Chip and Skim: cloning EMV cards with the pre-play attack

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Abstract

EMV, also known as “Chip and PIN”, is the leading system for card payments worldwide. It is used throughout Europe and much of Asia, and is starting to be introduced in North America too. Payment cards contain a chip so they can execute an authentication protocol. This protocol requires point-of-sale (POS) terminals or ATMs to generate a nonce, called the unpredictable number, for each transaction to ensure it is fresh. We have discovered that some EMV implementers have merely used counters, timestamps or home-grown algorithms to supply this number. This exposes them to a “pre-play” attack which is indistinguishable from card cloning from the standpoint of the logs available to the card-issuing bank, and can be carried out even if it is impossible to clone a card physically (in the sense of extracting the key material and loading it into another card). Card cloning is the very type of fraud that EMV was supposed to prevent. We describe how we detected the vulnerability, a survey methodology we developed to chart the scope of the weakness, evidence from ATM and terminal experiments in the field, and our implementation of proof-of-concept attacks. We found flaws in widely-used ATMs from the largest manufacturers. We can now explain at least some of the increasing number of frauds in which victims are refused refunds by banks which claim that EMV cards cannot be cloned and that a customer involved in a dispute must therefore be mistaken or complicit. Pre-play attacks may also be carried out by malware in an ATM or POS terminal, or by a man-in-the-middle between the terminal and the acquirer. We explore the design and implementation mistakes that enabled the flaw to evade detection until now: shortcomings of the EMV specification, of the EMV kernel certification process, of implementation testing, formal analysis, or monitoring customer complaints. Finally we discuss countermeasures.

1 The Smoking Gun

EMV is now the leading scheme worldwide for debit and credit card payments, as well as for cash withdrawals at ATMs, with more than 1.34 billion cards in use worldwide. US banks were late adopters, but are now in starting to issue EMV cards to their customers. EMV cards contain a smart card chip, and are more difficult to clone than the magnetic-strip cards that preceded them.

EMV was rolled out in Europe over the last ten years, with the UK being one of the early adopters (from 2003–5). After it was deployed, the banks started to be more aggressive towards customers who complained of fraud, and a cycle established itself. Victims would be denied compensation; they would Google for technical information on card fraud, and find one or other of the academic groups with research papers on the subject; the researchers would look into their case history; and quite often a new vulnerability would be discovered.

The case which kicked off the research we report here was that of a Mr Gambin, a Maltese customer of HSBC who was refused a refund for a series of transactions that were billed to his
card and which HSBC claimed must have been made with his card and PIN at an ATM in Palma, Majorca on the 29th June 2011. In such cases we advise the fraud victim to demand the transaction logs from the bank. In many cases the banks refuse, or even delete logs during the dispute process, leaving customers to argue about generalities. Some courts have recently criticised banks for this and in the Gambin case the bank produced detailed log data. We observed that one of the fields on the log file, the “unpredictable number” or UN, appeared to be increasing steadily:

| Date         | Time     | UN       |
|--------------|----------|----------|
| 2011-06-29   | 10:37:24 | F1246E04 |
| 2011-06-29   | 10:37:59 | F1241354 |
| 2011-06-29   | 10:38:34 | F1244328 |
| 2011-06-29   | 10:39:08 | F1247348 |

The UN appears to consist of a 17 bit fixed value and the low 15 bits are simply a counter that is incremented every few milliseconds, cycling every three minutes.

We wondered whether, if the “unpredictable number” generated by an ATM is in fact predictable, this might create the opportunity for an attack in which a criminal with temporary access to a card (say, in a Mafia-owned shop) can compute the authorisation codes needed to draw cash from that ATM at some time in the future for which the value of the UN can be predicted. We term this scenario the “pre-play” attack.

We discovered that several ATMs generate poor random numbers, and that attacks are indeed possible. Following our responsible disclosure policy, we informed bank industry organisations in early 2012 so that ATM software can be patched. We are now publishing the results of our research so that customers whose claims for refund have been wrongly denied have the evidence to pursue them, and so that the crypto, security and bank regulation communities can learn the lessons. These are considerable. For engineers, it is fascinating to unravel why such a major failure could have been introduced, how it could have persisted undiscovered for so long, and what this has to tell us about assurance. At the scientific level, it has lessons to teach about the nature of revocation in cryptographic protocols, the limits of formal verification, and the interplay between protocol design and security economics.

The rest of this paper is organised as follows. In Section 2, we give the high-level background, telling the history of EMV and discussing its effect on fraud figures overall. In Section 3 we give the technical background, describing how an EMV transaction works. Section 4 describes our experimental methods and results: how we developed a data capture card to harvest UN sequences from ATMs, and what we learned from examining second-hand ATMs bought on eBay. Section 5 presents our scientific analysis: what the crypto and security communities should take away from this, how EMV can be made more robust, and how such failures can be made less likely in future large-scale systems that employ cryptography for authentication and authorisation. Finally in Section 6 we draw some conclusions.

2 Background

EMV (named after its original developers Europay, MasterCard and Visa) was developed in the mid 1990s to tackle the developing threat of magnetic strip card counterfeiting, where organised crime gangs with access to card manufacturing equipment produced cloned cards using data from discarded receipts, or skimmed surreptitiously from legitimate cards, first at point-of-sale (POS) and later at automated teller machines (ATMs). The payment terminal
executes the EMV protocol with the chip, which exchanges selected transaction data sealed with a cryptographic message authentication code (MAC) calculated using a symmetric key stored in the card and shared with the bank which issued the card (the “issuer”). The idea is that the bank should be able to detect a counterfeit card that does not contain this key, and the physical tamper-resistance of the chip should prevent an attacker from extracting the key.

