as follows for each of the original and shuffled data subsets. For each element in the data subset:
 - a. If the element is larger than the median, append a +1 to the temporary data subset.
 - b. If the element is smaller than the median, append a -1 to the temporary data subset.
 - c. If the element is the same as the median, do not append anything to the temporary data subset.
- 3. Determine the longest run of -1 or +1 in the temporary data subset, and let the length of this longest run be the first score.
- 4. The number of runs of -1 and +1 values in the temporary data subset is reported as the second score.

For example, assume that the original data subset consists of seven samples $\{5, 15, 12, 1, 13, 9, 4\}$; the median for this data subset is 9. The temporary data subset on this original data subset is $\{-1, +1, +1, -1, +1, -1\}$; note that the entry for 9 is omitted, by rule 2c. The runs are (-1), (+1, +1), (-1), (+1), and (-1). The longest run has a length of 2 (the first score), and the number of runs is 5 (the second score).

9.1.2.3 Excursion Score

The excursion score detects when a sequence of extremely high or low values clusters together in the data subset. This indicates a distribution that may fail to be stable or independent. Both high and low excursion scores are of interest. High scores represent clusters of unusually high/low values occurring together; low scores represent some process that prevents unusually high/low values from clustering together even as often as would be expected by chance.

The excursion score is meaningful if the average value of the samples is meaningful (e.g., an average can be computed on the dataset values). In a large number of cases in which the sample value is a count or a digitized value, the average of the dataset values can be computed. However, for test simplicity, the tests should be run even if an average cannot be computed.

The excursion score is a measure of how far the running sum of sample values deviates from its expected value at each point in the data subset. If the data subset is s_0 , s_1 , s_2 ,..., and the mean of the sample values is μ , then the excursion at position i is $s_0+s_1+...+s_i-i\times\mu$. The score returned is the maximum absolute value of any excursion in the data subset.

The score is computed as follows, where μ = the mean of the values in the data subset.

1. For
$$j = 1$$
 to $\left\lfloor \frac{N}{10} \right\rfloor$ (where $\left\lfloor \frac{N}{10} \right\rfloor$ is the length of the data subset in samples):

 d_i = the absolute value of (the sum of the first j samples – $i \times \mu$)

2. The score returned is the largest of the d_i values.

For example, if the data subset is
$$\{2, 15, 4, 10, 9\}$$
, then $\mu = 8$. $d_1 = |2-8| = 6$; $d_2 = |(2+15) - (2\times8)| = 1$; $d_3 = |(2+15+4) - (3\times8)| = 3$; $d_4 = |(2+15+4+10) - (4\times8)| = 1$; $d_5 = |(2+15+4+10+9) - (5\times8)| = 0$. Therefore, the score is 6, the highest value for d_i .

9.1.2.4 Directional Runs Scores (Three scores)

Many physical processes are best understood in terms of their derivatives. If the first derivative alternates signs between samples, then a large number of short directional runs will be noted.

Each data subset (original and shuffled) is used to generate a temporary data subset that is one element shorter than the original (or non-temporary) data subset. The temporary data subset contains an indication of whether the first value in each pair of elements is less than, equal to, or greater than the second element in the pair. If the first element is less than the second element, then a +1 is appended to the temporary data subset; if the two elements are equal, then a 0 is appended to the temporary data subset; otherwise the first element is greater than the second element, and a -1 is appended to the temporary data subset. For

example, if the data subset is $\{24,19,33,4,4,11\}$, then the temporary data subset would be $\{-1,+1,-1,0,+1\}$. Three scores are then computed on this temporary data subset:

- 1. The total number of runs (in this case, 0 values do not break a run, e.g., a run of $\{...+1, 0, 0, +1...\}$ is considered to be a continuous run of +1 values);
- 2. The length of the longest run; for this count, leading zeroes are ignored, however, zeroes do not break a run (i.e., runs must start with −1 or +1; 0 values do not break a run); and
- 3. The number of -1 or +1 values in the temporary data subset, whichever is greater (e.g., if there are 33 occurrences of -1, and 35 occurrences of +1, then the score is 35).

These scores can detect a wide variety of ways in which the physical processes underlying a noise source cause the distribution of samples to not be stable or independent. Both high and low values of all three scores are of interest.

The scores are computed as follows, where s_i is the i^{th} element of the data subset, and "hamming_weight(s_i , s_{i+1} , ..., s_{i+n})" is defined as the number of ones in the sequence s_i , s_{i+1} , ..., s_{i+n} :

- 1. The temporary data subset *temp* is produced from the data subset as follows:
 - a. If the input is not binary:

For i = 0 to (the length of original data subset) -2:

If
$$s_i < s_{i+1}$$
, then $temp_i = 1$
Else if $s_i > s_{i+1}$, then $temp_i = -1$

Else $temp_i = 0$.

b. If the input is binary:

Data subsets containing binary data first require processing in which the bits are combined into bytes. Then, a new data subset is created from the Hamming weights of the successive bytes and the temporary data subset is generated from this.

For i = 0 to the (length of original data subset)/8 -1:

$$W_i$$
= hamming_weight(s_i ,..., s_{i+7})

For i = 0 to (length of sequence *W*)-2:

If
$$W_i < W_{i+1}$$
 then $temp_i = 1$
Else if $W_i > W_{i+1}$ then $temp_i = -1$

Else $temp_i = 0$

2. Calculate the scores on the temporary data subset.

Example of a non-binary data subset $\{2, 2, 2, 5, 7, 7, 9, 3, 1, 4, 4\}$: The temporary data subset is $\{0, 0, +1, +1, 0, +1, -1, -1, +1, 0\}$. There are three runs: (+1, +1, 0, +1), (-1, -1) and (+1, 0), so the first score is three. The longest run has a length of four (the second score). Since there are four "1" values, and two "-1" values, the third score is four.

Example of a binary data subset: The bytes produced by step 1b (represented as hexadecimal values) are $\{a3, 57, 3f, 42, bd\}$. The hamming weights are $\{4, 5, 6, 2, 6\}$. The temporary data subset is $\{+1, +1, -1, +1\}$. There are three runs: (+1, +1), (-1) and (+1), so the first score is three. The longest run has a length of two (the second score). Since there are three "+1" values and one "-1" value, the third score is three.

9.1.2.5 Covariance Score

Many of the likely ways that a noise source can fail to be IID involve dependencies between nearby samples. The chi-square test of independence (see Section 9.1.3.1), and the compression score (see Section 9.1.2.1) are effective at detecting repeating patterns of particular values (e.g., strings of sample values that occur more often than would be expected by chance if the noise source were IID), but will not, in general, detect relationships between the numeric values of successive samples (e.g., high sample values usually being followed by low sample values). The covariance score will detect such relationships.

