Description of document:	Federal Trade Commission (FTC) Business Case Analysis (BCA) for the e-Discovery Support System (eDSS), 2011
Requested date:	22-January-2017
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Source of document:	Freedom of Information Act Request Office of General Counsel Federal Trade Commission 600 Pennsylvania Ave., NW Washington, D.C. 20580 Fax: (202) 326-2477 Email: FOIA@FTC.GOV

FEB 1 6 2017

Re: FOIA-2017-00418
        Business Case Analysis

This is in response to your request dated January 22, 2017, under the Freedom of Information Act seeking access to a copy of the Business Case Analysis (BCA) for the eDSS system at FTC. In accordance with the FOIA and agency policy, we have searched our records as of January 23, 2017, the date we received your request in our FOIA office.

We have located 16 pages of responsive records. I am granting partial access to the accessible records. Portions of these pages fall within one or more of the exemptions to the FOIA's disclosure requirements, as explained below.

Some information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580, within 90 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

You also may seek dispute resolution services from the FTC FOIA Public Liaison Richard Gold via telephone at 202-326-3355 or via e-mail at rgold@ftc.gov; or from the Office of Government Information Services via email at ogis@nara.gov, via fax at 202-741-5769, or via mail at Office of Government Information Services (OGIS), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740.

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Chip Taylor at 202-326-3258.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Federal Trade Commission
Office of the Chief Information Officer

Business Case Analysis for

e-Discovery Support System

<Version 2.1; Last Updated 01 December 2011>

Change History

Version	Name	Date	Rationale
V1.0	G. Brown	10/24/11	Initial Draft
V1.1	P. Connor	10/25/11	Revisions based on J. Huskey feedback
V1.2	P. Connor	10/26/11	Additional information incorporated from G. Brown including current cost information, mapping of current applications to EDRM model.
V1.3	P. Connor	10/27/11	Final Draft. Includes cost estimate for procuring commercial software and for Software as a Service. Eliminates references to particular products.
V1.4	P. Connor	11/1/11	Comments from C. Falcone; updated cost information from J. Johnson.
V1.5	P. Connor	11/2/11	Meeting with G. Brown and C. Falcone.
V1.6	P. Connor	11/7/11	Comments from Governance Board meeting of 7 November 2011
V1.7	C. Falcone	11/7/11	Comments from H. Frost, J. Steiger, and M. Mech; updated Executive Summary and corresponding parts throughout BCA.
V2.0	G. Brown	11/30/11	Comments from Eileen; updates throughout BCA.
V2.1	G. Brown	12/1/11	Comments from M. Mech; Modifications to System Administration expenses for Software Procurement model.

Table of Contents

Executive Summary

The Federal Trade Commission (FTC) needs to replace its litigation support system. Concordance, the FTC's current system, is at the end of its lifecycle. With significantly increased amounts of data being produced by outside parties in litigation matters, the agency can no longer timely process documents produced in discovery with its inefficient and outdated technology. Simply put, maintaining the status quo in not a viable option for the FTC.

This Business Case analyzes several viable strategies for acquiring a replacement system. We are requesting the IT Technical Council and the Governance Board to approve this Business Case to allow the Office of the Chief Information Officer (OCIO) to send out a request for proposal (RFP) to vendors.

Currently, there are several commercial solutions that appear to meet the full end-to-end e-Discovery process within a single software family and allow for either modular or full implementation. This will imply eliminating the need to support and maintain BCP and BC's offline environments. OCIO and a litigation support team comprised of representatives from the Bureaus and Offices will closely analyze all vendors and products during the RFP process and determine the best product or service and deployment strategy.

OCIO developed a rough order of magnitude (ROM) for a solution with a first year cost of between $1.3M and $1.5M and a 5-year cost ranging from $4.4M to $5M. The typical lifecycle for such software is 5 years. The shown ranges are based on using either a regular software procurement or utilizing a cloud-based Software as a Service (SaaS)* model. As a point of reference, the FTC currently spends approximately $1.2M per year in operational costs for Concordance and other enterprise Litigation Support Systems.