Many countries, including the UK, moved to authenticating cardholders with a PIN rather than a signature at both POS and ATM, where previously PINs had only been used at ATMs. The goal was to make it harder to use a stolen card. This simultaneous introduction gave rise to the term “Chip and PIN” being commonly used in the English-speaking world to refer to EMV. In layman’s terms, the chip protects against card counterfeiting, and the PIN against stolen card abuse.

EMV did not cut fraud as its proponents predicted. While using counterfeit and stolen cards did become more difficult, criminals adapted in two ways, as can be seen from Figure 1. First, they moved to “card-not-present” transactions – Internet, mail-order, and phone-based payments – which remained beyond the scope of EMV.

Second, they started making magnetic-strip clones of EMV cards. There had always been some ATM “skimming” where crooks put devices on ATM throats to capture card data and record PINs; and now that PINs were demanded everywhere and not just at ATMs, the opportunities for skimming increased hugely. The simultaneous deployment of EMV with magnetic strip meant that fallback and backwards-compatibility features in EMV could be exploited; for several years, all ATMs would still accept mag-strip cards, and even once this started to be phased out in the UK for locally-issued cards, it was still possible to use mag-strip clones of UK cards in ATMs in the USA. This is why, soon after the completion of the UK EMV roll-out in 2005, counterfeit fraud went up. Instead of entering PINs only at ATMs, customers were now
entering their PIN in POS terminals, which are much easier to tamper with [6].

Total fraud levels were brought down following 2008 through improvements to back-end fraud detection mechanisms which reject suspicious transactions; by more aggressive tactics towards customers who dispute transactions; and by reducing the number of UK ATMs that accept “fallback” magnetic-strip transactions on EMV-issued cards. Fallback fraud is now hard enough to push the criminal community to more sophisticated smart-card-based attacks.

Prior research showed that it was possible to use a stolen EMV card in a POS device without knowing the PIN. Given a suitable man-in-the-middle device, a crook can trick the terminal into believing that the right PIN was entered, while the card thought it was authorising a chip-and-signature transaction [14]; criminals have now gone on trial in France for exploiting this “no pin” vulnerability [16].

However, the “no pin” vulnerability does not explain the large number of people who have contacted the authors having been refused a refund for a fraudulent ATM transaction which they adamantly deny having made. One such case was that of Alain Job who sued his bank for a refund, but lost after the judge concluded that the customer’s card was probably used, not a clone [10]. In that case, the bank destroyed the log files despite the fact that a dispute was underway, contrary to Visa guidelines, and the judge warned that a court might not be so tolerant of such behaviour in the future.

The number of such cases is unknown. The UK fraud figures quoted above only count losses by banks and by merchants, not those for which customers are blamed; and since the introduction of EMV, the banks have operated a “liability shift” as they describe it, which means that when a transaction is disputed, then if a PIN was used the customer is held liable, while if no PIN was used the transaction is charged back to the merchant. This may be ideal from the banks’ viewpoint but is less so for their customers. The 2008/2009 British Crime Survey [12] found that 44% of fraud victims didn’t get all their money back, despite both bank guidelines and the European Payment Services Directive requiring that customers who have not acted negligently or dishonestly be refunded. Of the 44% who were not fully refunded for their losses, 55% lost between £25 and £499 ($40 to $790) and 32% lost £500 or more. So there’s a large gap between the banks’ statistics and those from the crime survey. We believe that the vulnerability we expose in this paper could explain some of it.

3 Overview of an ATM transaction

An EMV transaction consists of three phases:

1. **card authentication** in which card details are read and authenticated by the ATM or POS terminal;

2. **cardholder verification** in which the person who presents the card is verified whether by PIN or signature; and

3. **transaction authorization** in which the issuing bank decides whether the transaction should proceed.

The principals are the card, the ATM and the issuer\(^1\). The process is illustrated in Figure 2. The description below has been somewhat simplified, and represents typical UK transaction flow. Other countries may differ slightly, but will be substantially similar.

\(^1\)The bank that operates the ATM (the acquirer) and the network that links the issuer to the acquirer are also involved in settlement, dispute resolution and assurance, but they do not participate in the authentication protocol run other than to route messages, so have been omitted from the discussion in this section.
During card authentication, the card provides data records to the ATM, which include the card number, start and expiry dates and which protocol options the card supports. The card also provides a static RSA digital signature over selected records, which aims to prevent crooks from fabricating cards from known or guessed account numbers. Some cards also provide dynamic signature generation capabilities, known as “Dynamic Data Authentication” (DDA).

Following card authentication, cardholder verification proceeds by signature or PIN. In an ATM transaction the card is not involved in this verification. The customer enters their PIN on the PIN pad, where it is encrypted and returned to the card issuer for verification through the ATM network.

Finally, transaction authorization is carried out. The ATM sends to the card various transaction fields: the amount, the currency, the date, the terminal verification results (TVR – the results of various checks performed by the ATM), and a nonce (in EMV terminology, the “unpredictable number” or UN). The card responds with an authorization request cryptogram (ARQC), which is a cryptographic MAC calculated over the supplied data, together with some card-provided data including the application transaction counter (ATC – a 16 bit number stored by the card and incremented on each transaction) and the issuer application data (IAD – a proprietary data field to carry information from the card to its issuer).

The ARQC is sent by the ATM to the issuer along with the encrypted PIN. The issuer verifies the PIN and checks the ARQC by recalculating the MAC over the received data fields. Additional checks include whether sufficient funds are available, that the card has not been reported stolen, and risk-analysis software does not flag the transaction as suspicious. Then the issuer returns to the ATM an authorization response code (ARC) and an authorization response cryptogram (ARPC) destined for the card.

The ARC authorises the ATM to dispense cash, which in turn passes the ARC and ARPC also to the card. The card verifies the ARPC (which is typically a MAC over the ARQC exclusive-or’d with the ARC), and returns an authenticated settlement record known as a transaction certificate (TC), which may be sent to the issuer immediately, or some time later.
as part of a settlement process.