The behavior of the covariance score is well-understood for bivariate normal distributions. However, any linear relationship between the successive pairs of values will affect this score, and so the covariance is expected to be different (larger or smaller) for the original data subsets than for the shuffled data subsets, if such a relationship exists.

The covariance of two variables is defined as the expected value of their product, minus the product of their expected values. The covariance is a common statistical measure of whether two variables have a linear relationship. The covariance score is computed over each pair of the data subset S, so that s_0 is paired with s_1 , s_1 with s_2 , etc.

The score is computed as follows, where s_i is the i^{th} element of the data subset, numbered from zero, and there are a total of $\left| \frac{N}{10} \right|$ samples in the data subset:

- 1. count = 0
- 2. μ = the mean of s_0 , s_1 , s_2 , ..., $s_{N/10-1}$.
- 3. For i = 1 to $\left\lfloor \frac{N}{10} \right\rfloor$:

$$count = count + (s_i - \mu)(s_{i-1} - \mu)$$

4. Score =
$$\frac{count}{\left\lfloor \frac{N}{10} \right\rfloor - 1}$$
.

For example, if the data subset is $\{15, 2, 6, 10, 12\}$, then there are five samples in the data subset, and the mean μ is 9. For i=1, count = (2-9)(15-9) = -42; for i=2, count = -42 + (6-9)(2-9) = -21; for i=3, count = -21 + (10-9)(6-9) = -24; for i=4, count = -24 + (12-9)(10-9) = -21. The score is (-21/4) = -5.

9.1.2.6 Collision Score (Three scores)

A natural measure of how much entropy is in a variable comes from the number of times it must be sampled before the first duplicate value ("collision") occurs. A source that is IID can be expected to have the same behavior with respect to the number of samples that occur before a collision occurs as its shuffled variants. By contrast, a source in which the probability of the most likely value changes over time is likely to require fewer samples to find a collision in its unshuffled outputs than in its shuffled outputs.

The collision score measures the number of successive sample values until a duplicate (a "collision") is seen. A single data subset will normally have many times this number of values, and so many such collisions can be sought in different parts of the data subset.

Starting at the beginning of the data subset, samples are examined until a duplicate is found. The number of samples examined is noted, and then a new search for duplicates starts at the next element in the data subset. This continues until the whole data subset has been checked. The set of numbers of samples examined is then used to compute three scores: the smallest number, the average, and the largest number.

In the case of binary data, a data subset consisting of binary data is converted into a sequence of 8-bit bytes before being subjected to this test, so that each sequence of eight bits in the original data subset becomes one byte in the modified data subset. The modified data subset is then subjected to the above process to compute collision scores. Note that both the (original) data subset and each shuffled data subset are separately modified by this

process. Also note that the length of this modified data subset is $\left| \frac{N}{80} \right|$ because of this

process, whereas the length of the original binary data subset and data subsets that do not consist of binary data have a length of $\left| \frac{N}{10} \right|$.

The scores are computed as follows:

- 1. *Counts* is a list of counts of samples needed to see a duplicate; the list is initially empty.
- 2. pos = 0
- 3. While *pos* < (the length of the data subset):
 - a. Find the smallest j such that s_{pos} .. s_{pos+j} contains one duplicate value.
 - i. If no such *j* exists, break out of the while loop.
 - b. Add *j* to the list of *Counts*.
 - c. pos = pos + j + 1

4. Return the following values as scores: the minimum value in the *Counts* list, the average of all values in the *Counts* list, and the maximum value in the *Counts* list.

For example, if the data subset is $\{2, 1, 1, 2, 0, 1, 0, 1, 1, 2\}$, the length of the data subset is 10. If the first "2" is at position 0, then the first collision occurs when j = 2 (i.e., samples 1 and 2 are both ones). Disregarding the first three samples in the data subset, the next sequence to be examined is $\{2, 0, 1, 0, 1, 1, 2\}$, the collision for this new sequence occurs when j = 3 (i.e., samples 1 and 3 of this second sequence are both zeros). The third sequence to be examined is $\{1, 1, 2\}$; the collision for this third sequence occurs when j = 1 (i.e., samples 0 and 1 are both ones). The final sequence to be examined is $\{2\}$, for which there are no collisions. The counts collected for this test occur when j = 2, j = 3, and j = 1. The first score returned is 1 (the minimum count value); the second score is 2 (the average of the count values); the third score is 3 (the maximum value of the count values).

9.1.3 Specific Statistical Tests

9.1.3.1 Chi-Square Test

Sample values are limited to a fixed range of possibilities. If the requirements on the noise source and non-approved conditioning component to be IID are met, then the distribution of these values can be seen as an independent category distribution (a multinomial distribution, in which the individual sample values have no meaningful relationship.) The chi-square test can be used to test whether a particular dataset fits a particular multinomial distribution.

Chi-square tests can be used to check whether a dataset of samples follows some expected distribution, and also whether two or more datasets follow the same distribution. It should be noted that there are some distributions for which a chi-square test cannot be performed because the data requirements are too great. This occurs when the output samples have a large number of possible values, none with very high probability. In these cases, two options are available: 1) more data than required in Section 7.1 should be submitted (or collected) such that the test can be executed, or 2) if additional data cannot be obtained, the chi-square test can be skipped, since it will not be possible to perform the test. If the test is not performed due to lack of data, the rest of the validation testing will continue as specified.

Two different types of chi-square tests are employed for validating a noise source and non-approved conditioning components: a test for independence, and a test for goodness-of-fit. The independence test attempts to discover dependencies in probabilities between successive samples in the (entire) dataset submitted for testing as specified in Section 7.1 (see Section 9.1.3.1.1 for non-binary data and Section 9.1.3.1.3 for binary data); the goodness-of-fit test attempts to discover a failure to follow the same distribution in the ten data subsets produced from the (entire) dataset submitted for testing (see Section 9.1.3.1.2 for non-binary data and Section 9.1.3.1.4 for binary data).

9.1.3.1.1 Testing Independence for Non-Binary Data

For this test, the (entire) dataset submitted for testing, as defined in Section 7.1 is used to estimate the probability of each possible value occurring (i.e., each value that a single sample could assume). The dataset is used to estimate the probabilities for each possible value of x that could occur. The occurrences of pairs of such values in the dataset are then checked against their theoretical probability of occurrence.

Let $p(x_i)$ equal the estimated probability that value x_i will occur in any given sample. Let List1 contain a list of (x_i, x_j) pairs that is expected to occur at least five times, and List2 contain a list of (x_i, x_j) pairs that is expected to occur less than five times. Let $E(x_i, x_j)$ be the expected number of occurrences for the (x_i, x_j) pairs in List1, and E_{other} be the total of the expected number of occurrences of the entries in List2.

