

PCI Security Standards Council Bulletin: Revisions to the Implementation Dates and Scope for PCI PIN Security Requirement 32-9

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Based on industry feedback, the PCI SSC is revising the implementation dates and modifying the applicability [for PCI PIN Security Requirements v3.1](#) Requirement 32-9. These changes are effective immediately and will be reflected in the PCI PIN Security Requirements and Testing Procedures Version 3.1, due for release later this year.

Requirement 32-9 currently states:

The KIF must implement a physically secure room for key injection where any secret or private keys or their components/shares appear in memory outside the secure boundary of an SCD during the process of loading/injecting keys into an SCD.

The secure room for key injection must include the following:

- **Effective 1 January 2021**, the injection of clear-text secret or private keying material shall not be allowed for entities engaged in key injection on behalf of others. This applies to new deployments of **POI v3** and higher devices. Subsequent to that date, only encrypted key injection shall be allowed for **POI v3** and higher devices.
- **Effective 1 January 2023**, the same restriction applies to entities engaged in key injection of devices for which they are the processors.

*Note: This does not apply to key components entered into the keypad of a secure cryptographic device, such as a device approved against the PCI PTS POI Security Requirements. It does apply to all other methods of loading of clear-text keying material for **POI v3** and higher devices.*

The implementation dates have been deferred three years and the applicability changed from POI v3 and higher devices to POI v5 and higher devices as follows:

- **Effective 1 January 2024**, the injection of clear-text secret or private keying material shall not be allowed for entities engaged in key injection on behalf of others. This applies to new deployments of **POI v5** and higher devices. Subsequent to that date, only encrypted key injection shall be allowed for **POI v5** and higher devices.
- **Effective 1 January 2026**, the same restriction applies to entities engaged in key injection of devices for which they are the processors.

*Note: This does not apply to key components entered into the keypad of a secure cryptographic device, such as a device approved against the PCI PTS POI Security Requirements. It does apply to all other methods of loading of clear-text keying material for **POI v5** and higher devices.*

The individual Payment Card Brands manage compliance programs for PCI Security Standards. Organizations should contact them directly with any questions.