Crowd Strike Channel File 291 Incident Analysis

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Crowdstrike Report

1.1 Channel File 291 Incident

Friday July 19, 2024, CrowdStrike, a leading cybersecurity firm, released an update to its Falcon Sensor software designed for Windows-based systems. The update, intending to enhance threat detection single-handedly, disrupted the global IT infrastructure, causing widespread system crashes across various industries (e.g., airlines, healthcare, and banking) [10].

The outage costed fortune **500 companies approximately \$5.4 billion** in damages, after an estimated **8.5 million devices** were struck by the blue screen of death (BSoD) [28][14].

1.2 Context and Background

CrowdStrike's Founder and CEO George Kurtz, addressed the public on live TV, stating "That we're deeply sorry for the impact we've caused" [26]. Though this isn't the first time George Kurtz has been caught in the crossfire of a cybersecurity incident. In 2019, George Kurts the customerfacing Field Chief Technology Officer at McAfee, released a faulty update. The update, mistakenly identified a critical Windows system file (svchost.exe) as malware, causing the system to endlessly loop [29].

In a blog posted by CrowdSTrike "as of 8:00 p.m. EDT on July 29, 2024, 99% of Windows sensors were back online" [8]. The incident was said to occur due to a bug which expected 20 input fields instead of 21, causing the software to crash. Channel File 291 was identified the culprit and was removed from the software [8].

1.3 Modern Endpoint Security

First we will break down what exactly the Falcon Sensor is. The Falcon Sensor claims to be a lightweight agent installed on endpoint devices to monitor and record system activity. Ensuring **endpoints** means ensuring devices that connect to a network, such as laptops, desktops, and mobile devices. **Endpoint security** is the process of securing the various points at which a device connects to a network. 90% of successful breaches and 70% of data breaches originate at endpoint, costing companies millions [12].

Since many large scale companies have moved to the cloud, and many working from home, ever more devices are connecting to sensitive data. This means many endpoint solutions constantly monitor and record system activity to detect and prevent threats. This in itself utilizes cloud-based systems to access threat intelligence, providing autonomous real-time protection [3]

Many original anti-viruses signature based, protecting endpoints on a device by scanning for known malware—Indicators of Attack (IOA). This relied on a database of known malware signatures. CrowdStrike and many others have opted to use next-gen anti-virus (NGAV) machine learning Technology, to aid in detecting newer types of IOA vectors that are often fileless, by monitoring system memory [13].

1.4 EPP & EDR Anti-virus Solutions

Endpoint Protection Platforms (EPP) like CrowdStrike may include the following features as defined by IBM [12]:

- Web control and content filtering: protects against malicious code in websites and user downloaded content. While providing a whitelist of approved websites.
- Data classification and data loss prevention (DLP): identifies and classifies sensitive data, preventing unauthorized access and data loss.
- Firewall: monitors and controls incoming and outgoing network traffic based on configured security rules.
- Email Gateway: scans incoming email attachments and links for malicious content.
- Application control: restricts the programs that users can run on their devices.

CrowdStrike's **Endpoint Detection and Response (EDR)** solution Falcon Sensor, part of the Falcon Platform, is at the root of the issue. EDRs are a class of security tools that go beyond known threats, to monitor files entering and applications running on a system. These **Correlate Indicators of Compromise (IOC)** systems, aggregate data from various sources—network traffic, unusual user behavior, inconsistent permissions, system configuration changes, unverified software or domains, repetitive file access, and more [18].

These systems aren't just designed to detect threats, but respond to them while an attack is in progress. This incurs IOCs many log based solutions such as **extended detection and response** (**XDR**), and **security information and event management (SIEM)** systems to mitigate and isolate threats, going as far as to shut down a system if necessary. These systems typically rely on AI to establish a baseline of normal activity and detect deviations from it [18].

1.5 CrowdStrike Falcon Sensor Distinctions

The immediate reason why CrowdStrike's Falcon Sensor update caused such a widespread outage was due to the software living on at kernel level. These differ from traditional user-mode applications that crash in isolation. Kernel-level applications are more privileged living at the heart of the operating system—if it crashes, the whole system crashes. This process is known as **kernel panic**, which stops the system from potentially corrupting beyond repair [1].