Informally, the chi-square test for independence is carried out as follows:

- 1. Determine $p(x_i)$ for each possible output value in the dataset by counting the number of occurrences of each x_i , and dividing by the length of the dataset.
- 2. Determine pmax = the maximum probability that occurs in the dataset.
- 3. Let N = the number of samples in the dataset.
- 4. Count the number of parameters to be estimated. Let q = 1; start with 1 because the catch-all category probability will be estimated.
 - a. For each $p(x_i)$:

If
$$p(x_i)pmax \ge 5/N$$
, let $q = q + 1$.

- q now contains the number of parameters that are estimated in this test. Now, determine the number of bins.
- b. If q=1, then the test halts with no result--there are no pairs with high enough probability to run the test on. This means that the dataset is too small to run this test on this source distribution.
- 5. The sets of pairs of values that are expected to occur at least five times or less than five times are constructed, as follows:
 - a. Set *List1* and *List2* to empty sets.
 - b. $E_{other} = 0$.
 - c. For each possible pair of values (x_i, x_i) , including (x_i, x_i) :

If
$$p(x_i)p(x_j)N \ge 5$$
:

- i. Add the (x_i, x_i) pair to List1.
- ii. Let $E(x_i, x_i) = p(x_i)p(x_i)N$.

Else:

- iii. Add the (x_i, x_i) pair to List2.
- iv. $E_{other} = E_{other} + p(x_i)p(x_i)N$.

- 6. Verify that enough degrees of freedom are obtained to run the test. If not, this test has no result; the test may be omitted or more data may be requested.
 - a. Let w = the number of pairs that appear in *List1*.
 - b. If w+1-q < 1: halt the test with no result there is not enough data to run the test properly.
- 7. Compute the chi-square score:
 - a. X1 = 0.
 - b. For each pair (x_i, x_i) in *List1*:
 - i. $Obs(x_i, x_j)$ = the number of occurrences of this pair of values in the dataset.

ii.
$$XI = XI + (E(x_i, x_i) - Obs(x_i, x_i))^2 / E(x_i, x_i)$$
.

- c. X2 = 0.
- d. For each pair (x_i, x_i) in *List2*:
 - i. $Obs(x_i, x_i)$ = the number of occurrences of this pair in the dataset.
 - ii. $X2 = X2 + Obs(x_i, x_i)$.
- e. $X = XI + (X2 E_{other})^2 / E_{other}$

X is a chi-square value. Compare X with the 0.001 cutoff value for a chi-square with w+1-q degrees of freedom. If X is larger than this cutoff value, the dataset fails the test; this is strong evidence that sample values in the sequence are not independent. A high chi-square score indicates a lack of independence, and a p-value less than 0.001 causes this test to fail

9.1.3.1.2 The Test for Goodness of Fit for Non-Binary Data

For this test, the (entire) dataset, as defined in Section 7.1, is used to estimate the expected number of occurrences of each sample value in each of the ten subsets of the dataset. These values are then used to test the hypothesis that the values have the same probabilities of occurring in each of the ten data subsets.

Let x_i be a possible output (i.e., a possible sample). Let $E(x_i)$ = the expected number of occurrences of x_i in any one data subset. Let List3 and List4 be lists of the values of x_i . Let E_{other} = the sum of the $E(x_i)$ for each x_i in List4.

Informally, the chi-square test for goodness of fit is carried out as follows:

- 1. Determine $E(x_i)$ for each x_i . This is the total number of occurrences of x_i in the entire dataset, divided by ten.
- 2. Let *List3* be the list of values of x_i , such that $E(x_i) \ge 5$.
- 3. Let *List4* be the list of values of x_i , such that $E(x_i) < 5$.
- 4. $E_{other} = 0$.
- 5. For each x_i in *List4*:

$$E_{other} = E_{other} + E(x_i)$$
.

- 6. Let XI = 0.
- 7. For each of the ten data subsets:
 - a. Let Obs (x_i) be the observed number of occurrences of x_i in the data subset.
 - b. For each x_i in *List3* (i.e., each x_i that is expected to occur at least five times): $X I = XI + (Obs(x_i) E(x_i))^2 / E(x_i).$
 - c. Obs_{other} = the number of occurrences of values in *List4* in the data subset.
 - d. $X = XI + (Obs_{other} E_{other})^2 / E_{other}$.

The final total value X is a chi-square variable, with 9|L| degrees of freedom, where L is the length of List3, plus 1 (i.e., the number of values with expected value ≥ 5 , plus 1). A p-value of less than 0.001 means that one or more of the ten data subsets do not fit the distribution determined from the (entire) dataset, and the test fails.

9.1.3.1.3 Testing Independence for Binary Data

If the binary source is IID, then each bit appears with the same probability everywhere in the dataset. This means that the probability of each *k*-bit string is the probabilities of each of its successive bits, multiplied together. This test checks to see if these *k*-bit strings have the expected probability over the whole dataset. If nearby bits are not independent, then the expected probabilities of *k*-bit strings derived from bit probabilities will be wrong for the whole dataset, and the chi-square score will be much larger than expected.

This test can be applied to binary data to test the independence of the bits in the dataset. In order to do this, successive bits must be grouped together as follows:

- 1. Let C_0 be the count of zeros in the dataset, and C_1 be the count of ones.
- 2. Let C_x be whichever of those two is smaller. That is, $C_x = \min(C_0, C_1)$.
- 3. Let *N* be the total number of bits in the dataset.
- 4. Let k = 2
- 5. While k < 12 and $(C_x/N)^k > 5/N$:

$$k = k + 1$$

6. k = k - 1

At the end of this process, $2 \le k < 12$. Construct a modified dataset from the dataset as follows:

$$new\ dataset[i] = dataset[ki..(k+1)i-1]$$

That is, each successive *k* bits of the dataset becomes a new element in *new_dataset*. The expected probabilities of each value in the dataset, and a chi-square score are computed as follows:

1. $p = C_1/N$ (the probability of getting a one bit in the dataset).

- 2. S = 0.0.
- 3. For *value* = 0 to 2^k -1:
 - a. $W = \text{hamming_weight}(value)$ (i.e., number of ones in value)
 - b. $prob(value) = p^{W}(1-p)^{k-W}$. (That is, the probability of each value is estimated, based on the bit probabilities.)
 - c. E(value) = prob(value)N/k.
 - d. Let C_{value} = the number of times that *value* appears in *new_dataset*.
 - e. $S = S + (C_{value} E(value))^2 / E(value)$.

The final total value S is a chi-square variable, with 2^k -1 degrees of freedom. Compare S with the 0.001 cut-off value for a chi-square with 2^k -1 degrees of freedom. A high chi-square score indicates a lack of independence; if S is larger than this cut-off value, the dataset fails the test.