POS transactions proceed similarly, except that cardholder verification is usually performed by sending the PIN to the card which checks it against a stored value. Whether the PIN is verified locally or online makes no difference to the attack discussed here. If a POS device generates unpredictable numbers that can in fact be predicted, then it too will be vulnerable to a pre-play attack.

3.1 EMV pre-play protocol flaws

The card sends an ARQC to the ATM to prove that it is alive, present, and engaged in the transaction. The ATM relies on the issuer to verify this and authorise the transaction. Simply replaying an ARQC should not work, because a competent issuer prevents replay by rejecting any transaction whose application transaction counter it has already seen. This prevents replay attacks but cannot assure the issuer that the ARQC was computed today rather than yesterday. To ensure freshness, a nonce is used – the unpredictable number (UN). This is a 32 bit field generated by the ATM.

The first flaw is that the EMV protocol designers did not think through carefully enough what is required for it to be “unpredictable”. The specifications and conformance testing procedures simply require that four consecutive transactions performed by the terminal should have unique unpredictable numbers [7, test 2CM.085.00]. Thus a rational implementer who does not have the time to think through the consequences will probably prefer to use a counter rather than a cryptographic random number generator (RNG); the latter would have a higher probability of failing conformance testing (because of the birthday paradox).

The latest version of the EMV specification [8, Book 4, p57] offers some guidance as to how to generate the unpredictable number, but previous versions left the algorithm entirely up to implementers. Even the suggested construction (hash or exclusive-or of previous ARQC, transaction counter and time) would not be adequate for generating a truly unpredictable number because the ARQC would be zero if the ATM was rebooted and both the time and transaction counter are predictable. Yet if the attacker can predict an “unpredictable number” ahead of time, he can harvest ARQC from a card one day and use them at the ATM the next.

The second flaw is that EMV does not include the identity of the terminal – a classic protocol mistake. While the EMV framework can support this through designation in a list of fields to be MACed in the ARQC (the CDOL1), the standard format developed by Visa (the version 10 cryptogram format [17]) requires only the terminal country code. The country in which the attacker will use its skimmed data is trivial to predict in advance. The implication is that if the attacker knows how to predict the UNs in a given make of ATM, he can harvest ARQC for use in any ATM of that type in a given country and at a given date in the future.

These protocol vulnerabilities result in a “pre-play” attack – authentication data are collected at one moment in time, and played to one of a number of possible verifying parties at some later time that is already determined when the data are harvested. The practical implementation is that a tampered terminal in a store collects card details and ARQC as well as the PIN from a victim for use later that day, or the following day, at ATMs of a given type.

For example, in the case of the ATM in Palma that started this line of research, the counter rolls over every three minutes, so an attacker might ask a card in his store for twenty ARQC at points in the 15-bit counter’s cycle. On visiting the ATM he could use his attack card to first calibrate the ATM’s counter, and then initiate transactions when the counter is expected to be at a value for which he has a captured ARQC.

This is all very well in theory, but is it viable in practice? We decided to find out.
4 Experimental Method and Results

Pre-play attacks against EMV have been discussed theoretically before, but for a real-world attack to work, there are many practical challenges. In this section we describe our own approach to them: surveying for an exploitable vulnerability, skimming data, and deploying the attack. Each stage of the process must be completed by criminals with reasonable yield and an acceptably low cost (including probability of being caught).

4.1 Identifying vulnerable ATMs

To identify vulnerable ATMs we took three approaches: analysis of log files, collection of UNs in the field, and reverse engineering of ATMs.

4.1.1 Analysis of log files

We regularly investigate ATM withdrawals on behalf of customers in dispute with their banks. In most cases the level of detail in logs provided by the bank is low, but in a minority of cases detailed logs are handed over. The Palma case got us started on this research track, and we have found one or two other cases of suspicious UNs in logs.

Following our responsible disclosure of this vulnerability to the banks and card brands, we have offered to help them analyse their log data, but have so far received little or no feedback at all. We suggest that anyone in dispute with a bank over ATM transactions where this vulnerability might be an explanation should subpoena the bank’s logs for analysis.

We have also discussed the vulnerability with a large online services firm, but it turned out that they do not retain records of the UN.

We are particularly interested in collecting UN data from Italy, which is the only country of which we are aware where UNs are routinely printed on all customer receipts.

4.1.2 Active probing of ATMs

Even where ATM logs are available, the timestamps have an accuracy of only a second or so rather than a millisecond, so perhaps only grossly non-random UN generation algorithms can be identified. For both researchers and crooks, a better data collection approach is required. This needs to be moderately covert as the public are aware of the problem of ATM skimming; using primitive analysis tools repeatedly at an ATM may be a way to get arrested.

Therefore we constructed passive monitoring cards by adding a microcontroller to existing EMV cards. (For ethical and prudential reasons we informed the Metropolitan Police that such experiments were underway; we also consulted our local ethics process.) Care was taken to ensure that the physical size of each card was not modified. The card remains a valid payment card – the transaction flow proceeds as normal – so it should always be accepted. However, it can be inserted into a variety of ATMs and POS devices without arousing suspicion. More primitive approaches with trailing wires from the slot may cause problems in ATMs that hold the card internally during reading. Figure 3 shows a payment card adapted with our circuitry.

Other possible monitoring equipment includes wireless relay cards transferring data to a card outside, a wired card adapted to be compatible with ATM card slots, an overlaid shim glued atop a thinned-down existing card, or an ultra-simple shim consisting simply of an antenna suitably connected to the card data line (which we could observe using “TEMPEST” techniques).

In the case of POS terminals, sales assistants are often briefed to turn away during PIN entry and avoid handling the customer card. Thus existing monitoring tools such as the Smart...
Card Detective [2] have been proven suitable for surreptitious use with a hidden wire running up the experimenter’s sleeve. We have used this tool to analyze unpredictable numbers from a POS terminal close to our offices, having the agreement of the POS owner.