CrowdStrike notes three main kernel-level component features that it complies with from the Microsoft's anti-virus kernel APIs [13]:

- Kernel Patch Protection (KPP): also known as PatchGuard, prevents third-party software from modifying the Windows kernel. Available on 64-bit (x64) Window systems, but by-passable on 32-bit (x86) systems, CrowdStrike opts to never patch the kernel. Other anti-virus choose this route, which can lead to system instability if not done correctly [4].
- Kernel-Mode Code Signing (KMCS): CrowdStrike complies with Microsoft's KMCS requirements, which ensures that all kernel-mode code obtains a Extended Validation (EV) Code Signing Certificate from a trusted Certificate Authority (CA) [19][24].

• Object Callbacks: a feature that allows CrowdStrike to subscribe to various kernel events, such as file creation, registry access, and network activity. Instead of kernel hooking, which intercepts system calls [17].

CrowdStrike further justifies its kernel presence to protect against for Early Boot Protection (EBP) and which Microsoft supports with its Early Launch Anti-Malware (ELAM) driver [13]. This protects against rootkits, which are malware that can hide from the operating system, by loading before the operating system itself. Having this protection in place, stops attackers from sticking USBs into airport kiosks or hotel computers [2].

1.6 Faulty Code and Production Updates:

Despite CrowdStrike Falcon Sensor passing Windows Hardware Compatibility Program (WHCP) certifications, and validations through Windows Hardware Lab Kit (HLK) testing, the update still slipped through [20]. However, anti-virus software only needs to pass the WHCP and HLK tests once. They only certify that the driver running on the system is stable. Once the driver is installed, CrowdStrike can push updates—without re-certification—in a cloud-based process they call Rapid Response Content (RRC) [9].

This process entirely relies on CrowdStrike's internal deploy and testing pipelines. CrowdStrike's testing negligence, did not thoroughly test the update, during their RRC update to its Falcon Sensor software. Typically a software companies employ Continuous Integration/Continuous Deployment (CI/CD) pipelines to catch these issues. CI/CD pipelines are characterized by multiple rounds of manual written tests, peer reviewed code, and automated stress testing to ensure the software compiles safely before deployment [11]. These tests comprise of unit tests, integration tests, and end-to-end (E2E) tests to ensure the software is functioning as expected. Unit tests test individual components of the software, integration tests test how the components interact, and E2E, running the application in production-like environments (e.g., test and development environments before production) in a suite of integration tests to ensure stability. CrowdStrike lacked the CI/CD security to catch Channel File 291, a bug that effectively threw an out-of-bounds error.

1.7 CrowdStrike Incident Report

Before jumping into CrowdStrike's incident analysis, we must first understand the technical terms used in the analysis [9]:

- Falcon OverWatch[®] and Falcon Complete[™]: OverWatch is a 24/7 managed threat hunting service led by human intelligence. Complete is a managed detection and response (MDR) service, which is a suite of tools and services including OverWatch, to detect and remediate threats [5][6][7].
- 2. Security Telemetry & Graph Store: Telemetry is the aggregation of data from various sources (e.g., endpoints, servers, network devices) [23]. These analytics are are stored locally on the Falcon Sensor's sensors in a graph database. Graph databases store information in nodes and edges to represent the relationship between data points [21].

Falcon Sensor's interprets relationships in flowing memory to detect possible IOAs.

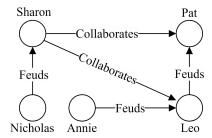


Figure 1.1: Graph Example Depicting Relationships Between Co-workers

- 3. **Template Types**: Template types push telemetry data to a regular-expression (RegEx) engine Content Interpreter. Template types outline predefined schemas of security criteria to evaluate. **Template Instances** are live configurations, defining parameters, thresholds, and conditions to trigger alerts.
- 4. Channel Files: Each Falcon sensor defines a channel file, which is configured with a template type. RRCs then push threat intelligence to channel files. Template instances then compare the security telemetry to determine IOAs.

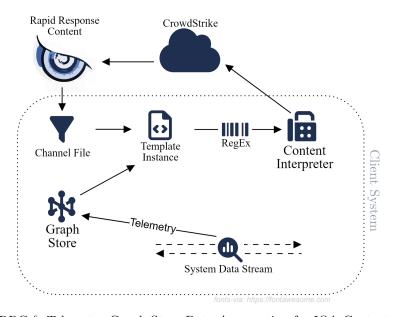


Figure 1.2: RRC & Telemetry Graph Store Data Aggregation for IOA Content Interpreter.

February 2024, CrowdStrike released sensor version 7.11, introducing a new template type. The template type target a new IOA vector relating to **Windows Interprocess Communication** (IPC) mechanisms—notably **Named Pipes**. Named pipes facilitate communication between processes on the same or different machines. The exploit enabled an adversary to execute code and impersonation leading to privilege escalation [25].