9.1.3.1.4 Testing for Stability of Distribution in Binary Data

Given an estimate of the bit probability p for a one over the (entire) dataset, a goodness-of-fit test can be used to verify that the probability is stable across the ten individual data subsets as follows:

- 1. Let *p* be the probability that a bit in the (original) dataset is a one. This is computed as:
 - p = (number of one bits in the dataset/N).
- 2. Let N_d be the length of each of the ten individual data subsets (i.e., $\left| \frac{N}{10} \right|$).
- 3. Let $E_d = pN_d$.
- 4. S = 0.0
- 5. For d = 1 to 10:
 - a. C_d = the number of ones in data subset d.
 - b. $S = S + (C_d E_d)^2 / E_d$.

S is a chi-square variable with 9 degrees of freedom. The test fails if S is larger than the critical value at .001, which is 27.9.

9.1.3.2 Other Statistical Tests

Other statistical tests may be added in the future.

9.2 Estimating the Min-Entropy of IID Sources

Similar to a 'bins' test, this test estimates the entropy provided by an IID source, based on the number of observations of the most common output value. Estimating entropy in an IID source is a simple process: the most common value in the dataset described in Section 7.1 is found and counted. This is used to produce a 99% upper bound on the probability of the most common value, *pmax*, and that upper bound is used to produce a lower bound estimate of min-entropy per sample of the source.

Simply counting the most common value introduces a small bias in favor of more conservative estimates, as it tends to overestimate *pmax* in some distributions. However, in practice, this bias is small enough to have little importance⁵.

It is important to note that the estimate is not meaningful when the source is not IID. The test is performed as follows:

Given a dataset with N samples.

- 1. Find the most common value in the dataset.
- 2. Count the occurrences of that value, and call the result C_{MAX} .
- 3. Let $pmax = C_{MAX}/N$.
- 4. Calculate $C_{BOUND} = C_{MAX} + 2.3\sqrt{Npmax(1 pmax)}$.
- 5. Let $H = -\log_2(C_{BOUND}/N)$.
- 6. Let W be the number of bits in each sample of the dataset (i.e., the size of the sample).
- 7. min(W, H) is the lower-bounded entropy estimate.

For example, if the dataset is $\{0, 1, 1, 2, 0, 1, 2, 2, 0, 1, 0, 1, 1, 0, 2, 2, 1, 0, 2, 1\}$, the most common value is "1", $C_{MAX} = 8$, and pmax = 0.4.

$$C_{BOUND} = 8 + 2.3\sqrt{4.8} = 13.04.$$

 $H = -\log(0.652) = 0.186.$
 $W = 3.$
 $\min(3, 0.186) = 0.186.$

9.3 Estimating the Min-Entropy of non-IID Sources

9.3.1 General Discussion

Many viable noise sources fail to produce independent outputs. Moreover, some sources may have dependencies that are beyond the ability of the tester to address. To derive any utility out of such sources, a diverse and conservative set of entropy tests are required.

⁵ Experimentally, uniform eight-bit random values lose less than a bit from their entropy estimates, while uniform 16-bit random values lose a little more than two bits from their entropy estimates.

Testing sources with dependencies in time and/or state may result in overestimates of entropy instead of underestimates. However, a large, diverse battery of tests minimizes the probability that such a source's entropy is greatly overestimated.

The battery of tests presented in this section will be performed on noise sources determined to be non-IID by the testing performed in Section 9.1, and any noise source submitted for testing without an IID claim⁶. The five tests, each designed to compute a different statistic on the samples, provide information about the structure of the data: collision, collection, compression, Markov, and frequency. While the tests (except for the Markov) were originally designed for application to independent outputs, the tests have performed well when applied to data with dependencies. Given empirical evidence and the confidence level of the tests, their application to non-IID data will produce valid, although conservative, entropy estimates.

9.3.2 Testing Summary

The working assumption for these tests is that a probability distribution describes the output of a random noise source, but that the probability distribution is unknown. The goal of each test is to reveal information about the unknown distribution, based on a statistical measurement. The presented entropy tests define a set of IID probability distributions that contain the unknown distribution; the entropy is conservatively estimated by minimizing over this set of distributions. The five tests fall into two types: the first type bounds the entropy of a noise source, based on a statistical measurement with a prescribed amount of confidence, while the second type constructs a set of probability distributions based on the distance to the measured statistic within a prescribed confidence level.

For the tests defined in this section, a confidence level of 95%, denoted by α , is used; the confidence interval encompasses the true value of the measured statistic 95% of the time.

9.3.3 The Collision Test

9.3.3.1 Test Overview

The collision test measures the mean time to the first collision in a dataset. The goal of the collision statistic is to estimate the probability of the most-likely state, based on the collision times. The test will produce a low entropy estimate for noise sources that have considerable bias toward an output or state (i.e., the mean time until a collision is relatively short), while producing longer mean times to collision results in higher entropy estimates. This test yields a lower bound on the entropy present with a prescribed confidence level when the samples are independent. Dependencies in the sample data may cause an overestimate of the entropy of the data. In practice, a slight overestimate is resolved by selecting the minimum entropy estimate from all the tests as the expected entropy provided by the noise source.

⁶ Any conditioned output must be IID, so the tests in this section will not be performed on conditioning component output (see Section 8.2).

9.3.3.2 Implementation Summary

Given a dataset from the noise source, step through the dataset (i.e., sample by sample) until any observed value is repeated. Record the number of steps to the observed collision. Beginning from that point, step through the remaining samples until another observed value is repeated. Continue this process at least 1000 times until the end of the dataset is reached, generating a sequence of collision times, where the collision time corresponds to the number of samples observed before a collision occurs. The observation of 1000 collisions is dependent on the sample size, and may not be possible for sources with large samples. Given the data requirement specified in Section 7.1, an observation of 1000 collisions in sources with samples larger than 20 bits will not be feasible. For example, a source that produces 32-bit outputs would need approximately 2²⁶ samples to observe 1000 collisions. As an alternative for noise sources with large sample sizes, the method in Section 7.2 for mapping noise source outputs together⁷ (based on a ranking of the bits in the output) may be implemented, or additional data may be collected for testing purposes. This will enable the observation of at least 1000 collision events regardless of the sample size. One of these options will be enforced, based on the data provided, so that the test can be run and 1000 collision events observed.

Once the end of the dataset is reached, calculate the mean collision time of the differences in the sequence of collision times. Then, determine the probability distribution that has the minimum possible entropy for the calculated mean collision time. For this distribution, the min-entropy is calculated and returned as the lower bound on the entropy that is present.

9.3.3.3 Collision Test Details

Given a dataset $\{s_1, s_2, ..., s_N\}$, of noise or entropy source observations.