For each ATM investigated we harvested between five and fifty unpredictable numbers by performing repeated balance enquiries\(^2\) and then a small cash withdrawal. The use of balance enquiries minimises the number of withdrawals on the card, as sudden repeated withdrawals might trigger a fraud detection system and cause the card to be retained. Such cards cost a few hundred pounds in component and labour costs so it is desirable to avoid their being captured by ATMs.

4.1.3 Reverse engineering ATM code

We were aware that black-box analysis of terminals through looking at lists of UNs would not tell the full story, so we acquired some ATMs for analysis. Figure 4 shows EMV-enabled NCR and Hanco/Triton ATMs acquired via eBay for £100 each. Some of these had been in recent service, and some were out of service, having only been used for development. Barnaby Jack [9] describes how second-hand ATMs can be brought back into service easily by simply phoning for a repairman.

Reverse engineering a functioning and captive ATM can combine the best of black-box analysis with detailed work on the algorithms and also has the potential to expose weak pseudo-random number generators such as the C `rand()` function whose output might look acceptable to black-box analysis but is entirely predictable from a couple of recorded samples.

We have yet to confirm the UN generation algorithm in any of the ATMs. Analysis has been complicated by the obsolete architectures and our work is ongoing. One ATM was running OS/2 (see Figure 5(a)), and another on primitive hardware based on the Zilog Z180 CPU (see Figure 5(c)). We identified the manufacturer of the EMV kernel from information inside the ATM, and documentation on their website [3] indicates that the EMV kernel requires seeding with an external source of randomness. Hardware analysis revealed presence of a dedicated

\(^2\) It seems all transactions at ATM are authenticated by EMV protocol runs, but some with a zero withdrawal amount.
Figure 4: ATMs acquired for reverse-engineering

(a) Extracting disk image from NCR ATM

(b) Board with DES chip from Triton ATM

(c) CPU board from Triton ATM

Figure 5: Detail of hardware reverse engineering
crypto chip implementing DES (see Figure 5(b)) and we theorise also containing a hardware random or pseudo-random number source. Currently we are confident that each byte of the unpredictable number is independently generated from an off-CPU resource. This would either be the DES chip, a real-time clock (also present as a separate chip) or possibly the smart card control unit which is a MagTek board accessed via a serial interface.

At the outset we believed that older, primitive platforms would be less likely to have a strong source of randomness than modern platforms in all cases. However our broader research across ATM and POS indicates a subtly different conclusion. Entirely modern platforms are likely to call the typical OS resources for random number generation, which nowadays are relatively strong. Meanwhile legacy platforms may have either strong or very weak randomness depending on whether this issue was thought about by the designers at the time. Thirdly, legacy platforms which have been ported to more modern environments are most likely to have weak randomness as during the porting the random number generator custom call on the legacy platform is simply mapped across to the easiest standard library call, such as the C `rand()` function. In summary it is as important to consider the lineage of the ATM or POS software as it is to consider the current platform when estimating likelihood of vulnerability.

### 4.2 Analysing the RNG

In Section 4.1.2 we described our own approaches to data collection. Using this approach we collected data to analyse the RNGs in EMV devices in our local area. We performed more than 1000 transactions across 22 different ATMs and five POS terminals. We were successful at locating ATMs with weak RNGs, but attackers need to go further and identify which specific UNs are most likely to occur at a predictable future time. There are three broad classes of ineffective RNG to consider:

- **an obviously weak RNG algorithm.** This includes using counters or clocks directly as the UN, homegrown algorithms which combine obvious transaction data, and severe programming errors which cause the state-space of a better algorithm to be limited (e.g. casting down to the wrong integer size, or submitting four BCD coded random bytes rather than four truly random bytes);

- **a simple RNG with little or no seeding.** There are many flavours, from a linear congruential generator, through encryption of the clock, to more messy schemes where we may find some fixed bits and some bits that cycle, or where a state machine starts off appearing random but ends up in a tight loop cycling through just a small number of values. From an embedded systems standpoint the typical options are the C standard library `time()` and `rand()` calls, neither of which have unpredictable outputs from a cryptographic point of view;

- **an RNG that can be put into a predictable state.** The simplest failure mode is a strong RNG fed by a weak source of randomness that’s restarted on power-up, so an attacker can force an outage or follow the replenishment crew. There are also systems drawing noise from an untrustworthy source, such as when an RNG uses data from previous transactions. The attacker could insert a card which seeds known values, or temporarily spoof the authorisation response from the bank, to push the RNG into a predictable state.

Table 7(a) shows a selection of data collected from various ATMs falling broadly into the first category of ineffective algorithms. ATM1 and ATM2 contain a typical characteristic, which
we denote characteristic $C$, where the high bit and the third nibble of each UN are always set to zero. 11 of 22 ATMs we looked at exhibited this characteristic. Our current levels of data allow us to prove a non-uniform hypothesis on the data from most of these 11 ATMs with a very good significance level. Table 6 shows two ten-transaction sequences from an ATM where the characteristic was proven. However further analysis beyond confirming this characteristic has not yielded statistically significant results yet. ATMs of wildly different ages and containing different operating systems exhibited characteristic $C$, so we believe it to be an artifact of a particular EMV kernel post-processing an RNG source rather than of the RNG source itself.

We suspect a number ATMs and POS will simply be using the C standard library `rand()` function, and are undertaking analysis using techniques based on spectral tests. Such analysis is complicated by the unknown levels of post-processing of the RNG: for example, we know in the case of one EMV library that each byte of the unpredictable number is sampled separately from the RNG – hence a modulo 256 or a type-cast is almost certainly post-processing the output. Multiple calls to the RNG to produce one UN is on the one hand disadvantageous in that fewer bits are available to detect state per sample, but making four consecutive calls in a row for one UN reduces the potential interference from other services within an ATM also making calls as part of the transaction process.

