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**Testing Protocol
Standards for the Testing of
Anti-Malware Solutions**

**Sponsored by:**

The Anti-Malware Testing Standards Organization, Inc.
AMTSO Member Approval Date (XX-XX-XXXX)

**Abstract:**

This standard provides testing protocol and behavior expectations for testers and vendors relating to the testing of anti-malware solutions. They further standardize how information should be communicated to vendors with products or solutions that may be included in a public test. Separate sections on referenced publications, definitions, standards elements and arrangements are included.

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# Foreword

This standard was developed to provide guidance to anti-malware testers and vendors, and any others involved in the testing or rating of anti-malware products and solutions. This standard includes testing protocol that can be used by any entity or individual whose professional or private activities are relevant to the subject addressed. Compliance with this standard conforms to the principles and practices of AMTSO’s Fundamental Principles of Testing.

AMTSO is a non-profit organization established to help improve the business conditions related to the development, use, testing and rating of anti-malware solutions. Anti-malware testing is the critical link between the vendor and end user and proper testing can establish that anti-malware solutions work as vendors claim. However, improper testing can create misleading results and leave corporations and consumers with inadequate protection that risks both their privacy and security. In addition, the lack of proper testing protocols can create unnecessary expense for vendors, which ultimately can impact the amount of resources devoted to research and development, and shift focus from critical threat detection toward compliance with opaque or unfair testing procedures.

##### A key part of AMTSO’s mission has been to establish protocols relating to testing behavior within the industry. In 2008, AMTSO adopted principles for testing that have been widely adopted as best practices for anti-malware testers. However, these general principles did not provide the structure necessary to improve testing conditions on a global scale. To solve this problem, AMTSO has driven a cross-industry effort to develop globally applicable testing standards and a related certification program. This standard is based on a premise that although testers and vendors must retain their independence, proper anti-malware testing cannot occur if the relationship is adversarial. We believe that the AMTSO standards and certification program has the potential to create a higher level of customer trust through more consistent testing and improvement in industry behavior, and by helping to ensure that anti-malware solution testing is open, transparent, fair, accurate and reliable.

Suggestions for improvement of this standard are welcome. They should be sent to the Chairperson of the AMTSO Standards Committee via email to: standards@amtso.org.

AMTSO Standards Committee

The following members of AMTSO’s Standards Committee participated in the development, review and approval of this standard. The affiliated organizations are listed to demonstrate the openness and balance of the committee. Approval of this standard by the individuals listed does not imply endorsement of the affiliated organization.

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The following members of the AMTSO Board of Directors have approved this standard. Approval of this standard by the individuals listed does not imply endorsement of the affiliated organization.

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The following organizations, which are members of AMTSO, have approved this standard.

LIST OF MEMBERS THAT APPROVE HERE – with their consent to publicly list their names

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Testing Protocol Standards for the
Testing of Anti-Malware Solutions

Important Notice: AMTSO standards establish process guidelines for fairness in the testing process. They are not intended to, nor do they, assure the accuracy of test results or ensure the security of any party, or legal compliance with any federal, state or local restriction or law. Implementers of AMTSO standards are responsible for determining and complying with all applicable rules and regulations.

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1. **Overview**
	1. **Scope**

This standard includes testing protocol requirements for testers, and testing compliance requirements for vendors, of anti-malware solution testing. Unless otherwise specifically noted, this standard apply only to tests with publicly-released results, and do not apply to tests that will not have publicly-released results.

* 1. **Purpose**

The purpose of this standard is to help improve the transparency and fairness of anti-malware tests that are made publicly available. Additional purposes include: providing testers with fair access to solutions to test; encouraging more voluntary participation by vendors; establishing methods for vendor notification; supporting disclosure of provenance and curation strategy, and vendor access to test samples; and establishing processes for conflict resolution.

This standard serves as the foundation for the AMTSO certification program, established by AMTSO to help ensure reliability of compliance assertions made in connection with validation of an anti-malware solutions test.