- 1. Beginning with s_I , step through the dataset until any observed value is repeated; i.e., find the smallest j such that $s_i = s_j$, for some i with $1 \le i < j$.
- 2. Define a sequence t. Set $t_0 = 0$, $t_1 = j$.
- 3. Set v = 1.
- 4. Starting with sample j, step through the remaining samples, s_{j+1} , s_{j+2} , ..., s_N , until there is a k and an l such that $s_k = s_l$, with j < k < l.
- 5. v = v + 1.
- 6. Define $t_v = l$.
- 7. Set j = l.
- 8. Repeat steps 4-7 until the end of the dataset is reached. A sequence $\{t_0, t_1, t_2, ..., t_v\}$ is generated. If v < 1000, the noise source outputs will be mapped down based on the ranking provided, and the data will be retested.

⁷ Note that mapping outputs together will result in potentially smaller entropy estimates than if sufficient data was tested.

9. Calculate the sample mean, μ , and the sample standard deviation, σ , of the differences of collision times, t_i .

$$\mu = \frac{\sum_{i=1}^{v} (t_i - t_{i-1})}{v}$$

$$\sigma = \sqrt{\frac{\sum_{i=1}^{v} (t_i - t_{i-1})^2}{v} - \mu^2}$$

10. Compute the lower-bound of the confidence interval for the mean based on a normal distribution with confidence level α :

$$\bar{\mu} = \mu - \frac{1.96\sigma}{\sqrt{v}}.$$

11. Define a one-parameter family of probability distributions parameterized by p, P_p :

$$P_p(i) = \begin{cases} p & if & i = 0\\ \frac{1-p}{n-1} & otherwise \end{cases}$$

where n is the number of states in the output space.

12. Using a binary search, solve for the parameter p, such that E_{P_p} the expected value of the statistic applied to P_p , equals $\overline{\mu}$.

$$E_{P_p}(S) = pq^{-2}\left(1 + \frac{1}{n}(p^{-1} - q^{-1})\right)F(q) - pq^{-1}\frac{1}{n}(p^{-1} - q^{-1})$$

where

$$q = \frac{1-p}{n-1},$$

and

$$F(1/z) = \Gamma(n+1,z)z^{-n-1}e^{-z}$$
.

13. The min-entropy is the negative logarithm of the parameter, p:

$$min-entropy = -\log_2(p)$$
.

9.3.4 The Partial Collection Test

9.3.4.1 Test Overview

The partial collection test computes the entropy of a dataset based on how many distinct values in the output space are observed; it yields low entropy estimates for output streams that contain a small number of distinct output values, and yields high entropy estimates for output streams that diversify quickly. The partial collection test provides a reasonable estimate for sources with output values that appear with higher probability than others in the output space. An advantage of the partial collection test over the traditional collection test⁸ is that it finishes in finite time, since the test estimates the entropy of a source, given the number of distinct values in a set of samples in the dataset.

It should be noted that the partial collection test will only produce an accurate entropy estimate if the size of the output space is known. For example, consider a noise source that outputs four-bit samples, but only two of those bits are ever influenced/used by the noise source. This reduces the number of possible output values and limits the output space. Instead of $2^4 = 16$ possible values, this source only produces $2^2 = 4$ different values. A search for all 16 possibilities will be fruitless, and the entropy will be greatly overestimated by this test. Therefore, the output space of the noise source or an indication of values that never appear in the output from the noise source **shall** be provided by the developer for validation testing.

Given the data requirement specified in Section 7.1, samples larger than 10 bits will not be feasible. As an alternative for noise or entropy sources with large sample sizes, the method in Section 7.2 for mapping noise source outputs together⁹ (based on a ranking of the bits in the output) may be implemented, or additional data may be collected for testing purposes. Based on the data provided for validation, one of these options will be enforced such that the test can be run and 500 events observed.

9.3.4.2 Implementation Summary

Partition the dataset into non-overlapping subsets of size n (where n is the size of the output space). The partial collection test computes the number of distinct values in each subset of n samples. Once all subsets have been parsed, calculate the mean number of distinct values in each subset of n samples. Then, determine the probability distribution that has the minimum possible entropy for the calculated mean number of distinct values. For this distribution, the min-entropy is calculated and returned as the lower bound on the entropy that is present.

⁸ The traditional collection test measures the expected number of samples that must be generated to produce every possible output, and as such, could potentially never terminate.

⁹ Note that mapping outputs together will result in potentially smaller entropy estimates than if sufficient data was tested.

9.3.4.3 Partial Collection Test Details

Given a dataset $\{s_1, s_2, ..., s_N\}$, of noise or entropy source observations.

- 1. Consider the dataset as v non-overlapping data subsets of length n, where n is the size of the output space (i.e. the number of possible outputs)¹⁰.
- 2. Count the number of distinct values seen in each data subset: T_i is equal to the number of distinct values in subset i.
- 3. Repeat Step 2 until the end of the dataset is reached. If a minimum of 500 events have not been observed, the noise source outputs will be mapped down (see Section 7.2) and the test rerun. Otherwise, continue to Step 4.
- 4. Calculate the sample mean, μ , and the sample standard deviation, σ , of the T_i values.

$$\mu = \frac{\sum_{i=1}^{v} T_i}{v}$$

$$\sigma = \sqrt{\frac{\sum_{i=1}^{v} T_i^2}{v} - \mu^2}$$

5. Compute the lower-bound of the confidence interval for the mean based on a normal distribution with confidence level α :

$$\bar{\mu} = \mu - \frac{1.96\sigma}{\sqrt{v}}.$$

6. Define a one-parameter family of probability distributions parameterized by p, P_p :

$$P_p(i) = \begin{cases} p & if & i = 0\\ \frac{1-p}{n-1} & otherwise \end{cases}$$

7. Using a binary search, solve for the parameter p, such that E_{P_p} the expected value of the statistic applied to P_p , equals the mean $\overline{\mu}$.

$$E_{P_p}(S) = 1 - (1-p)^n + (n-1)(1-(1-q)^n)$$

where

$$q = \frac{1-p}{n-1}.$$

 $^{^{10}}t = \left\lfloor \frac{N}{n} \right\rfloor$; if *n* does not divide *N*, the remaining data is not used in this test.

8. The min-entropy is the negative logarithm of the parameter, p:

$$min-entropy = -\log_2(p)$$
.

9.3.5 The Markov Test

9.3.5.1 Test Overview

In a first-order Markov process, the output state depends only on the current state; in an n^{th} -order Markov process, the output state depends on the current state and the previous n-1 states. Therefore, a Markov model can be used as a template for testing sources with dependencies. The test provides a min-entropy estimate by measuring the dependencies between consecutive outputs from the noise source. The min-entropy estimate is based on the entropy present in any chain of outputs, instead of an estimate of min-entropy per output.