The third category could possibly be spotted from empirical analysis but are best detected with reverse-engineering. In Table 7(b) we show a list of stronger consecutive unpredictable numbers retrieved from a local POS terminal. Even in this case the first bit appears to remain 0, which might suggest the use of a signed integer.

Once UN generation is adequately understood, the attackers figure out what UNs to collect in order to maximise the yield in the subsequent cash-out phase. The result is a target ATM profile which is sent together with intended withdrawal amounts, country code and date to the gang tasked with harvesting the ARQCs. Once a vulnerable ATM using the known RNG is identified, and the attack flow can proceed further.

4.3 Harvesting the data

Given temporary access to an EMV card, whose holder is prepared to enter the PIN, and a range of possible unpredictable numbers to be harvested, the crook programs his evil terminal to read the static data from the card and call `GENERATE AC` to obtain an ARQC and TC for
| Counters | Weak RNGs | Stronger RNGs |
|----------|-----------|---------------|
| ATM4     | eb661db4  | POS1 013A8CE2 |
| ATM4     | 2cb6339b  | POS1 01FB2C16 |
| ATM4     | 36a2963b  | POS1 2A26982F |
| ATM4     | 3d19ca14  | POS1 39EB1E19 |
| ATM5     | F1246E04  | POS1 293FBAA9 |
| ATM5     | F1241354  | POS1 49868033 |
| ATM5     | F1244328  | (b) From local POS terminal |
| ATM5     | F1247348  |               |
| ATM3     | 650155D7  |               |
| ATM3     | 7C0AF071  |               |
| ATM3     | 7B021D0E  |               |
| ATM3     | 1107CF7D  |               |

(a) From Various ATMs

Figure 7: Categorised unpredictable numbers

each possible UN. This process could be performed by a dedicated device, or by a tampered point of sale terminal, vending machine, or ATM. The criminal could tamper with an ATM or point-of-sale terminal to perform these operations after (or instead of) a legitimate transaction. Criminals have already shown the ability to tamper with equipment on an industrial scale and with great sophistication.

For each card a set of ARQCs can be harvested, perhaps many dozens. The only limitation is the time that the card can legitimately be left in a sabotaged POS while the customer believes that the machine is waiting for authorisation. Thirty seconds is the standard authorisation time limit; this might allow for more than 100 transactions to be skimmed.

### 4.4 Cashing out

To deploy the attack against an RNG which is a fast-moving counter such as we have observed, the attacker needs to start the ATM transaction at precisely the right moment. For a counter ticking hundreds or even thousands of times a second, it is impractical to synchronise merely through timed insertion of the card into the machine. A special smart card is therefore required which observes the counter and uses an on-board clock to decide when to initiate the relevant parts of the protocol. Smart cards are allowed to delay processing responses almost indefinitely using the request more time signal (i.e. sending byte 0x60), and timely insertion to the nearest second will mean that the card should never need to delay more than a few hundred milliseconds.

This requires a card with an on-board clock which will keep working even in the absence of external power. We are developing a 16 bit microcontroller with an on-board real-time clock (RTC), powered by a capacitor when no power is supplied. The RTC is used to synchronise an internal high resolution timer once the card is powered up, and waits the necessary amount of time until the ATM arrives at the appropriate step in the EMV protocol where the unpredictable number is sampled.

The feasibility of this attack is affected by the speed of the timer, the process by which
the ATM samples the timer, and the synchronisation resolution of the card. However there are straightforward ways to relax the timing requirements. The attackers simply harvest a set of transactions with consecutive unpredictable numbers, and the attack card makes its best attempt at synchronisation. Once the card sees the unpredictable number returned by the ATM it looks this up in an internal lookup table. If the UN is not present, the card can feign failure. So if ten transactions are harvested from the skimmed card, the timing requirements can perhaps be relaxed by a factor of ten as well.

In the case of ATMs employing stateful predictable pseudo-random RNGs, none of this intricacy is necessary – the attacker simply samples the previous few unpredictable numbers and can then predict the next one. In any case, synchronisation technology can be developed and tested entirely offline against captive ATMs without any need to interact with the real payment network.

4.5 Implementation and evaluation

We have constructed proof-of-concept implementations for all stages of the attack. As discussed above, we modified a bank smart card for data collection to identify ATMs with poor UN generation. To collect card data we have implemented a Python EMV terminal implementation and modified an EMV terminal to collect card data, as shown in Figure 8. To carry out the
attack we implemented a cloned card on the ZeitControl BasicCard platform.

We used test cards with known ARQC-generation keys (UDK) to prove the viability of the attack at a protocol level. Our proof consists of an indistinguishability experiment; we take two test cards A and B loaded with the same ARQC-generation keys, initialised with the same ATC and handled identically. We use our skimming trace to harvest data from card A and then program it on to a “pre-play card”. We then compare traces between the pre-play card version of card A and the real card B, and observe that they are identical. This means that at a protocol level it is impossible for the ATM to distinguish between the real and pre-play cards. In detail the flow is as follows:

1. two transactions performed on card A
2. two transactions performed on card B
3. traces of transactions compared, \texttt{GENERATE AC} responses confirmed the same, proving both cards have the same cryptographic keys and are generating the same cryptograms (they are identical)
4. two ARQCs skimmed from card A
5. pre-play card programmed with data from data collected from card A
6. two transactions performed on card B
7. two transactions performed on pre-play card
8. traces of transaction compared and shown to be identical, confirming that pre-play card is indistinguishable from card B

4.6 Limitations and Defences

The limitations of a pre-play attack are:

- The country of attack must be chosen in advance
- The dates of attack must be chosen in advance
- The amount must be chosen in advance

We assume that the unpredictable number is known ahead of time (either due to full prediction of a pseudo-random RNG, or due to waiting until the appropriate moment to sample a looping time-based counter). It is not necessary to know the terminal ID of the ATM, or time of transaction, as these are rarely (if at all) requested by card and are not included in the generation of the ARQC. The cloned card can be used in any vulnerable ATM which shares the same country code.