OCIO recommends FTC's RFP include at least the processing, review, analysis and production portions of the electronic discovery reference model (EDRM) described hereafter. Products or services may also address other aspects of e-discovery. In any case, all proposals should also enable a modular or agile procurement of components. This will provide the FTC with the greater flexibility and mitigate the risk if the full amount to fund an end-to-end solution is not available. In addition, the RFP will also request bids for a cloud-based SaaS solution.

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* Unlike traditional software, conventionally sold as a perpetual license with an associated up-front fee, SaaS providers generally price applications using a subscription fee, most commonly a monthly fee. Consequently, the initial setup cost is typically lower than the equivalent enterprise software costs. SaaS vendors typically price their applications based on some usage parameters, such as the number of users ("seats"). (Source: Wikipedia)

General Project Information

Business Need

The FTC has identified a need to review the FTC "as-is" e-Discovery toolset and provide alternatives to more effectively identify, collect, preserve, process, review, analyze, and produce the necessary documents and information to meet the regulatory requirements established for this process. The industry standard reference model for the e-Discovery process, the EDRM, is shown in Figure 1. The FTC does employ electronic records management functionality, which is being examined separately in another business case for the Son of Doc-Smart. Accordingly, it is not part of this business case analysis.
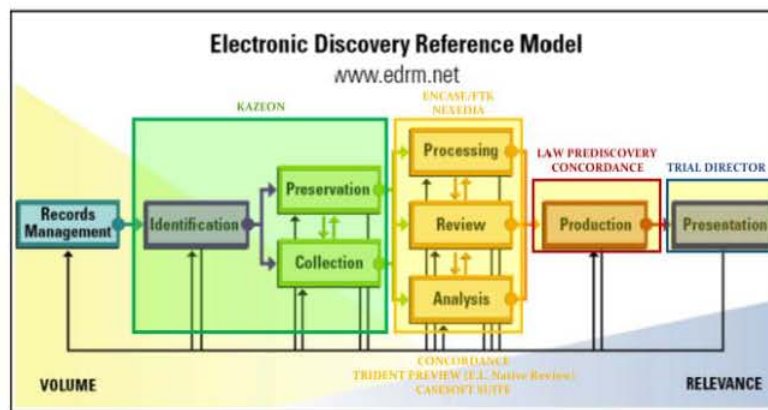
Figure 1. Electronic Discovery Reference Model with FTC Applications Overlaid

Current State

The FTC's current litigation e-Discovery process utilizes a collection of discrete litigation support applications with the LexisNexis Concordance software tool as the enterprise document review platform. Over the last few years, the FTC has seen a significant increase in the amount and types of data that is collected and reviewed and has been unable to meet the FTC's litigation needs to effectively and efficiently review and process the data collected with the current software applications. The FTC has also faced challenges related to remote-office generation and use of data. This is especially evident within the FTC's eight regional offices where users experience unacceptable system latency problems causing the current system to be ineffectual. The various software products are listed below and in Figure 1.

The current set of software applications include:
- Encase: forensic collection and analysis
- Forensic Toolkit (FTK): forensic collection and analysis
- Kazeon: forensic collection, indexing and analysis
- LexisNexis LAW Pre-Discovery: processing and production
- LexisNexis CaseSoft Suite: collaborative activities; transcript management
- Trident Preview: native document file-viewing, review

- Equivio: analytical solutions, review
- Nexidia: index and search audio files, processing and analysis
- Trial Director: trial presentation of case materials

Goals

The goals of the project are to:
1. Increase the efficiency and thoroughness of all phases of the EDRM processes and enable the FTC to meet litigation needs.
2. Leverage new technologies that cluster data, apply intelligent, algorithmic analysis and provide improved abilities that adhere to the new Federal Rules of Civil Procedure (FRCP) and enable FTC to compete with private-practice litigators.
3. Provide the ability to quickly move, process, and access large amounts of content between and among offices throughout the United States, including remote offices in Headquarters and the Regions.
4. Provide the capability to provide adequate 'surge' capability for large amounts of data in short periods of time, in both Headquarters and Regional Offices.
5. Achieve cost savings through the use of innovative technology.

