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Description of document: **Correspondence between the Securities and Exchange Commission (SEC) and the National Archives and Records Administration (NARA) Office of Record Services, January 1, 2001 - 2007**

Requested date: 22-March-2007

Released date: 30-May-2008

Posted date: 20-June-2008

Date/date range of document: 18-September-2001 – 09-April-2007

Source of document: FOIA Officer  
National Archives and Records Administration  
NGC-Room 3110  
8601 Adelphi Road  
College Park, MD 20740  
Phone: (301) 837-3642  
FAX: (301) 837-0293

Note: Fourteen pages withheld in full.

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# *National Archives and Records Administration*

8601 Adelphi Road  
College Park, Maryland 20740-6001

May 30, 2008

Re: Freedom of Information Act Request NGC07-105

This is in response to your Freedom of Information Act (FOIA) request of March 22, 2007, for correspondence between the Securities and Exchange Commission (SEC) and the National Archives and Records Administration (NARA) from January 1, 2001 to the present. Your request was received in this office on April 9, 2007, and assigned tracking number NGC07-105. On April 6, 2007, you narrowed your request to include only records from the Office of Record Services. I apologize for the delay in our response.

We located a total of 100 pages responsive to your request. Fourteen pages are being withheld in full pursuant to 5 U.S.C. 552(b)(5), the deliberative process privilege. One page is being released in part and being withheld in part, pursuant to 5 U.S.C. 552(b)(5), the deliberative process privilege and is enclosed with redactions. Two pages are being released in part and being withheld in part, pursuant to 5 U.S.C. 552(b)(6), the personal privacy privilege and are enclosed with redactions. The remaining 83 pages are being released in full and are enclosed.

You agreed to pay up to \$100.00 for costs associated with this request. Per OMB guidelines, we are allowed to charge \$0.20 for reproductions. To cover the fees associated with the 86 pages of reproductions enclosed, please send a check made out to NARA for \$17.20 to my attention in Room 3110 at the above address.

If you are not satisfied with our action on this request, you have the right to file an administrative appeal. Address your appeal to the Deputy Archivist (ND), National Archives and Records Administration, College Park, Maryland 20740. Your appeal should be received within 35 calendar days of the date of this letter and it should explain why you think this response does not meet the requirements of the FOIA. Both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." All correspondence should reference the tracking number NGC07-105.

Please let us know if we may be of further assistance.

Sincerely,

JAY OLIN  
Deputy FOIA Officer

Office of General Counsel

Enclosures

August 27, 2004

Mr. Larry Mills  
Securities and Exchange Commission  
6432 General Green Way  
Mail Stop 0-24  
Alexandria VA 22312

Dear Mr. Mills:

This is a follow-up to the July 7, 2004, letter of the Archivist of the United to the head of your agency concerning collections of materials prepared for use by the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission").

Enclosed with the letter was an SF 115, Request for Records Disposition Authority, designating the copies of materials loaned, made available, or briefed to the Commission as permanent. We requested return of the signed SF 115 within 30 days. We have yet to hear from your agency and would appreciate it if you would look into the status of the schedule at your agency and report back to us by September 10, 2004.

Thank you for your cooperation. Please contact David Langbart via e-mail at <[david.langbart@nara.gov](mailto:david.langbart@nara.gov)> or by telephone on 301-1837-3172 with your report or if you have any questions.

Sincerely,

PAUL M. WESTER, JR.  
Director  
Life Cycle Management Division

Official File-NWML  
Reading File-NWML

cc: Langbart  
Proctor

doc:s:\correspondence\911.commission.tickle.SEC.letter

file:1301-1a: SECURITIES AND EXCHANGE COMMISSION

Drafted by: Langbart

DL

3/24/04

DL/dl/8/24/04



OFFICE OF FILINGS AND  
INFORMATION SERVICES

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
OPERATIONS CENTER  
6432 GENERAL GREEN WAY  
ALEXANDRIA, VIRGINIA 22312-2413

*MIN*  
07.30.2004  
David - 8/2  
File -

July 23, 2004

National Archives & Records Administration  
Attn: John W. Carlin, Archivist of the United States  
8601 Adelphi Road  
College Park, Maryland 20740-6001

Dear Mr. Carlin:

The Securities and Exchange Commission's (SEC) Division of Enforcement and Office of International Affairs are reviewing materials the SEC loaned or made available to the 9/11 Commission. The review is addressing issues related to limitations on use from foreign regulators, pending FOIA request appeals, as well on-going enforcement interests. Until these issues have been resolved the materials requested cannot be forwarded to the National Archives and Records Administration. We will provide a transfer date (SF115) within your guidelines.