The key component in estimating the entropy of a Markov process is the ability to accurately estimate the matrix of transition probabilities of the Markov process. The main difficulty in making these estimates is the large data requirement necessary to resolve the dependencies. In particular, low probability transitions may not occur often in a 'small' dataset; the more data provided, the easier it becomes to make accurate estimates of transition probabilities. This test, however, avoids large data requirements by overestimating the low probability transitions; as a consequence, an underestimate of minentropy is obtained with less data.

This test has a data requirement that is dependent upon the sample size; the largest sample size accommodated by this test is six bits. Samples larger than six bits cannot be accommodated, since an unreasonable amount of data would be required to accurately estimate the matrix of transition probabilities, far more than is specified in Section 7.1¹¹. For 16-bit samples, for instance, a transition matrix of size 2¹⁶ x 2¹⁶, containing 2³² sample entries, would have to be approximated, and the data requirement for this would be impractical.

As an alternative for noise sources with samples greater than six bits, the method in Section 7.2 for mapping noise source outputs together (based on a ranking of the bits in the output) will be implemented. This will reduce the data requirement to a more feasible quantity.

_

¹¹ This statement assumes that the output space is defined such that it contains all 2^6 (or more) possible outputs; if, however, the output space is defined to have 2^6 or less elements, regardless of the sample size, the test can accurately estimate the transition probabilities with the amount of data specified in Section 9.2.

9.3.5.2 Implementation Summary

Samples are collected from the noise source, and specified as *k*-long chains. From this data, probabilities are determined for both the initial state and transitions between any two states. Any values for which these probabilities cannot be determined empirically are overestimated to guarantee that the eventual min-entropy estimate is a lower bound. These probabilities are used to determine the highest probability of any particular *k*-long chain of samples. The corresponding maximum probability is used to determine the min-entropy present in all such chains generated by the noise source. This min-entropy value is particular to *k*-long chains and cannot be extrapolated linearly; i.e., chains of length *wk* will not necessarily have *w* times as much min-entropy present as a *k*-long chain. However, it may not be possible to know what a typical output length will be at the time of validation. Therefore, although not mathematically correct, in practice, calculating an entropy estimate per sample (extrapolated from that of the *k*-long chain) provides estimates that are close.

9.3.5.3 Markov Test Details

Given a dataset $\{s_1, s_2, ..., s_N\}$, of noise or entropy source observations.

- 1. Re-define the confidence level to be $\alpha = min(\alpha^{n^2}, \alpha^k)$, where n^2 is the number of terms in the transition matrix, and k = 128 is the assumed length of the Markov chain.
- 2. Estimate the initial state probability distribution, *P*, with:

$$P_i = min\left\{1, \frac{o_i}{N} + \varepsilon\right\}$$

where θ_i denotes the number of times that state i has occurred in the sample, and ε is defined by:

$$\varepsilon = \sqrt{\frac{\log\left(\frac{1}{1-\alpha}\right)}{2N}}.$$

3. Estimate the probabilities in the transition matrix S, overestimating where

$$S_{i,j} = egin{cases} 1 & if & o_i = 0 \ min\left\{1, rac{o_{i,j}}{o_i} + arepsilon_i
ight\} & otherwise, \end{cases}$$

where $o_{i,j}$ is the number of transitions from state i to state j observed in the sample, and ε_i is defined to be

$$\varepsilon_i = \sqrt{\frac{\log\left(\frac{1}{1-\alpha}\right)}{2o_i}}.$$

4. Using the transition matrix S, find the probability of the most likely sequence of states, pmax.

$$pmax = \max_{i_1...i_l...i_k} \left\{ P_{i_l} \prod_{j=1}^k S_{i_j,i_{j+1}} \right\}$$

where the product runs over all possible sequences of states and where an individual state is denoted by i_l .

5. The min-entropy is the negative logarithm of the probability of the most likely sequence of states, *pmax*:

$$min-entropy = -\log_2(pmax)$$
.

9.3.6 The Compression Test

9.3.6.1 Test Overview

The compression test computes the entropy rate of a dataset, based on how much the dataset can be compressed. Based on the Maurer Universal Statistic [Maurer], the test generates a dictionary of values, and then computes the average number of samples required to write an output based on the dictionary. One advantage of using the Maurer statistic is that there is no assumption of independence. When output with dependencies is tested with this statistic, the compression rate is affected (and therefore the entropy), but an entropy estimate is still obtained. A calculation of the Maurer statistic requires only one pass through the dataset to provide an entropy estimate. This makes it a more efficient test than other compression algorithms. The Maurer statistic is the mean of the compression values, computed over the data.

9.3.6.2 Implementation Summary

Given a dataset from the noise source, first partition the samples into two disjoint groups. The first group serves as the dictionary for the compression algorithm; the second group is the test group. Calculate compression values over the test group and determine the mean, which is the Maurer statistic. Using the same method as the collision test, determine the probability distribution that has the minimum possible entropy for the calculated Maurer statistic. For this distribution, the entropy per sample is calculated and produced as the lower bound on the entropy that is present.

9.3.6.3 Compression Test Details

Given a dataset, $\{s_1, s_2, ..., s_N\}$ of noise or entropy source observations.

- 1. Partition the dataset into two groups. These two groups will form the dictionary and the test data.
 - a. Create the dictionary from the first d observations, $\{s_1, s_2, ..., s_d\}$ where d = 1000.

- b. The remaining v = N d 1 observations, $\{s_{d+1}, ..., s_N\}$, will be the test data.
- 2. Initialize the dictionary.
 - a. Beginning with s_1 , step through the dictionary sequence.
 - b. Record each unique observation and the index of observation.
 - c. When any observed value is repeated, update the index of observation with the most recent index value (the larger index value).
- 3. Run the test data against the dictionary created in Step 2.
 - a. Beginning with s_{d+1} , step through the test data.
 - b. Determine if the value of the observation is contained in the dictionary.
 - i. If the value is in the dictionary, calculate and record the difference between the current observation index and the recorded index in the dictionary as A_i , where i is the current index. Update the dictionary with the index of the most recent observation.
 - ii. If the value is not in the dictionary, add that value to the dictionary, and record the index of this first observation.
- 4. Repeat Step 3 until the end of the test data has been reached.
- 5. Calculate the sample mean, μ , and the sample standard deviation, σ , of the following values:

$$\left(\log_2(A_i)\right)_{i=d+1}^N$$

where the A_i are the calculated differences from Step 3b.

$$\mu = \frac{\sum_{i=d+1}^{N} log_2 A_i}{v}$$

$$\sigma = \sqrt{\frac{\sum_{i=d+1}^{N} (log_2 A_i)^2}{v} - \mu^2}$$

6. Compute the lower-bound of the confidence interval for the mean based on a normal distribution with confidence level α :

$$\bar{\mu} = \mu - \frac{1.96\sigma}{\sqrt{v}}.$$

7. Define a one-parameter family of probability distributions parameterized by p, P_p :

$$P_p(i) = \begin{cases} p & if & i = 0\\ \frac{1-p}{n-1} & otherwise \end{cases}$$

where n is the number of states in the output space.