Scope

Eventually the agency will address all phases of the EDRM model shown below; however, due to the complex nature and scope of this effort, the project will initially focus on a subset of functionality that is currently performed by the LexisNexis Concordance software – processing, reviewing, analysis, and production (oftentimes referred to as the "right side" of the EDRM model) as shown in Figure 2.

Figure 2. Electronic Discovery Reference Model Focus Areas
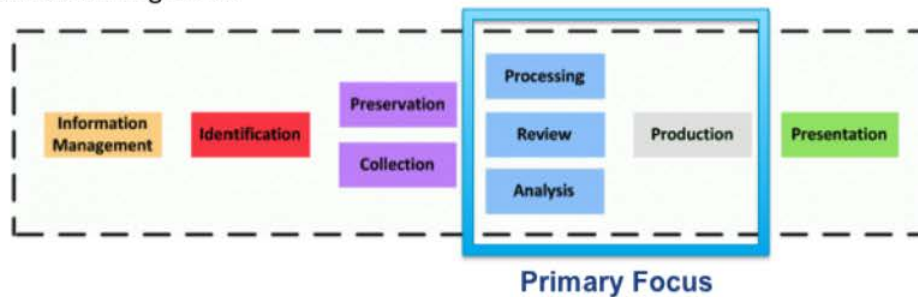
The project analysis will also address all of the following items; although some of them may be performed with existing resources, personnel, or contractor support:

- Software and Hardware (application, database, and operating system)
- Content Storage Solution
- Design, Development, and Installation of Solution
- Training and End User Support
- Operational and User Testing

- System Administration (application and database)
- Data Migration (as necessary)
- Business Process Re-Engineering (as necessary)
- System Integration (as necessary)
- Processing
- Project Management

The project analysis DID NOT address costs associated with using the current system meaning, staff cost and hours for bureau-specific work on current Litigation Support.

In addition, the project analysis DID NOT address costs savings/increases due to productivity changes that may be associated with the new system because there is a possibility that the selected solution may not cover all phases of the EDRM i.e. the situation may occur where current software licensing and support will not be replaced by the selected solution.

Risks/Mitigations

As the scope of the entire end-to-end process of e-Discovery is quite significant, there are several major risks associated with the project. For each of the major risks identified, there is a corresponding proposed mitigation strategy. Additional risks and mitigations will be included within the Project Plan.

- **Budget and Resourcing**. There may not be adequate funding to complete the entire end-to-end process within a single RFP/work effort. To mitigate this risk the project will focus on specific parts of the end-to-end e-Discovery process and plan on properly integrating the various parts/modules over the project lifecycle. An alternative strategy would be to obtain SaaS to minimize upfront capital expenditures for software and hardware and allow for the entire or at least a greater percentage of the process to be funded at one time.

- **Functional Requirements**. The diversity of Bureau and Office-specific mission requirements and the current state of the e-Discovery software market suggest there may not be a singular, holistic solution that will meet all of the functional requirements. Accordingly, the project should be careful to apply evaluation criteria that are reflective of the phases of EDRM for which the majority of FTC litigation efforts are focused and for which the opportunity for the greatest gains in efficiency and effectiveness present themselves. The RFP will mention acceptance of only a single COTS solution for whichever phases are being covered by a particular product. If there is a single holistic solution then FTC will be able to eliminate the need to support and maintain BC and BCP's offline environments.