The simplest fix is a cryptographically secure random number generator. The UN field is only 32 bits, and so an attacker who could collect approximately $2^{16}$ ARQCs from a card could get a decent probability of success with $2^{16}$ transactions at an ATM. This is not a realistic concern as an EMV card should disable itself after $2^{16}$ transactions, and carrying out $2^{16}$ transactions at an ATM at 20 seconds each would not only take more than a day but should rapidly propel the machine to the top of FICO’s watch list.

The problem here is that fixing the random number generator is a matter for acquiring banks, ATM vendors, merchants and POS terminal suppliers, while the cost of fraud falls on
the issuing banks and the customers. Hopefully this article will reduce the likelihood of risk being dumped unfairly on customers, but what can an issuing bank do?

If an attacker requests many ARQCs from a card, the issuer may notice gaps in the ATC sequence. Issuers should probably reject online transactions where the ATC is lower than the highest ATC seen from that card, which would limit the attack window to the next genuine card use. For offline transactions, however, this cannot be done because there might be re-ordering of cryptograms.

One limitation of the skimming processes is that the \texttt{EXTERNAL AUTHENTICATE} call (which happens during the transaction authorization, see Figure 2) cannot be made, as the ARPC cannot be generated without the issuer’s involvement. This does not impair the card’s ability to generate the ARQC (which happens before \texttt{EXTERNAL AUTHENTICATE}), but it might allow the attack to be detected by an issuer who examines the TC. The IAD field in the TC is not covered by the EMV specification, but additional standards defined by Visa [17], commonly implemented by cards, do go into more detail. A pair of bits in the IAD indicates whether \texttt{EXTERNAL AUTHENTICATE} has been performed and whether it succeeded. Although this is not suitable for preventing the attack (because the TC is only sent to the issuer once the ATM has completed the transaction), it could allow detection later.

Another approach for increasing the difficulty of the attack is to force the card to commit to the value of the ATC before the ATM presents the UN to the card. This is possible without having to modify cards, because a mandatory feature of EMV is that the \texttt{GET DATA} command retrieves the current ATC. If the pre-play card were able to exactly predict the value of the UN in a transaction, being forced to choose an ATC would not affect the difficulty. However, it would prevent the card from searching a list of available ARQCs and finding one that matches.

One set of non-defences are the public-key authentication features of EMV. The static digital signature (Static Data Authentication – SDA) included on the card can be trivially copied to the pre-play card. However, by examining records of transactions we discovered that the terminal verification results (TVR) field sent to the card during transaction authorization indicates that this digital signature was not verified. The decision not to check the digital signature could have been made by ATM manufacturers to save the time needed to verify the signature on the low-end CPUs in some ATMs (see Section 4.1.3), and the maintenance costs of updating the root certificates, because counterfeit cards should be detected during transaction authorization.

Even the public-key challenge-response protocol of EMV (Dynamic Data Authentication – DDA) would not adequately protect terminals from attack. If DDA were commonly used by ATMs (or the attack is fielded at a point-of-sale terminal) the signature response to the \texttt{INTERNAL AUTHENTICATE} command can be recorded and replayed just as the ARQC is. In our POS terminal tests the unpredictable number sent by the terminal to the card in the \texttt{INTERNAL AUTHENTICATE} command is the same as for the \texttt{GENERATE AC} command. However this gets us into the territory of what the acquiring bank might do, if forced to by changes in card scheme rules or by legal precedents. We will return to this question in the next section.

5 Discussion

The potential vulnerability of EMV to a poor random number generator was discussed in the abstract by Murdoch [13]. Markettos and Moore [11] additionally explored how otherwise secure true random number generators could be manipulated to produce more deterministic output. But this paper is the first work to show that poor random number generators exist in the wild, that they have been implicated in fraud, how they can be exploited, and that the EMV specification does not test adequately for this problem.
The exploit scenario described in this paper might be viewed as a variant of the relay attack, which was explored in the context of EMV by Drimer and Murdoch [5]. But there, the relay attack required real-time bi-directional communication with the genuine card; the genuine card had to be under the control of the attacker while the attack was taking place. This makes it hard to deploy; the best attack we can think of is to have a false terminal such as a parking meter to attract cardholders, communicating with a crook who waits with the connected false card near an ATM. We do not know of this being deployed in practice (though we’ve heard rumours). Another variant of the relay attack is the no-PIN attack where a man-in-the-middle device tricks the terminal into accepting a transaction after the wrong PIN was entered; that also works in real time. That has been deployed, and crooks have been prosecuted for it; but so far the losses appear to of the order of a million Euros, and from one or two incidents. In contrast, delays of days to weeks would be possible with the attack described in this paper, therefore making it much more feasible to industrialise.

In other respects, the pre-play attack could be seen as a kind of card cloning. We have already seen fake magnetic strip cards based on either the magnetic strip of the genuine card, or the copy of the magnetic strip data stored on the chip of some EMV cards. Another approach is the “YES-card” where the static data from a chip is copied to a cloned chip card. If the transaction can be kept offline (e.g. by keeping it below the “floor limit”), the fact that such a card cannot produce a valid ARQC or TC will not prevent the transaction, but as the YES-card is responsible for verifying the PIN, it can be programmed to accepted any PIN. The pre-play attack is more powerful in some respects as it works for online transactions, and less in others as the transaction parameters must be known in advance. Crucially, the pre-play attack will work in ATMs while a YES-card won’t (a typical YES-card attack involves buying cigarettes for resale, which is less convenient than stealing cash directly).