This release included a new IPC template type. RRC delivers IPC template instances to **Channel File 291**. This new template type defined 21 input fields, while the Content Interpreter still expected 20. This evaded detection as the Content Interpreter identified files based on a wildcard matching pattern.

Listing 1.1: Wildcard Pattern Matching Example

```
*: Matches any sequence
?: Matches any single character
Input: txt = ''abcdef'', pattern = ''a?c*''
Output: true
Reason: '?' matches with 'b' and '*' matches with ''def''.
```

(As CrowdStrike has mentioned their use of RegEx before, it is likely that the Content Interpreter used a RegEx pattern to match fields.)

On July 19, 2024, the RRC push two new IPC template instances to Channel—one of which dropped wildcard matching. This required the Content Interpreter to check the 21st field from Channel File 291. However, the Content Interpreter expected 20 fields, causing an out-of-bounds error, crashing the Falcon Sensor. This error caused the BSoD that Friday afternoon affecting 8.5 million devices.

1.8 Windows Kernel Crash Dump Analysis

David Weston, Vice President, Enterprise and OS Security at Microsoft, posted in an incident the kernel crash dump from Channel File 291 [30]. The Microsoft team's **Windows Error Reporting** (**WER**) kernel crash dumps analysis involved **WinDBG Kernel Debugger**, and several other freely accessible debugging extensions.

Code Dump Continued on Next Page.

Listing 1.2: WinDBG Kernel Crash Dump

```
1 FAULTING_THREAD:
                   ffffe402fe868040
2 READ_ADDRESS: fffff840500000074 Paged pool
3 MM_INTERNAL_CODE:
                    2
4 IMAGE_NAME: csagent.sys
5 MODULENAME: csagent
6 FAULTINGMODULE: fffff80671430000 csagent
7 PROCESS_NAME: System
8
9 TRAP_FRAME: ffff94058305ec20 — (.trap 0xffff94058305ec20)
10 .trap 0xffff94058305ec20
11 NOTE: The trap frame does not contain all registers.
12 Some register values may be zeroed or incorrect.
15 rip=fffff806715114ed rsp=ffff94058305edb0 rbp=ffff94058305eeb0
   r8 = ffff840500000074 r9 = 000000000000000 r10 = 000000000000000
nv up ei ng nz na po nc
19 iopl=0
20 csagent+0xe14ed:
21 fffff806 '715114ed 458b08 mov r9d, dword ptr [r8] ds: ffff8405 '00000074=???...
22 .trap
23 Resetting default scope
24
25 STACK_TEXT:
26 fffff9405 '8305 e9f8 ffffff806 '5388 c1e4 . . . : nt!KeBugCheckEx
27 ffff9405 '8305ea00 fffff806 '53662d8c...: nt!MiSystemFault+0x1fcf94
28 ffff9405 '8305eb00 fffff806 '53827529...: nt!MmAccessFault+0x29c
29 fffff9405 '8305ec20 ffffff806 '715114ed ...: nt!KiPageFault+0x369
30 fffff9405 '8305edb0 ffffff806 '714e709e ...: csagent+0xe14ed
31 fffff9405 '8305 ef50 ffffff806 '714 e8335 ...: csagent+0xb709e
32 fffff9405 '8305f080 ffffff806 '717220c7...: csagent+0xb8335
33 fffff9405 '8305f1b0 ffffff806 '7171ec44 ...: csagent+0x2f20c7
34 fffff9405 '8305f430 ffffff806 '71497a31 ...: csagent+0x2eec44
35 fffff9405 '8305f5f0 ffffff806 '71496aee ...: csagent+0x67a31
36 fffff9405 '8305f760 ffffff806 '7149685b...: csagent+0x66aee
37 fffff9405 '8305f7d0 ffffff806 '715399ea...: csagent+0x6685b
38 ffff9405 '8305f850 fffff806 '7148efbb...: csagent+0x1099ea
39 fffff9405 '8305f980 ffffff806 '7148edd7...: csagent+0x5efbb
40 fffff9405 '8305 fac0 ffffff806 '7152 e681 ...: csagent+0x5edd7
41 ffff9405 '8305 faf0 fffff806 '53707287...: csagent+0xfe681
42 fffff9405 '8305fb30 ffffff806 '5381b8e4...: nt!PspSystemThreadStartup+0x57
43 fffff9405 '8305fb80 00000000 '000000000...: nt!KiStartSystemThread+0x34
```

[Modified to fit page with '...' usage.]