- **Technical Skills**. The proposed solutions may require technical support resources that are not currently in-house or under contract. The cost estimate and project planning will need to address additional technical support to properly train in-house staff or to obtain

these services. Accordingly, the RFP will have mandatory CLINs for training and 1 year of administration support. After the first year, transition to FTEs or contract support will be provided under a new infrastructure support contract with bounds on the number of database instances.

- **Process Changes**. The proposed project solution will require the acceptance of a temporary decrease in efficiency as the customer base is trained to efficiently use the new product and potential changes to the litigation policies and procedures to efficiently incorporate the new software functionality. Resources for change management and business process re-engineering will be included to address these items.

- **System Cutover**. The proposed project solution will most likely require the need to operate both the "new" and "old" systems in parallel until the necessary cases within the old system are completed and the new system is certified for operation.

The duration of the cutover will be determined as part of the overall project planning but is estimated to be greater than 6 months. Post award, approximately 3 months will be required to manage the implementation of the new system (in-house). It will include installing the new system in development environment, taking it through the entire Acceptance Testing process and installing in production. Implementation of a hosted solution would be less onerous. The issue of data migration will have to be addressed regardless of the solution.

Criteria for switching existing data to a new system may be driven by bureau preferences/resources that could include

- Case size

- Composition of underlying dataset (native vs. paper)

- Status of the matter

- End-user training requirements to use the new system

Past experience suggests that conversion to an exclusive new system will take a calendar year to execute. Resources will be included to address these items and ensure a cutover with minimal negative impact to ongoing case management.

- **System Security Plan**. Required.

- **Privacy Impact Assessment**. Requires updating.

Alternatives

Assumptions/Constraints

The assumptions used for the analysis of alternatives are as follows:

- The current system is at end of lifecycle and is unable to meet the current required processing timeframes. Accordingly, the option of "do nothing" is not a viable alternative. Nonetheless, yearly costs to support the current system are set forth as a point of

reference.

- Lifecycle cost data for the current set of systems and processes are not fully understood or available and as such a comprehensive ROI cannot be developed. ROI doesn't include bureau-specific staff hours for actual support of the litigation support systems.

- Project deployment may be modularized, and as such, the lifecycle cost of the entire EDRM system will be a ROM until additional information is collected or a decision is made to fund all or certain modules of the EDRM solution.

- To the solution will utilize COTS software components or leverage cloud-based solutions such as SaaS.

Requirements

The requirements primarily follow the standard functions within the EDRM model and are shown at the end of this document under "Functional Requirements." Any changes or additional detailed functional requirements will be identified within the RFP.

Evaluation Criteria

The evaluation criteria are identified within the Draft RFP. As part of the review process, weights will be provided to the evaluation criteria to ensure the most effective and efficient solution is procured for the FTC. One example of the evaluation criteria could be a required service level for upload and download times for a specific sized document being accessed from one of the FTC's eight regional offices.

Candidates

OCIO initiated the analysis of an EDRM compliant software solution with a RFI conducted in early 2011. The RFI was supplemented by functional demonstrations, industry research, and industry analysis. Based on the review, the following was determined with respect to candidate solutions:

- There are several viable COTS products.
- Deployment can either be "traditional" (i.e. procure licenses and hardware and host within the FTC environment) or through a cloud-based SaaS model.

Cost Estimates

As a point of reference, the following estimated costs are identified for the "Current" system. The costs include some known costs (e.g. software maintenance), estimates for items that are shared services (e.g. project management), and some unknowns if the costs have never been segregated out to a specific system (e.g. Training and End User Support). As stated earlier, the costs do not contain bureau-specific staff hours for support of the litigation support systems. Year 1 costs are those for the first proposed twelve months of the project and allow the project to start at any time during a specific calendar year.