One might imagine that much more fraud could be committed with a fully cloned card containing a copy of the ARQC-generation keys than with a card containing pre-play data. However even a full clone will have its own ATC which will start to diverge from that of the real card and in due course be detectable. So a full cloning attack might be not that much more powerful in practice than a pre-play attack.

5.1 Attack variants

Even if the UN generation algorithms are patched, a number of powerful attack variants may make pre-play attacks viable for years to come.

- **Malware.** There are already numerous cases of malware-infected ATMs operating in Eastern Europe and depending on the internal architecture of the ATM it may be easy for such malware to sabotage the choice of UN. In fact one bank suggested to us that the ATM that kicked off this whole research project may have been infected with malware.

- **Supply chain attacks.** Such attacks have already been seen against POS terminals in the wild, and used to harvest magnetic strip data. So it is feasible that a criminal (or even a state-level adversary) might sabotage the RNG deliberately, either to act predictably all the time, or to enter a predictable mode when triggered via a covert channel. A suitably sabotaged RNG would probably only be detected via reverse engineering or observation of real world attacks.

- **Collusive merchant.** A merchant might maliciously modify their EMV stack to be vulnerable, or inject replayed card data into the authorisation/settlement system. He could take a cut from crooks who come to use cloned cards at their store, or just pre-play
transactions directly. In the UK, there was a string of card cloning attacks on petrol stations where a gang bribed store managers to look the other way when PIN pads were tampered with and monitoring devices inserted into network connections; exactly what you need to deploy a pre-play attack.

- **Terminal cut-out.** A variant is the terminal cut-out or bypass is where the transaction stream between the merchant terminal and the acquirer is hacked to misreport the unpredictable number when triggered by a particular signal (e.g. a particular account number or a known ARQC). This transaction data stream is not normally considered sensitive within the threat model and can be altered at will by merchant software. The attackers’ card performing the replay can then use any UN for which it has an ARQC, and the true random UN made up by the terminal will never see the light of day. This is hard to block: there is no provision in currently deployed EMV cards for the terminal to confirm that its choice of UN was correctly included in the cryptographic MAC. The terminal cut-out could be implemented in malware (and there’s evidence of bank botnets looking for POS devices), or in a merchant’s back-end system (we have evidence of merchants already tampering with transaction data to represent transactions as PIN-verified when they were not, so as to shift liability).

- **UN modification in the network.** A man-in-the-middle device between a POS device and the acquiring bank, perhaps at a network switch, would also be a good way to deploy such an attack. This could be an attractive way to attack merchants that process high-value transactions, such as jewelers or investment firms, who might guard their premises and take care of their POS equipment yet still fall to a targeted attack. A pre-play attack would be much harder to detect than old-fashioned attacks that just convert deny authorisation messages into approve messages.

Perhaps the main takeaway message is that an attacker who can subvert a merchant’s premises, get access to his terminal equipment (even before it is purchased), or get control of his network connection, can do transactions that are indistinguishable from card cloning to the bank that issued the EMV card – even if full card cloning is physically impossible. The EMV attack surface is a bit bigger than one might think, especially once crooks learn how to manipulate the protocol.

### 5.2 EMV protocol issues

The key shortcoming at the EMV protocol level is that the party depending upon freshness in the protocol is not the party responsible for generating it. The issuing bank depends on the merchant for transaction freshness. The merchant may not be incentivised to provide it, may not be able to deliver it correctly due to lack of end-to-end authentication with the issuer, and might even be collusive (directly or indirectly). This is somewhat outside the terms of reference of traditional academic protocol analysis.

Recently there has been some formal analysis of EMV, but this flaw was not discovered [4]. One reason is that the UN was modelled as a fresh nonce, even though this is not required by the EMV specification (this omission is understandable given that the actual specification of the UN is buried on p.1498 in an annex to the EMV specifications, totalling over 4000 pages). The other is that the issuer and terminal are modelled as the same individual, whereas in reality the relying party is the issuer and has only limited control over the terminal behaviour.

Let’s consider the EMV protocol in the traditional academic framework. The protocol might be idealised as (where A is the ATM, B is the issuer, and C is the card):
A → C : N, V, T
C → A : \{N, V, T\}_{KCB}
A → B : \{A, \{N, V, T\}_{KCB}\}_{KBA}
B → A : \{A, N\}_{KBA}

An analysis using the BAN logic [1] would note that KCB is a good key for communicating between the card and the bank, so the bank knows that the card once said N, V and T; if it concludes that N is also fresh, then it will infer that the card said all this in the current epoch. However N is not actually the card’s nonce NC, but the terminal’s nonce NT, and we can’t infer anything once we formalise it this carefully.

It is well known that the assumptions used in the 1970s by the pioneers of authentication were undermined by later “progress”. The Needham-Schroeder protocol [15], famously has a “bug” in that the protocol can stall for an extended period of time between the third and fourth messages, with the effect that old session keys once compromised cannot be revoked. Needham and Schroeder defended themselves by pointing out that their paper had quite openly assumed that principals executed the protocol faithfully; therefore such behaviour was a priori excluded from their model. Our modern world of equipment that fails from time to time, and where life is spiced by the occasional malicious insider, requires us to be more careful with revocation.

In exactly the same way, the deployment of a system like EMV across an ecosystem with hundreds of vendors, thousands of banks, millions of merchants and billions of cards requires us to be much more careful about who the principals are, and the incentives they have to execute their tasks competently. Indeed, one of the new realities of the EMV world is that merchants and banks may be hostile parties in the payment system, thanks to tussles over payment transaction charges and chargebacks. There have been large lawsuits between major retailers and payment networks, and we are aware of cases where merchants deliberately falsify record data (e.g. by claiming that transactions were PIN-verified when they were not) so as to push fraud costs to the bank and reduce chargebacks.