1. **Normative References, Definitions and Acronyms**
	1. **Normative References**
		1. The following documents, in whole or in part, are normatively referenced in this document and are important for its application. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.
			1. AMTSO - Best Practices for Dynamic Testing
			2. AMTSO - Best Practices for Testing In-the-Cloud Security Products
			3. AMTSO - Guidelines for Testing Protection Against Targeted Attacks
			4. AMTSO - Guidelines on Facilitating Testability
			5. AMTSO - Guidelines to False Positive Testing [is this something we should address in this standard – e.g., testing protocols for FP testing]
			6. AMTSO - Issues Involved in the “Creation” of Samples for Testing
			7. AMTSO - Performance Testing Guidelines [this is another potential opportunity to provide some specialized testing protocol for performance testing]
			8. AMTSO - Sample Selection for Testing
			9. AMTSO - Suggested Methods for the Validation of Samples
			10. The AMTSO Fundamental Principles of Testing
			11. AMTSO - Whole-Product Testing Guidelines [as above – guideline includes some specific advice for setting up for a whole-product test]
	2. **Definitions**
		1. **AMTSO Member**. Individual or entity that has been accepted as a member of AMTSO and has met the current requirements for membership, including payment of annual membership fees.
		2. **Anti-Malware**. Products and services designed specifically to eliminate malware. Anti-malware solutions may offer standalone protection, or may be incorporated into suites of products and services.
		3. **Board.** The Board of Directors of AMTSO.
		4. **Commencement Date of a Test.** The Commencement Date of a Test shall be the date that XY and Z occur
		5. **Draft Standard.** A draft document that will be subjected to final review and approval by AMTSO members and the Board.
		6. **Editorial Revision.** A change made to the test of a standard to improve the clarity or preciseness of the language or to correct a typographical or grammatical error.
		7. **Malware**. Malware includes, without limitation software or other electronic data designed to, or otherwise capable of, infiltrating and/or damaging a computer system (such as computer viruses, worms, trojan horses, spyware and similar computer contaminants).
		8. **Participant**. An individual or vendor that has a product or service included in an anti-malware test.
		9. **Private Test**. An anti-malware test that does not include any results that will be publicly released or referenced.
		10. **Public Test**. An anti-malware test that includes any results that will be publicly released or referenced.
		11. **Standard.** A term generically used in this document to reference testing protocol requirements, specifications, recommended practices and guidelines, published in accordance with established procedures.
		12. **Tester**. An individual or entity that conducts tests on anti-malware products or services to establish functionality, effectiveness, comparative results, compliance, or other determinations.
		13. **Vendor**. An individual or entity that produces any product or service related to the detection or removal of anti-malware, and intended for third party acquisition.
		14. **Working Draft**. A document under development prior to initial balloting within AMTSO.
	3. **Acronyms**
		1. **AMTSO:** The Anti-Malware Testing Standards Organization, Inc.
		2. **FTC**: Federal Trade Commission.
		3. **SWG:** The Standards Working Group within AMTSO.
2. **AMTSO Contact List**
	1. Vendors that have any product or solution that may be included in any public test, and Testers that intend to conduct any public test, may provide up-to-date contact information to AMTSO for inclusion on the AMTSO Contact List.
		1. The AMTSO Contact List shall be hosted on the amtso.org website and shall be maintained by AMTSO.
		2. A Vendor or Tester does not need to be an AMTSO member to include their contact information on the AMTSO Contact List.
		3. AMTSO shall update contact information provided by any Vendor or Tester for inclusion in the AMTSO Contact List within ten (10) business days of receipt.
		4. AMTSO shall not be responsible for the accuracy of contact information provided by any Vendor or Tester.
	2. Vendors that do not provide up-to-date contact information to AMTSO may not receive direct notice from a Tester with regard to any Public Test Plan.
		1. Testers are entitled to rely on information provided in the AMTSO Contact List, and shall not be responsible to take further efforts to provide proper notification if current contact information has not been provided.
	3. Testers that are members of AMTSO shall have access to the AMTSO Contact List.
3. **Notification of Test Plan**
	1. Testers shall provide notification of a Test Plan to all potential participants by either:
		1. Sending notification directly to the potential participant through use of contact information included on the AMTSO Contact List (described above) or otherwise provided by a potential participant; or
		2. Through public notification of the Test Plan (described below).
	2. Testers may make a public request for test participants on the AMTSO website or on another agreed upon public forum, and provide the Test Plan directly to such participants upon their reply.
	3. A Tester that provides public notification using the methods listed above shall meet its obligation for public notification of a Public Test, regardless of whether a potential participant is in actual receipt of such notification prior to a test.
4. **Public Test Notification Requirements**
	1. Testers shall post public notification of a Test Plan on the AMTSO website or on another agreed upon public forum where Vendors may access this notification.