Cost Area	Current FTC Solution					
	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	5 Year Total
Software	$ -	$ -	$ -	$ -	$ -	$ -
Software Maintenance	$344,102	$354,425	$365,058	$376,010	$387,290	$1,826,885
Hardware	$154,800	$159,444	$164,227	$169,154	$174,229	$821,854
Operating System	$17,000	$17,510	$18,035	$18,576	$19,134	$90,255
Storage (OCIO Production + BCP LSS)	$407,000	$419,210	$431,786	$444,740	$458,082	$2,160,818
Design, Develop, Install	$ -	$ -	$ -	$ -	$ -	$ -
Training and End-User Support	UNK	UNK	UNK	UNK	UNK	$ -
Information Assurance	$ -	$ -	$ -	$ -	$ -	$ -
System Administration	$250,000	$250,000	$250,000	$250,000	$250,000	$1,250,000
Data Migration	$ -	$ -	$ -	$ -	$ -	$ -
Business Process Re-Engineering	$ -	$ -	$ -	$ -	$ -	$ -
System Integration (as necessary)	$ -	$ -	$ -	$ -	$ -	$ -
Program Management	$2,500	$2,500	$2,500	$2,500	$2,500	$12,500
Total	$1,175,402	$1,203,089	$1,231,606	$1,260,980	$1,291,235	$6,162,312

The breakdown of the current OCIO annual software maintenance expenses for enterprise support is below:

Application	Maintenance Cost*
Concordance	$33,000
EnCase	$13,652
Forensic Toolkit	$42,450
Kazeon	$19,000
LAW PreDiscovery(OCIO)	$15,000
LAW PreDiscovery(BCP)	$33,000
LAW PreDiscovery(BC)	$18,000
Casesoft Suite	$35,000
Trident Preview	$12,000
Equivio	$115,000
Nexedia	$0**
Trial Director	$5,800
Total	$341,902

* Inflation was 3%.

** There is no maintenance cost since currently the application is not being updated.

The following costs are identified for a solution procured as a cloud-based SaaS. A number of the costs are included within the SW price. The costs do not contain costs or potential cost savings associated with FTC usage of the system. In addition, the cost estimates are made based on being able to process, analyze, and review up to 1TB of data (at a time) and no limit on the amount of data that can be pre-processed. Depending on the anticipated volume, this solution cost may be much higher. As a point of reference, the Bureau of Competition has, on average, 15TB of data to process, analyze, and review each year. The amount of data that can be culled and therefore not reviewed by staff remains difficult to estimate and as such the amount for "Processing" is a rough order estimate.

Cost Area	Software as a Service					
	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	5 Year Total
Software	$480,000	$494,400	$509,232	$524,509	$540,244	$2,548,385
Software Maintenance	Included	Included	Included	Included	Included	$ -
Hardware	Included	Included	Included	Included	Included	$ -
Operating System	Included	Included	Included	Included	Included	$ -
Storage (OCIO Production + BCP LSS)	$407,000	$419,210	$ -	$ -	$ -	$826,210
Storage (vendor)	Included	Included	Included	Included	Included	$ -
Design, Develop, Install	Included	Included	Included	Included	Included	$ -
Training and End-User Support	Included	Included	Included	Included	Included	$ -
Information Assurance	Included	Included	Included	Included	Included	$ -
System Administration	Included	Included	Included	Included	Included	$ -
Data Migration	$50,000	$ -	$ -	$ -	$ -	$50,000
Business Process Re-Engineering	Included	Included	Included	Included	Included	$ -
System Integration (as necessary)	$ -	$50,000	$ -	$50,000	$ -	$100,000
Processing Costs (1 TB)	Included	Included	Included	Included	Included	$ -
Project Management	$250,000	$125,000	$ -	$ -	$ -	$375,000
System Cutover	$ -	$71,400	$ -	$ -	$ -	$71,400
Program Management	$150,000	$75,000	$75,000	$75,000	$75,000	$450,000
Total	$1,337,000	$1,235,010	$584,232	$649,509	$615,244	$4,420,995

Annual storage expenses associated with years 3-5 will be incurred for BCP and OCIO regardless of the selection of either in-house or SaaS models as a solution. The storage may be reallocated for use by other applications or processes and not directly related to the support of the EDSS. Funding will be assumed by the ongoing BCA for storage.