8. Using a binary search, solve for the parameter p, such that E_{P_p} the expected value of the statistic applied to P_p , equals the mean $\overline{\mu}$.

$$E_{P_n}(S) = G(p) + (n-1)G(q)$$

where

$$G(p_i) = \frac{1}{v} \sum_{t=d+1}^{N} \sum_{s=1}^{t} \varphi(s) P[A_t = s \cap X_t = i],$$

$$P[A_t = s \cap X_t = i] = \begin{cases} p_i^2 (1 - p_i)^{s - 1} & if \quad s < t \\ p_i (1 - p_i)^{t - 1} & if \quad s = t \end{cases}$$

$$\varphi(x) = log_2(x),$$

and

$$q = \frac{1-p}{n-1}.$$

9. The min-entropy is the negative logarithm of the parameter, p:

$$min-entropy = -\log_2(p)$$
.

9.3.7 The Frequency Test

9.3.7.1 Test Overview

The frequency statistic computes entropy based on the occurrence of the most-likely sample value. The entropy is computed by modeling the probability distribution of the samples from a noise source. Like the Markov test, this calculation performs better with

more data – the more data provided, the more accurate the frequency calculations, since low probability values may not appear often, or at all, in 'small' datasets. This test, however, ignores/overestimates unlikely sample values and, therefore, does not require large amounts of data. In fact, this test will provide a conservative estimate of entropy based on whatever data is collected. As a result, an underestimate of min-entropy is obtained with less data.

9.3.7.2 Implementation Summary

Given a dataset from the noise source, step through the dataset, keeping track of the number of times that each sample value is observed. Record the occurrence of each value and continue the process until the end of the dataset. Once the end of the dataset is reached, determine the most likely sample value, based on the frequency counts gathered. The min-entropy frequency statistic is the negative logarithm of the probability of the most likely sample value.

9.3.7.3 Frequency Test Details

Given a dataset, $\{s_1, s_2, ..., s_N\}$, and the confidence level α :

- 1. Beginning with s_I , step through the dataset, keeping track of the number of times a value is observed, $count_i$, for all i=1...n, where n is the number of possible output values.
- 2. Calculate ε from the specified confidence level, α , and the number of observations in the dataset.

$$\varepsilon = \sqrt{\frac{\log\left(\frac{1}{1-\alpha}\right)}{2N}}$$

3. Determine the probability of the most likely observation value, *pmax* (the value with the largest frequency of occurrence):

$$pmax = \max_{i=1..n} \left(\frac{count_i}{N}\right).$$

4. The min-entropy is the negative logarithm of the sum of ε and the frequency of the probability of the occurrence of the most likely state, *pmax*:

min-entropy =
$$-\log_2(pmax + \varepsilon)$$
.

9.4 Sanity Checks Against Entropy Estimates

This section identifies tests that provide an opportunity to discover major failures that may have undermined the entropy estimates generated in the more extensive test suites.

9.4.1 Compression Sanity Check

The compression test is intended to determine whether the entropy estimates for the noise source and conditioning component are so incorrect that a general-purpose compression algorithm is able to encode the sequence of samples in fewer bits per sample than is required by the entropy estimate computed during validation testing. The Burrows-Wheeler compression algorithm as implemented in the BZ2 software package will be used [BZ2].

If the min-entropy of a dataset is estimated to be H bits, then no compression algorithm should be capable, in general, of encoding that dataset in fewer than H bits.

By nature, general-purpose compression algorithms like Burrows-Wheeler will perform poorly, compared to what is attainable in encoding specialized data, especially independent values. Thus, a single failed test is an indication that the entropy estimate is deeply flawed.

Let S be a collected dataset defined in Section 7.1. Divide S into ten equal-length, non-overlapping data subsets $S_1, ..., S_{10}$. Let S_i be one of the ten data subsets, and let H be the entropy estimate for the data source, as calculated in Section 9.2 or Section 9.3 (depending upon the test track taken). The test is performed as follows on the ten data subsets of samples:

For i = 1 to 10:

- 1. EncodeS = the encoding of S_i as a string¹².
- 2. $C = \mathbf{compress}(EncodeS)$.
- 3. Len = the length of C in bits.
- 4. If Len $< H \left\lfloor \frac{N}{10} \right\rfloor$, the dataset fails the test.

If the test fails for even one of the ten data subsets, it is likely that the entropy estimate is inaccurate.

9.4.2 Collision Sanity Check

9.4.2.1 General Description

The min-entropy can be used to provide a bound on the probability of seeing a collision in many trials because the collision entropy (Renyi entropy of second order) is bounded by

¹² *EncodeS* consists of representing the sequence of samples as a character string containing their decimal values separated by commas. Thus, a sequence (3, 1, 4, 1, 5, 9) becomes "3, 1, 4, 1, 5, 9".

the min-entropy. There are many ways in which a noise source might suffer rare, intermittent failures that would lead to an occasional repeated sequence that should, given the entropy estimates, have an extremely low probability of occurring. This kind of problem will be detected by the collision sanity check, while it might not be detected by any other test.

The collision sanity check offers a chance to notice a particular kind of gross overestimate of entropy, in which sequences of samples with some useful amount of entropy (for example, 30 bits) repeat more often than expected.

This test may be applied to any noise source, using a dataset as specified in Section 7.1.

9.4.2.2 Testing Noise Sources With an Entropy Estimate per Sample

For datasets whose entropy estimate is in terms of *H* bits of entropy per sample, the testing is performed as follows:

1. Using the complete dataset collected as specified in Section 7.1, determine the size of the 'tuples' to be examined for collisions. This test will examine each successive *b*-tuple of samples from the dataset. To determine *b*, numerically solve using the following equation for *b*:

$$b = Round((2 \log_2(N/b) - 1)/H).$$

The formula is derived as follows: Given N samples in the dataset, the dataset can be divided into (N/b) non-overlapping b-tuples. The number of times each b-tuple occurs in the dataset must be counted; since there are $\left\lfloor \frac{N}{b} \right\rfloor$ b-tuples, there are about $\frac{\left(\left\lfloor \frac{N}{b} \right\rfloor \right)^2}{2}$ potential collisions of b-tuples. Since each b-tuple has Hb bits of entropy, the expected number of b-tuple collisions is:

$$2^{-Hb} \frac{\left(\left|\frac{N}{b}\right|\right)^2}{2}$$
.