So if issuing banks cannot trust merchants to buy terminals from vendors who will implement decent random number generators, what can be done? The protocol specialist will say that randomness must be generated by the party that relies on it; so the terminal should request a nonce from the issuing bank before commencing the transaction. This would take a long time to implement and impose significant time and financial penalties as it requires an extra message round trip for each authorisation.

A cheaper alternative might be a rule that, in the event of a transaction dispute, it would be the responsibility of the acquiring bank to demonstrate that the unpredictable number was properly generated. The terminal equipment might support audit in various ways, such as by using a generator which encrypted an underlying sequence that is revealed after the fact, and locked to the transaction log to establish time limits on possible pre-play tampering. However, this would not be entirely trivial; secure storage of audit data in the terminal is a new problem and creates new opportunities for attack.

5.3 Evidential issues in dispute

Viability of the pre-play attack has significant legal ramifications. It can no longer be taken for granted that data in a logged transaction was harvested at the time and place claimed, which undermines the reliability of evidence in both civil and criminal cases. To show that a given transaction was made by a particular card, it is now necessary to show that the random number generator on the ATM or POS was sound.

From the point of view of an issuing bank in dispute with a customer, this attack greatly
complicates matters. The bank cannot just rely on its own log data – it must collect data from a third party (the ATM operator) to prove that the ATM was not infected with malware; that the random number generator was not vulnerable due to either design failure or a supply chain attack; and that the logs at the acquirer match those kept at the terminal itself. A mere one-off certification for a class of EMV kernel does not come close to discharging this burden. There may be practical matters in incentivising the acquiring bank to cooperate with the issuer, especially in international cases.

Under existing Visa guidelines, logs should be retained in case of dispute. Yet in recent cases we have dealt with, logs were routinely destroyed after 90 or 180 days regardless of whether a dispute was in progress. So the industry already cannot cope with dispute resolution based on issuer logs; and given that some of the disputes we’re already seeing would require scrutiny of acquirer and ATM operator systems, dispute resolution can only get harder. The only feasible way forward is by getting the liability right. Banks which destroy evidence should become automatically liable for the full sums in dispute, including costs. Above all, the burden of proof must lie on the banks, not the customer. The Payment Services Directive already requires this, yet dispute resolution bodies like the UK Financial Ombudsman Service routinely ignore the law and find for banks who destroy evidence.

5.4 Industry Response

We disclosed this vulnerability to the major card schemes and to selected banks and payment switches in early 2012. All parties acknowledged receipt and several contacted us to ask further questions. The card schemes chose initially not to circulate the work, but after several weeks a different contact did decide to circulate our report and our vulnerability disclosure report received several thousand downloads. The vast majority of contacts refused to talk to us on-the-record.

We received some informal responses: the extent and size of the problem was a surprise to some, whereas others reported already being suspicious of the strength of unpredictable numbers or even said others had been explicitly aware of the problem for a number of years. If these assertions are true, it is further evidence that banks systematically suppress information about known vulnerabilities, with the result that fraud victims continue to be denied refunds.

6 Conclusions

EMV is the main protocol used worldwide for card payments, being near universal in Europe, in the process of adoption in Asia, and in its early stages in North America. It has been deployed for ten years and over a billion cards are in issue. Yet it is only now starting to come under proper scrutiny from academics, media and industry alike. Again and again, customers have complained of fraud and been told by the banks that as EMV is secure, they must be mistaken or lying when they dispute card transactions. Again and again, the banks have turned out to be wrong. One vulnerability after another has been discovered and exploited by criminals, and it has mostly been left to independent security researchers to find out what’s happening and publicise it.

In this paper, we report the shocking fact that many ATMs and point-of-sale terminals have seriously defective random number generators. These are often just counters, and in fact the EMV specification encourages this by requiring only that four successive values of a terminal’s “unpredictable number” have to be different for it to pass conformance testing. The result is that a crook with transient access to a payment card (such as the programmer of a terminal
in a Mafia-owned shop) can harvest authentication codes which enable a “clone” of the card to be used later in ATMs and elsewhere.

The “pre-play attack” that we describe is not limited to terminals with defective random number generators. Because of the lack of end-to-end transaction authentication, it is possible to modify a transaction made with a precomputed authentication code, en route from the terminal to the acquiring bank, to edit the “unpredictable number” to the value that was used in the pre-computation. This means that as well as inserting a man-in-the-middle devices between the payment card and the terminal, an attacker could insert one between the terminal and the acquirer. It also means that malware in the terminal can attack the EMV protocol even if the protocol itself is implemented in a tamper-resistant module that the malware cannot penetrate. This may have implications for terminals based on mobile phones that rely on cryptography in the SIM card.

This flaw challenges current thinking about authentication. Existing models of verification don’t easily apply to a complex multi-stakeholder environment; indeed, EMV has already been verified to be secure. We explained why such verifications don’t work and discussed the sort of analysis that is required instead. Ultimately we feel that the tools needed to build robust systems for millions of mutually mistrustful and occasionally hostile parties will involve game-theoretic analysis as well as protocol-theoretic modelling. In addition, mechanisms for rolling out fixes across networks with huge installed bases of cards and terminals, and strong externalities, will have to be much better than those we have at present, with incentives that put the pain where it is deserved and technical mechanisms that offer the prospect of remedial action to the sufferers.

In the meantime, there is a structural governance failure that gives rise to systemic risk. Just as the world’s bank regulators were gullible in the years up to 2008 in accepting the banking industry’s assurances about its credit risk management, so also have regulators been credulous in accepting industry assurances about operational risk management. In a multi-party world where not even the largest card-issuing bank or acquirer or scheme operator has the power to fix a problem unilaterally, we cannot continue to rely on a slow and complex negotiation process between merchants, banks and vendors. It is time for bank regulators to take an interest. It’s welcome that the US Federal Reserve is now paying attention, and time for European regulators to follow suit.

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