WER shows a compressed crash dump view, so prior calls leading to the crash aren't shown.

```
Listing 1.3: Debugging csagent.sys Module (# comments)
  6: kd> .trap 0xffff94058305ec20 # user debugging command
  .trap 0xffff94058305ec20
3 # Displays the CPU's register states at the time of the crash.
4
5 NOTE: The trap frame does not contain all registers.
  Some register values may be zeroed or incorrect.
  9 rip=fffff806715114ed rsp=ffff94058305edb0 rbp=ffff94058305eeb0
10 \quad r8 = ffff840500000074 \quad r9 = 000000000000000 \quad r10 = 0000000000000000
11 # 'rip': Faulting instruction pointer address.
12 # 'r8': Address being accessed; points to 'ffff840500000074' (invalid memory).
13
14 \quad csagent + 0xe14ed:
15
  fffff806 '715114ed 458b08 mov r9d, dword ptr [r8]
  # Faulting instruction: attempts to read a 32-bit value from address stored in 'r8'.
16
17
  6: kd>!pte_ffff840500000074
18
19
  # Examines the Page Table Entry (PTE) for the address 'ffff840500000074.'
20 # PTEs map virtual addresses to physical memory.
21
22 !pte ffff840500000074
23 VA ffff840500000074
24 PXE at FFFFABD5EAF57840
                             PPE at FFFFABD5EAF080A0
25 PDE at FFFFABD5E1014000
                             PTE at FFFFABC202800000
                              contains 00000000000000000
26 contains 0A00000277200863
27
  pfn 277200
                ----DA--KWEV
                              contains 00000000000000000
  not valid
29
  # The PTE indicates that the address is not valid (not mapped in memory).
30
  6: kd> ub fffff806 '715114ed
31
32 # Unassembles instructions backward from the address 'fffff806715114ed'.
33 # Helps analyze the code that led to the faulting instruction.
34
35 \quad csagent + 0xe14d9:
36 fffff806 '715114d9 04d8
                               add
                                      al,0D8h
  ffffff806 '715114db 750b
                                      csagent+0xe14e8 (fffff806715114e8)
37
                               ine
38 ffffff806 '715114dd 4d85c0
                               test
                                      r8, r8
39 # The above checks if 'r8'
                              is NULL. The below (je) jumps if 'r8' is NULL.
                                      csagent+0xe14f4 (fffff806715114f4)
40 ffffff806 '715114e0 7412
                               jе
41 ffffff806 '715114e2 450fb708
                                      r9d, word ptr [r8]
                              movzx
42 # below is where the (je) jumps to if 'r8' is NULL, avoiding the 'r8' read above.
43 ffffff806 '715114e6 eb08
                                      csagent+0xe14f0 (fffff806715114f0)
                              jmp
```

```
44
   6: kd> u fffff806 '715114eb
46 # Unassembles instructions forward from the address 'fffff806715114eb'.
47 # Provides context for what happens after the faulting instruction.
48
49 csagent+0xe14eb:
50 ffffff806 '715114eb 7407
                                               csagent+0xe14f4 (fffff806715114f4)
                                       jе
                                               r9d, dword ptr [r8]
51 ffffff806 '715114ed 458b08
                                      mov
                                              from 'r8' (invalid memory).
52 # Faulting instruction: attempts
                                      to read
53 ffffff806 '715114f0 4d8b5008
                                               r10, qword ptr [r8+8]
                                      mov
54 fffff806 '715114f4 4d8bc2
                                               r8, r10
                                       mov
55 fffff806 '715114f7 488d4d90
                                               rcx, [rbp-70h]
                                       lea
56 fffff806 '715114fb 488bd6
                                       mov
                                               rdx, rsi
57 ffffff806 '715114fe e8212c0000
                                       call
                                               csagent+0xe4124 (fffff80671514124)
58
59 6: kd> db ffff840500000074
60 # Dumps the raw memory content at the address 'ffff840500000074'.
61
62 db ffff840500000074
63 ffff8405 '00000074
                       ?? ?? ?? ?? ??
                                      ?? ?? ??-?? ??
                                                      ??
                                                         ??
                                                            ??
                                                                ??
64 ffff8405 '00000074
                       ??
                                       ??
                                                      ??
65 ffff8405 '00000084
                       ??
                          ??
                             ??
                                ??
                                    ??
                                       ??
                                          ??
                                             ??-??
                                                   ??
                                                      ??
                                                         ??
                                                             ??
                                                                ??
                                                                   ??
                                                                      ??...
                       ??
                          ??
                             ??
                                    ??
                                      ??
                                          ??
                                             ??-??
                                                   ??
                                                      ??
                                                         ??
                                                             ??
                                                                   ??
66 ffff8405 '00000094
                                ??
                                                                ??
                       ?? ??
                                ?? ??
                                      ??
                                          ??
67 ffff8405 '000000a4
                             ??
                                             ?? - ??
                                                   ??
                                                      ??
                                                         ??
                                                             ??
68 ffff8405 '000000b4
                       ?? ??
                             ??
                                ??
                                    ??
                                      ??
                                         ??
                                                   ??
                                                      ??
                                                         ??
                                                             ??
                                          ??
69 ffff8405 '000000c4
                       ??
                          ??
                             ??
                                ??
                                    ??
                                      ??
                                             ?? - ??
                                                   ??
                                                      ??
                                                         ??
                                                             ??
70 ffff8405 '000000d4
                       ??
                          ??
                             ??
                                ?? ??
                                      ??
                                          ??
                                             ?? - ??
                                                   ??
                                                      ??
                                                         ??
                                                             ??
                      71 ffff8405 '000000e4
72 # The memory dump shows all '??', meaning the address is invalid or not mapped.
```