	2. Testers shall publicly post the Test Plan for all potential participants no more than one (1) year, and no less than 10 days, before the Commencement Date of a test.
	3. The Test Plan shall either be for a single plan for a single test, or for a plan that covers multiple potential tests with different combinations of vendors that could be commenced at any time within a one (1) year period from the date of posting.
	4. *AMTSO shall provide notification to all contacts on the AMTSO Contact List upon the posting of any public Test Plan [by an AMTSO member.]*
	5. All potential participants are encouraged to provide their product or solution as requested by any legitimate Tester, whether it be freely provided, provided for cost or otherwise.
5. **Test Plan Requirements**
	1. The Test Plan shall include the following information:
		1. A stated intent by the Tester to follow these AMTSO standards.
		2. The purpose of the test.
			1. *Informative Reference.* AMTSO Guidelines for Testing Protection Against Targeted Attacks. For the purpose of the test to be clear and valid, it is necessary to define both the types(s) of solutions being tested, and the type(s) of threats those solutions will be tested against.
		3. The specific date of the test, or a range of dates of the test, which shall commence no later than one (1) year from the date of the Test Plan.
		4. A reasonably approximated schedule for the test.
		5. A clear definition of the test environment which shall include:
			1. A statement of representation approximating the test environment;
			2. A statement of methodology, for example, [standard vs. experimentation]
				1. *Normative Reference*: AMTSO Best Practices for Dynamic Testing: A testing environment includes the operating system of a machine, whether it is a real or virtual machine, the network connectivity, how the malware is launched, etc.
		6. A statement of intention of the products and/or solutions to include in the test, including versions, configuration, and whether the whole or a part of the product/solutions will be tested.
			1. *Informative Reference*. When running solutions over long periods of time, version information may not be available or may change as various components are updated. Testers should provide a policy of how this will be handled as part of the test methodology in the test plan. AMTSO Best Practices for Testing in-the-Cloud Security Products.
		7. An overview of the test’s scoring and certification plan.
		8. Instructions on how the test results can be disputed.
	2. The Test Plan shall also include an invitation to vendors of solutions that may be included in the test to become Voluntary Participants through notification to the Testers and compliance with the disclosure requirements in this standard. Upon receipt of such notification, the Tester will include additional information in the Test Plan, including:
		* 1. A “reasonable” amount of information on sample provenance and curation strategy.
				1. *Informative Reference.* A “reasonable” amount shall be an amount that will provide the Voluntary Participant with enough information to understand where the samples originated and how they will be curated, but not so much information as to be administratively burdensome for the Tester.
			2. A clear description on how test results will be curated and minimum proof required, including whether the samples are protected by a non-disclosure agreement and how that would be addressed in a dispute.
				1. *Informative Reference.* AMTSO Sample Selection for Testing. Curation of sample sets is the complete process of collection, validation, and classification of malware samples. Collection is the process of gathering/selecting the files, URLs or other objects to be used as test cases. Validation is the process of making sure that the file or object to be used functions properly in the defined testing environment. Classification (also called verification) is the process of properly categorizing the files or objects into their correct category set.
	3. A Tester may remain in compliance with this standard even if potential participants do not opt to become Voluntary Participants, as long as they were provided with such option.
	4. The Test Plan may provide potential vendors with the option to “opt out” of participation in a test. Testers may provide Vendors the option to “opt out” of a public test; however, a Vendor that does “opt out” does not have any additional rights to avoid being included in such test.
	5. The Test Plan may include instructions for potential participants to provide the following “Specific Data” regarding the product or solution to be included in the test:
		1. Disclosure for each product or solution included in the test which data is transmitted to the cloud.
		2. The Command Line Interface (CLI) of the product or solution with documented parameters.
		3. An Application Program Interface (API) for the product or solution to access the Vendor’s cloud.
			1. *Informative Reference.* **Cloud**. AMTSO Best Practices for Testing in-the-Cloud Security Products. The term’s “cloud” and “in the cloud” refer, respectively, to the internet (or other resources external to a protected system) and to resources and technologies run or served from there – online detection databases reputation system, black- and whitelists, managed services and so on.
	6. [*The Test Plan may include a requirement that any disputes from a participant must be accompanied by an element of proof, or evidence that the dispute is legitimate, rather than just the participant’s statement of disagreement*. ]