The following costs are identified for a software solution being procured and installed. As it is regular software procurement, some of the costs are included within the license model and others are borne by the FTC. The costs do not contain costs or potential cost savings associated with FTC usage of the system. In addition, the costs estimates are made based on being able to process, analyze, and review up to 1TB of data (at a time) and no limit on the amount of data that can be pre-processed. Depending on the anticipated volume, this solution cost may be much higher. As a point of reference, the Bureau of Competition has, on average, 15TB of data to process, analyze, and review each year. The amount of data that can be culled and therefore not reviewed by staff remains difficult to estimate and as such the amount for "Processing" is a rough order estimate.

Cost Area	Software Procurement					
	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	5 Year Total
Software	$375,000	$ -	$ -	$ -	$ -	$375,000
Software Maintenance	Included	$30,000	$30,900	$31,827	$32,782	$125,509
Hardware	Included	Included	Included	$50,000	Included	$50,000
Operating System	Included	Included	Included	Included	Included	$ -
Storage (OCIO Production + BCP LSS)	$407,000	$419,210	$99,725	$102,717	$105,798	$1,134,450
Storage	Included	Included	Included	Included	Included	$ -
Design, Develop, Install	Included	$25,000	$25,750	$26,523	$27,318	$104,591
Training and End-User Support	Included	$125,000	$128,750	$132,613	$136,591	$522,954
Information Assurance	Included	Included	Included	Included	Included	$ -
System Administration	Included	$175,000	$180,250	$185,658	$191,227	$732,135
Data Migration	$50,000	$ -	$ -	$ -	$ -	$50,000
Business Process Re-Engineering	Included	$125,000	$128,750	$132,613	$136,591	$522,954
System Integration (as necessary)	$ -	$50,000	$ -	$50,000	$ -	$100,000
Processing Costs (1 TB)	$250,000	$60,000	$61,800	$63,654	$65,564	$501,018
Project Management	$250,000	$62,500	$ -	$ -	$ -	$312,500
System Cutover	$ -	$71,400	$ -	$ -	$ -	$71,400
Program Management	$150,000	$100,000	$100,000	$100,000	$100,000	$550,000
Total	$1,482,000	$1,243,110	$755,925	$875,605	$795,871	$5,152,511

Annual storage expenses associated with years 3-5 will be incurred for BCP and OCIO regardless of the selection of either in-house or SaaS models as a solution. The storage may be reallocated for use by other applications or processes and not directly related to the support of the EDSS. Funding for storage associated with an SQL or Oracle database backend will be assumed by the ongoing BCA for storage.

Justification and Investment

Comparison Summary

As all of the cost data for the current system is unknown, it is unrealistic to complete a ROI calculation; however, a cash flow can be summarized for the current system and the alternatives of SaaS and software procurement.

Options	Year 1	Year 2	Year 3	Year 4	Year 5	5 Year Cost
Current	$1,175,402	$1,203,089	$1,231,606	$1,260,980	$1,291,235	$6,162,312
Software as a Service	$1,337,000	$1,235,010	$584,232	$649,509	$615,244	$4,420,995
Procurement	$1,482,000	$1,243,110	$755,925	$875,605	$795,871	$5,152,511

This summary table identifies that the use of SaaS may be a viable alternative based on a 5-year total cost estimate. However, since a number of the components for the costs are estimates or unknown, the table should be used for reference purposes only and not as the sole component for decision making.

Preferred Option

The preferred software solution (i.e. "which product") and deployment method (SaaS or regular procurement) cannot be conclusively derived from the current information. The information received from the RFP process will include the necessary cost, technical capabilities, risk, and schedule factors that can be used to select the best overall solution for the FTC.