Lines 63-71 show that indeed 'r8' was reading from an invalid memory address, lining up with CrowdStrike's analysis of an out-of-bounds error.

Code Dump Continued on Next Page.

Listing 1.4: Inspecting csagent.sys

```
6: kd>!reg querykey \REGISTRY\MACHINE\system\ControlSet001\services\csagent
1
2
3
   Hive
                 ffff84059ca7b000
4
   KeyNode
                 ffff8405a6f67f9c
5
   [SubKeyAddr]
                          [SubKeyName]
6
   ffff8405a6f683ac
                          Instances
7
   ffff8405a6f6854c
                         Sim
8
9
10
   Use '!reg keyinfo ffff84059ca7b000 <SubKeyAddr>' to dump the subkey details
11
12
   [ValueType]
                  [ValueName]
                                     [ValueData]
                                     2
13 REG.DWORD
                  Type
14 REG.DWORD
                  Start
                                     1
                  ErrorControl
15 REG.DWORD
                                     1
16 REG_EXPAND_SZ ImagePath
                                     C: \ Windows \ system 32 \ drivers \ CrowdStrike \ csagent. sys
                  DisplayName
                                     CrowdStrike Falcon
17 REG_SZ
                                     FSFilter Activity Monitor
18 REG_SZ
                  Group
                  DependOnService
19 REG_MULTI_SZ
                                     FltMgr\0
20 REG_SZ
                  CNFG
                                     Config.sys
21 REG_DWORD
                  SupportedFeatures f
```

Upon inspecting csagent.sys, we verify that csagent.sys is a **File System Filter Driver (FLT)** (line 18-19). FLT drivers are often used by anti-virus software to receive file system event notifications. This also verifies CrowdStrike usage of object callbacks to subscribe to kernel events. Additionally the FLT API provides support for IPC monitoring, which aligns with CrowdStrike's new template type.

Code Dump Continued on Next Page.

Listing 1.5: Inspecting csagent.sys

```
!ca_ffffde8a870a8290
1
2
3
                  @ ffffde8a870a8290
   ControlArea
4
   Segment
                   ffff...0
                              Flink
                                           ffff...
                                                      Blink
                                                                     ffffde8a870a7d98
5
   Section Ref
                           0
                              Pfn Ref
                                                  b
                                                      Mapped Views 0
                              WaitForDel
  User Ref
                           0
                                                  0
                                                      Flush Count
   File Object
                   f\,f\,f\,f\,\dots\,0
                              ModWriteCount
                                                  0
                                                      System Views 0
7
8
   WritableRefs
                           0
                              PartitionId
                                                  0
  Flags (8008080) File WasPurged OnUnusedList
9
10
   \Windows\System 32\drivers\CrowdStrike\C-00000291-00000000-00000032.sys
11
12
13
   1: kd>!ntfskd.ccb_ffff880ce06f6970
14
   !ntfskd.ccb ffff880ce06f6970
15
16
   Ccb: ffff880c 'e06f6970
17
   Flags: 00008003 Cleanup OpenAsFile IgnoreCase
18
   Flags2: 00000841 OpenComplete AccessAffectsOplocks SegmentObjectReferenced
19
        Type: UserFileOpen
20
   FileObj: ffffde8a879b29a0
21
22
   (018) ffff880c 'db937370
                                FullFileName:
23
   \lceil \text{Windows} \setminus \text{System } 32 \setminus \text{drivers} \setminus \text{CrowdStrike} \setminus \text{C} - 00000291 - 00000000 - 00000032. sys} \rceil
   # The above confirms the file path of the Channel File 291.
24
   (020) 000000000000004C
                                LastFileNameOffset
26
   (022) 000000000000000000
                                EaModification Count
27
   (024) 00000000000000000
                                NextEaOffset
28
   (048) FFFF880CE06F69F8
                               Lcb
   (058) 000000000000000002
                               TypeOfOpen
```