6. **Voluntary Participants.** In response to the Test Plan, all Vendors may choose to become a Voluntary Participant, by providing notification to the Tester in the manner designated in the Test Plan and complying with the AMTSO Voluntary Participant Requirements, set forth below.
	1. **Voluntary Participant Requirements**. A Voluntary Participant shall provide the following disclosures to the Tester:
		1. The Specific Data, defined in Section [\_\_] above.
		2. Any existing product feature either specifically designed to preclude accurate testing or that the Vendor knows has that effect.
		3. Any known or anticipated “variances” between the product or solution acquired or submitted to the Tester for inclusion in the test, and the final product that will be provided to the end user.
			1. “Variances” shall include all non-routine changes or configurations to a product or solution, that causes a material difference between the product or solution that has been included in a Test, and that which is provided to the end user.
			2. “Variances” do not include any routine product or solution updates or upgrades.
				1. *Informative Reference.* This standard is intended to address the “Golden Sample” issue, in which products and solutions may be provided for testing that are not representative of the product or solution that will be provided in actual production and delivery to the end user.
		4. Any material conflict of interests or other information that could materially impact the reliability of the test.
			1. *Informative Reference.* A conflict of interest is a situation in which financial or other personal considerations have the potential to compromise or bias professional judgment and objectivity. An “apparent conflict of interest” is one in which a reasonable person would think that the professional’s judgement is likely to be compromised. A “potential conflict of interest” involves a situation that may develop into an actual conflict of interest. Please note that the existence of a conflict of interest does not mean that there is any misconduct. Misconduct in testing is limited to fabrication, falsification and plagiarism. A conflict of interest only implies the potential for bias, not a likelihood.[[1]](#footnote-1)
		5. Any unlicensed third-party intellectual property in the product or solution being tested.
			1. A Tester may rely on the assertion or omission of a Voluntary Participant regarding the use of any third-party intellectual property included in the product or solution to be tested.
	2. In completing the disclosure requirements, a Voluntary Participant may provide an “exceptions” list, identifying specific disclosed items that are precluded from public disclosure.
		1. *Informative Reference*. The “exceptions” list is meant to provide a method for a Voluntary Participant to provide information to the Tester that is protected by confidentiality. In general, any information the Tester discovers regarding the tested product or solution may be made part of the Tester’s public test results. The intention with this provision is to encourage open and honest disclosure by the Voluntary Participant to improve the potential for accurate test results. *Note* – we may need to have a cap on the number of these that are provided.
	3. Voluntary Participants shall provide “timely” and “relevant” responses to Tester inquiries.
		1. A “timely” response shall be provided within five (5) business days of the receipt of the request from the Tester.
		2. A “relevant” response shall be one that directly addresses the subject of the request from the Tester.
	4. Voluntary Participants shall provide the Tester with a complete and executed Voluntary Participant Attestation, in substantially the form provided on the AMTSO website, which shall state that the participant has complied with all Voluntary Participant Requirements, including any exceptions.
	5. Vendors who do not notify the Tester of their intention to be a Voluntary Participant, or who do not follow the Voluntary Participant Requirements, are not considered to be Voluntary Participants, and have no specific communication or review rights with regard to a test procedure or test results, and shall be provided only limited access to post comments on the test to the AMTSO website.
	6. A Voluntary Participant may cease complying with the Voluntary Participant Requirements, and thus no longer be a Voluntary Participant, at any time prior to completion of the testing process.
7. **Behavior During a Test.**
	1. **Participant Behavior During a Test**.
		1. All participants in a test are prohibited from revising their products or solutions while a test is knowingly being conducted with the “specific intent” of impacting the test results.
			1. “Specific intent” refers to an intentional plan or action by the participant to impact the performance or results of testing such participant’s product or solution, or the performance or results of any other participant’s product or solution.
			2. If any general improvements are made to any products or solutions while a test is knowingly being conducted, such improvements should be disclosed to the Tester.
			3. *Informative Reference*. This standard does not prohibit any general improvements meant for the end user, such as standard cloud updates. Rather, it is meant to address behavior by a vendor to adjust a product and specifically skew test results.
		2. Vendors are encouraged to keep testers informed of any changes to how products operate which may affect the running of ongoing tests. Significant changes would include areas such as (i) logging format, (ii) the style and position of prompts or pop-ups, (iii) default configurations; and (iv) system requirements.
			1. *Informative Reference.* AMTSO Guidelines to Facilitating Testability, AMTSO strongly encourages open and timely communications between testers and vendors, particularly on issues which may affect how tests can be run.