The test requires choosing the value of b so that the expected number of collisions is as close to one as possible. Some approximate b values given N and H are included in Figure 4 for reference¹³.

	N		
Н	1,000,000	10,000,000	100,000,000
0.01	1735	2315	2913

 $^{^{13}}$ The first column contains the approximate b values for the data requirement specified in Section 9.2. The other columns indicate how additional data may affect the implementation of this test.

0.1	232	291	353
0.5	55	67	79
1.0	29	35	41
2.0	15	19	22
5.0	7	8	9
10.0	4	4	5
20.0	2	2	2

Figure 3: Approximate b values given N and H

- 2. Divide the dataset into successive b-tuples and count the number of occurrences of each value of a b-tuple. A dataset of N samples yields $\left\lfloor \frac{N}{b} \right\rfloor$ non-overlapping successive b-tuples. For example, the combined dataset (1,2,3,4,2,3,1,2,4) would yield four 2-tuples, ((1,2), (3,4), (2,3), (1,2)). Each tuple is treated as an individual value, and the total number of times each value appears in the dataset is counted. In the above example, there are two occurrences of the (1,2) 2-tuple, and one occurrence of each of the others.
- 3. Determine whether the noise source and entropy estimate should be rejected.

<u>Rule 1</u>: If three or more *b*-tuples have the same value, the source is rejected. Given the parameters chosen by the above formula, this has a very low probability, assuming that the entropy estimate is correct.

Rule 2: A *p*-value on the number of collisions is determined, approximating the probability of *x* collisions as a Poisson distribution with $\lambda = 2^{-Hb} \frac{\left(\left| \frac{N}{b} \right| \right)^2}{2}$, and choosing as the cutoff value the smallest number of collisions such that the probability of that many or more collisions is less than 1/10000.

If the total number of colliding pairs of *b*-tuples is greater than or equal to the cutoff value, then the source is rejected.

10.0Health Test Validation: Testing for Equivalent Functionality

Entropy sources that do not implement the Repetition Count Test and the Adaptive Proportion Test **shall** include alternative continuous tests that detect the same failure conditions. The developer **shall** provide the tester with an implementation of their alternative test(s) that can be run incrementally on a dataset of arbitrary length, and a dataset of the required length drawn from the underlying noise source, referred to as the original dataset. Using the min-entropy per sample, H, that is obtained from the tests specified in Section 9.0, a new dataset is generated from the original dataset that simulates a failure that would be detected by the Repetition Count or Adaptive Proportion Test, as

appropriate. The tester will determine the equivalence of the alternative test(s) as described in Sections 10.1 and 10.2.

10.1 Demonstrating Equivalent Functionality to the Repetition Count Test

The original dataset, in this case, is modified to contain a repeated sequence of sample values that is slightly longer than would be allowed to pass by the Repetition Count Test. If the alternative test detects this repetition, it is assumed to have equivalent functionality to the Repetition Count Test.

In order to demonstrate equivalent functionality to the Repetition Count Test, the following steps are performed:

- 1. Based on *H*, the cutoff value, *C*, at which the Repetition Count Test should fail, is determined as described in Section 6.5.1.2.1.
- 2. A modified dataset D' is created, in which a repetition of C samples of the same value will be inserted at some point.
 - a) Let the length of the original dataset, D, be N (i.e., N is the number of sample values in dataset D). The minimum value of N is one million samples; the dataset used for validation testing may be used.
 - b) A random position k is chosen within the dataset, where $0 \le k < N (2C + 2)$; the sample value at position k (i.e., D_k) is selected as the sample to be repeated.
 - c) The modified dataset, D', is formed by replacing C-1 sample values in D' with D_k . That is,

For
$$i = k+1$$
, $k+C$: $D'_i = D_k$.

Note that this simply places a sequence of C repeated values into the dataset.

- 3. The alternative test is run on the modified dataset, D'.
 - a) If the alternative test detects the simulated failure, then equivalent functionality to the Repetition Count Test has been demonstrated, and the developer's alternative test can be used in place of the Repetition Count Test.
 - b) If the alternative test fails to detect this simulated failure, then equivalent functionality has not been demonstrated, and the alternative test **shall not** be used in place of the Repetition Count Test.

10.2 Demonstrating Equivalent Functionality to the Adaptive Proportion Test

This test generates a simulated dataset that is very similar to the original validation dataset, but which has one new feature: a randomly-selected sample value in the dataset is made to occur more often than it should, given the per-sample min-entropy estimate H for the noise source. If the alternative continuous test detects the simulated failure in this dataset, equivalent functionality to the required Adaptive Proportion Test has been demonstrated.

In order to demonstrate equivalent functionality to the Adaptive Proportion Test, the following steps are performed:

- 1. Determine the parameters needed to generate a dataset that simulates a large loss of entropy, with enough samples that the Adaptive Proportion Test with N = 64 is overwhelmingly-likely to detect the failure.
 - a) Let C = the cutoff value for N = 64, computed for the assessed min-entropy per sample, H, of this noise source.
 - b) Let $P_{failure} = (C+1)/N$ be the maximum probability for any sample value in the simulated failure dataset.
 - c) Let $L = 1280(2^H)$ be the minimum-acceptable length of the simulated dataset, to guarantee that an alternative test that provides equivalent functionality to the Adaptive Proportion Test has a very low probability of failing this test of equivalence.
- 2. Obtain a dataset D from the noise source, that contains L successive sample values, to generate a modified dataset D' that contains a particular value with higher probability than should be occurring in the dataset. Note that if L is less than or equal to the length of the original dataset provided for validation, the original dataset may simply be reused for this test.
 - a) Let A = a randomly selected sample from the dataset D.
 - b) Let $P_{original} =$ (the number of times that A appears in D) / L
 - c) Let $P_{delta} = (P_{failure}-P_{original})/(1-P_{original}) =$ the fraction of sample values in D to change.
 - d) For j = 0 to *L*-1:
 - i. Generate a random number *R* between 0 and 1 using any reasonably good RNG.
 - ii. If $R < P_{delta}$: $D'_i = A$.
 - iii. Else: $D'_i = D_i$.
- 3. Run the alternative test on this dataset.

If the alternative test does not detect the simulated failure, then equivalent functionality to the adaptive proportion test with N = 64 has not been provided, and the alternative test **shall not** be used in place of the Adaptive Proportion Test.

Annex A: References (Informative)

[FIPS 140]	Federal Information Processing Standard 140-2, Security Requirements for Cryptographic Modules, May 25, 2001.
[FIPS 180]	Federal Information Processing Standard 180-4, <i>Secure Hash Standard (SHS)</i> , March 2012.
[FIPS 197]	Federal Information Processing Standard 197, <i>Advanced Encryption Standard (AES)</i> , November 2001.
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