Line 23 (modified to fit page) shows the full file path of Channel File 291, confirming the file path of the Channel File 291. There was no need to analyze the content of the file as the crash was due to an out-of-bounds error. The crash dump is not publicly available, though the microsoft team confirms the out-of-bounds error in the Channel File 291.

Despite Microsoft confirming the issues caused by CrowdStrike, this does not absolve their CI/CD practices. This should not go unnoticed, especially considering that this incident Kurtz's first. His leadership warrants a careful review, as the company's test-driven development seem to fall largely behind industry standards. The lack of end-to-end testing introduced critical security vulnerabilities within their CI/CD pipelines. Such an erroneous mistake could have been easily caught in a test or development environments, raising substantial concerns. Even though customers managed to recover from the incident, but CrowdStrike continues to face severe legal repercussions.

1.9 Legal Issues Raised by CrowdStrike Outage

These critical lapses in CrowdStrike's CI/CD practices has led to significant legal repercussions including a \$500 million dollar lawsuit filed by Delta Airlines. Delta Airlines, one of the many companies affected by the outage, sued CrowdStrike for the damages caused by the outage. [27] The lawsuit alleges that CrowdStrike's negligence in testing and deploying the update caused the outage, leading to \$500 million in losses for Delta Airlines. Despite this lawsuit, it is likely that CrowdStrike will walk away from this lawsuit scott-free, as Delta's stance of CrowdStrike's breach of contract and negligence will be extremely difficult to prove in court. CrowdStrike's faulty code and production updates may be deemed as not convincing enough to hold them accountable for the damages caused by the outage. "It's one thing to claim faulty software caused an outage, he says, but another to prove Crowdstrike didn't take adequate precautions on testing or monitoring", claimed liability lawyer Ramzy Ladah. [16] At this point, it seems likely that Delta will lose the lawsuit, as CrowdStrike's negligence in testing and deploying the update will be difficult to prove in court.

Delta's lawsuit won't be the only legal repurcussion that CrowdStrike will face. They are to face a class-action lawsuit from the 8.5 million devices that were affected by the outage as well. Moving past the actual legal repurcussions, it is interesting to see that for the scope of the outage, CrowdStrike has not faced any legal repurcussions from the government. In contrast, Snowflake, an AI cloud-based data company, was subject to an investigation by the SEC for its cyber breach that posed the threat of data leakage. [15] This raises the question of why CrowdStrike has not faced any legal repurcussions from the government despite its severity of the outage. This could be due to the fact that Snowflake had issues regarding the mismanagement of customer data in contrast to CrowdStrike's incident while damaging, did not pose a threat to the data of its customers.

However, an important point to make notice of, is the fact that CEO George Kurtz has been in a similar situation before with McAfee. Considering the frequency of vulernabilities like this, there must be an industry/government standard that companies should adhere to. While some frameworks, such as ISO 27001, exist to guide organizations in securing their information systems, there is no universally mandated standard specifically addressing the testing, deployment, and monitoring practices in CI/CD pipelines. This lack of regulation allows companies to cut corners around the thorough testing required to ensure security and stability. It is vital that the United States adheres to a standard, such as the EU's NIS2 Directive that requires companies to meet minimum benchmarks. Some of these benchmarks include rigorous pre-deployment testing and third-party audits. [22] Initiatives like this is what keeps companies in the EU above standard, and until now there have not been any publicly reported cases of companies facing fines under the NIS2 Directive. This is a testament to the effectiveness of the NIS2 Directive in ensuring that companies adhere to a standard that protects their customers. Considering this, the United States must follow suit such that we can prevent incidents like CrowdStrike's outage from happening in the future. Aside from the legal aspects of CrowdStrike, there are also various ethical issues that arose from the outage to consider.

1.10 Ethical Issues Raised by CrowdStrike Outage

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