	2. **Tester Behavior During a Test.**
		1. Testers shall test all participants, products and solutions included in any test fairly, regardless of whether the test was commissioned and who commissioned the test.
		2. Testers shall disclose any anticipated inequity to test participants, including any known material conflicts of interest or other information that could potentially make the testing methodology or results unequal as between participants.
		3. After a test run, if available, testers shall retain logs of material testing procedures for verifications and disputes for a pre-determined period of time.
			1. *Informative Reference*. AMTSO Best Practices for Dynamic Testing. In dynamic tests, the behavior of malware is crucial to how the products perform, therefore, it is important for the tester to have adequate logging and auditing of how the test proceeds. At the very least, this should cover: (i) the actions the malware takes on the infected/compromised machine; (ii) modifications made to files, registry and system areas; and (iii) traces of network activity.
			2. *Informative Reference*. Please refer to AMTSO Guidelines on Facilitating Testability, Section 2, Logging, for a full description of details recommended to be included in logs, including: (i) an event occurred; (ii) time of event; (iii) a unique event ID or reference; (iv) event category or description; (v) source or originator of the event; (vi) threat id/classification; (vii) actions taken; (viii) time taken between event and response/action. Additional examples of product-related content for logging: (i) initialization time; (ii) update time/version; (iii) version information.
		4. If a Tester used a vendor-curated sample set, the Tester must provide AMTSO with dispute statistics to include on the AMTSO test page.
		5. If significant anomalous issues are detected during a test run, Testers shall attempt to contact the participant to debug the situation, rather than simply stating that the product or solution is defective.
			1. *Informative Reference.* This standard is intended to prevent a Tester from ignoring an obviously flawed configuration or test and encouraging the Tester to instead work with the participant to ensure the product or solution is fairly and accurately tested.
		6. After completion of a test run, Tester shall notify all participants in the test, and may provide initial results to each participant. [Question to the group – does this count as a post-testing phase – does this launch a disputes process that we should address?]
			1. *Informative Reference.* AMTSO Guidelines on Facilitating Testability. Testers are encouraged to provide vendors taking part in their tests with adequate information to diagnose and, ideally, to rectify any problems reported in tests – for example, failure to detect or block attacks.
8. **Behavior After Completion of a Test**.
	1. **Participant Behavior After a Test**
		1. Voluntary Participants shall have the right to audit their solution configuration.
			1. The audit of the solution configuration may be through reviewing relevant portions of the Tester’s log.
			2. Voluntary Participants that request any logs of material testing procedures for verifications and disputes must provide human-readable (unencrypted) logs and instruct the tester how to enable logging.
		2. Test Commentary
			1. Voluntary Participants shall have the right to attach commentary to the test regarding the test and their specific solution results in a meaningful way.
			2. Participants other than Voluntary Participants may attach commentary to the test solely with regard to the specific reason that such vendor is not participating in the test as a Voluntary Participant.
				1. Commentary shall be included with the test via hyperlink or otherwise in reference to the AMTSO website, which shall include the name of the test, the test results (which may be behind a paywall or otherwise restricted) and the participant commentary.
				2. AMTSO shall monitor and moderate all commentary provided in this regard.
		3. All participants shall comply with AMTSO deadlines on commentary submission.
			1. *Normative Reference*. AMTSO deadlines are listed at [need to have a link and the deadlines drafted]
		4. All participants shall adhere to both AMTSO and other contractual guidelines on the publication of test results.
			1. *Normative Reference*. AMTSO contractual guidelines are listed at [need to have a link and the guidelines drafted]
	2. **Tester Behavior After a Test**
		1. Testers shall present public test results in a way that is clear and understandable to prevent the results from being deceptive, unfair or misleading.
			1. *Informative Reference.* Any parties publicly using the Test results are directed to follow the basic principles of advertising law, which state: (1) advertising must be truthful and not misleading; (2) advertisers must have evidence to back up their claims, and (3) advertisements cannot be unfair[[2]](#footnote-2).
		2. The publicly released final test results shall include:
			1. A “usage statement” which covers AMTSO’s standards.
			2. Detailed information on the specific products and/or solutions included in the tests, including version details.
				1. *Informative Reference.* AMTSO Best Practices for Testing in-the-Cloud Security Products.
			3. Material conflicts of interest by participants and the tester, or other commissioning parties with regard to the particular test at issue.
			4. Any Voluntary Participant “disclosures” that have not been excepted as confidential.
			5. How the test was (or will be) funded.
			6. Other services that the tester may offer that could have been accessed by a vendor.