Acquisition Strategy

The proposed acquisition strategy is to develop and submit a RFP that will encompass at least the processing, review, analysis, and production aspects of the EDRM model, with the understanding that the full end to end EDRM solution may not be within the current budget. Responses received from the RFP will provide the basis for negotiation and procurement of one or more modules of the EDRM. The RFP should be structured to enable a modular procurement of the components as well as the option for SaaS.

The OCIO will partner with the respective litigation support staff and litigation stakeholders to select and implement the preferred solution into the FTC environment as quickly as possible. The implementation of the solution will also include a roadmap for the remaining modules (if necessary) as well as the roadmap for conversion, transfer, and/or decommissioning of current appropriate litigation support technologies.

Implementation Plan

An implementation, or Project Plan, will be developed in parallel with the RFP process. The project plan will address, among other things, the cutover schedule, the deployment process (e.g. department by department, etc.), training concepts, etc.

Performance Measures

Performance measures will be developed in parallel with the RFP process and focus on the modules that are to be replaced to provide a before and after snapshot of how well the deployed system is able to meet the identified requirements. A focus will be on meeting the FTC's litigation needs for processing time.

Functional Requirements

Processing	Preservation and Collection
Deduplication	Litigation hold notification, reminders, tracking
DeNIST capabilities	Custodial survey and auditing
Password protected file detection	Index/import from network file locations/Exmerge
Decryption	Electronic mail collection
Filter/restrict (domain, file type, etc.)	Microsoft Exchange (2000, '03, '07, later)
Exception/gap reporting	Lotus Notes (5-8 and later)
	Novell GroupWise (6.5, 7 , 8, and later)
Review and Analysis	Outlook Express / Bloomberg Mail
Email/Electronic Documents	Collection/media history
Discussion threading	Scheduling of periodic collections
Domain filters	Systematic sampling/reporting
People Analytics	Enterprise search and collection
Near duplicate detection/comparison	On Line
Find Similar	Off Line
Data Analytics	Portable media
Content clustering, categorization or classification	Backup, peripheral, and optical media
Visualization/graphics	File System Support
Searching	EXT2, 3
Boolean	HFS, HSF+File systems/ FAT 12,16,32
Concept	NFTS File Systems / Virtual PC. Ghost, VMware File Formats
Subset Search	Palm OS, Reiser, UDF, FFS, JFS File Systems
Hit Highlighting	Novell NWFS and NNS File Systems
Meta/Field Filtering	Legacy File Systems Supported
Document Review	
Batch Assignment/Review Management	**Integration**
Family Propagation Rules	Transcript management/search
TIF/PDF Rendering	Audio/video support – review, index, search
Native File Viewer	Tape and Archival Service
Concurrent Processing	
Redaction/Annotations	**Additional Features**
Production	Predictive analytics/coding
Export files in native or image format	Password cracking
Create major load files (XML, DAT, CSV, TXR, ASCII, etc.)	Reconstitution of PSTs
Ability to produce in stages (rolling productions)	Automated redactions (PII/SHI)
OCR/extracted text	Tiered sorting for production
File naming options (rename for DocID or Bates number)	
Endorsing image or PDF files	
Multiple production set/image handling	

Approval

The undersigned have reviewed the Business Case Analysis for the E-Discovery Support System and certify that it is compatible with the Federal Trade Commission's Enterprise Architecture, information security requirements, and IT Strategy.

(b)(6)

Jeffrey Huskey, Chief Information Officer   11/15/11
                                                            Date

(b)(6)

Jacalyn Johnson, Assistant Director for Infrastructure   11/15/11
                                                            Date

(b)(6)

Margaret Mech, Assistant Director for Information Assurance 11/15/11
                                                            Date

(b)(6)

Juanhui Xie, Technical Director   11/15/11
                                                            Date