			7. The Test Plan (included or referenced).
			8. Data regarding the tests run, including date and time, in a standard format so the results are clear and can be easily understood.
			9. Guidance on how and if the test can be validated.
			10. Clear parameters on how Test Results can be used, e.g., sharing excerpts of results must be linked back to the source.
			11. Specific scores/certifications and any clarifying statements of statistical relevance.
			12. Testers shall provide a hyperlink to the AMTSO website for readers to obtain “Additional Information” about each Public Test.
				1. *Informative Reference.* This standard allows critical additional information from both the Tester and participating vendors to remain accessible, even if included separately from the results.
				2. To ensure effectiveness of this standard, Tester must ensure the hyperlink: (1) is obvious; (2) appropriately shows the importance, nature and relevance of the information it leads to; (3) is placed close to the relevant information that it is qualifying to ensure that it is noticeable, and significant scrolling is not necessary; (4) takes the end user directly to the disclosure on the click-through page.
				3. Testers may choose to assess the effectiveness of the hyperlink by monitoring click-through rates and other information about end user usage and make changes accordingly.
		3. Tester shall provide AMTSO with appropriate data to run the certification process that is not otherwise included in the publicly released final test results, including the Test Plan, test results, commentary received and dispute statistics.
		4. Tester shall provide AMTSO with a complete and executed Tester Attestation, in substantially the form provided on the AMTSO website, which shall state that the Tester has complied with all AMTSO standards required for certification.
		5. Tester shall notify AMTSO about the discovered material misuse of any test results, and should respond to the alleged abuser, as appropriate.
		6. Tester shall make timely amendment to any test results that are still within any “dispute period” as necessary, based on material new information or the resolution of disputes.
		7. Tester shall ensure that any party with rights to any test results shall adhere to the contractual requirements of such test, if applicable, and AMTSO guidelines regarding publication of the test results, as set forth above.
9. AMTSO Requirements. As an organization, AMTSO has agreed to undertake certain obligations to help drive this standard and the related conformity assessment program. Thus, AMTSO has agreed that it:
	1. Shall develop and maintain testing protocol standards, which shall include regular review and updating of standards, as appropriate and necessary.
	2. Shall host a repository for all vendor and tester contact information, voluntarily provided and updateable by each party.
	3. Shall host a site where testers can post public test plans, and link back to the tester’s site for each test.
	4. Shall provide notice to AMTSO members and others regarding the posting of any open test plan.
	5. Shall timely complete the certification process for submitted tests.
	6. Shall manage a certified test repository, with results to publicly available tests that may provide links behind a paywall or allow testers to submit a test summary statement in lieu of full results.
	7. Shall host public test pages for all tests that successfully pass AMTSO’s certification process. The page will include the test plan, participants and their status, the tester, vendor commentary, and dispute results, if the test used a sample set curated by the participating vendors.
	8. Shall provide support and resolution to testers and vendors with regard to questions regarding compliance with AMTSO standards.
	9. Shall respond in a timely manner to inquiries regarding any certified test or tester, including regarding allegations of improper behavior.[[3]](#footnote-3)
	10. Shall publicly defend a properly certified test when accusations of improper behavior are settled.
	11. Shall help facilitate arbitration between vendors and testers, as appropriate and as necessary.
	12. Shall help resolve issues regarding improper use of test results.
	13. Shall serve as an advocate for the rights of testers to have access to and test all anti-malware solutions.
10. AMTSO Conformity Assessment Process. Process for assessing conformity to standards – to follow once developed:
	1. How we are fed information
	2. Lab qualification
	3. External or internal committee review
	4. Issue arbitration procedures
11. [Tester Accreditation Program] – We could add a component that allows testers that meet certain requirements to become accredited testers – entitling them to use the AMTSO certificate. This could reduce a good deal of work for AMTSO, and serve a great benefit. As with any accreditation program, this would require ongoing obligations.

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This document was adopted by AMTSO on DATE

1. <http://ori.hhs.gov/education/products/columbia_wbt/rcr_conflicts/foundation/> [↑](#footnote-ref-1)
2. **See *FTC Policy Statement on Deception, appended to Cliffdale Associates, Inc.* 103 F.T.C. 110, 174 (“Deception Policy Statement”), which states, in part, an ad is deceptive if it contains a statement, or omits information, that is likely to mislead consumers acting reasonably under the circumstances and is “material” or important to a consumer’s decision to buy or use the product.**  [↑](#footnote-ref-2)
3. We removed the “right” for AMTSO to comment on uncertified test results. We want testers to submit tests for certification without concern of commentary about uncertified results. [↑](#footnote-ref-3)