If you have questions regarding this matter, please contact Celia Jacoby of our Office of General Counsel at (202) 942-0900.

Sincerely,

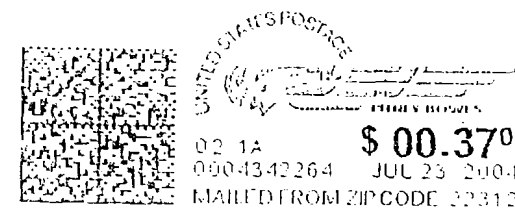
Kenneth A. Fogash, Associate Executive Director  
Office of Filings and Information Services

ORIGINAL : N

CC: NGC, NW, NWML (Westerv)  
NWL (HUNT), ND

U.S. Securities and Exchange Commission  
Operations Center  
6432 General Green Way  
Alexandria, Va. 22312

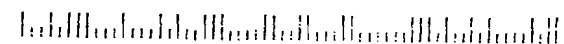
OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE, \$300  
RETURN AFTER FIVE DAYS



National Archives & Records Administration  
Attn: John W. Carlin, Archivist of the U.S.  
8601 Adelphi Road  
College Park, Maryland 20740-6001

JUL 28 2004

20740+6001 30



JUL 7 2004

The Honorable William H. Donaldson  
Chairman  
Securities and Exchange Commission  
Washington, DC 20549

Dear Chairman Donaldson:

September 11, 2001, is a pivotal moment in our history. The terrorist attacks on the United States have had far-reaching effects on our country and the world, and, therefore, the United States Government must preserve the fullest possible documentation on those events. To that end, the National Archives and Records Administration is working with the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission") to ensure the proper disposition of its records.

The Commission informs us that your agency, in addition to providing it with copies of documents, also loaned to the Commission or made available to its staff in your agency's offices certain documents that the Commission was not permitted to retain. Those materials tell an important part of the story of September 11 and the Commission's work. As you can see from the enclosed letter, the Commission has urged us to ensure that those materials are preserved along with those of the Commission.

We have determined that the collections of documents loaned to the Commission or made available or briefed to Commission staff in your agency's offices must be preserved as ancillary files to the records of the Commission itself. For your convenience, we have prepared the enclosed SF 115, Request for Records Disposition Authority, to cover those records. Please have your records officer or other designated official complete block 6, sign, date, and return the form to us within 30 days of the date of this letter.

The proposed schedule calls for the transfer of the records when the records of the Commission itself are transferred to the National Archives. That transfer will take place within two months of the Commission issuing its final report. It is standard practice for temporary commissions to transfer their records to the National Archives upon termination. Since the materials held by your agency are so closely



related to the records of the Commission, we believe that it is appropriate that they be transferred at the same time. This will also remove the burden of storing those materials from your agency. If, however, transfer that soon is not possible, please submit a revised SF 115 that provides a transfer date consistent with 44 USC 2107(2), which mandates the transfer of permanent records to NARA when no more than 30 years old, unless the records are needed for day-to-day agency business.

We appreciate your cooperation in dealing with these significant files. Please contact Paul M. Wester, Jr., Director of the Life Cycle Management Division, on 301-837-3120 if you have any questions. David Langbart is handling our liaison with the Commission. He can be reached on 301-837-3172.

Sincerely,

JOHN W. CARLIN  
Archivist of the United States

Enclosures

cc: Larry Mills, SEC Records Officer  
Richard Humes, Commission Contact

Official File-NWML  
Reading File-NWML  
-N

cc: Langbart  
Proctor  
Larry Mills, SEC  
Richard Humes, SEC

doc: s:\correspondence\911.commission.SEC.letter

file: 1301-1a SECURITIES AND EXCHANGE COMMISSION

Drafted by: Langbart

DL/dl/6/30/04

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Brett Abrams" <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** Fri, Sep 10, 2004 3:15 PM  
**Subject:** RE: Progress on sending NARA a copy of EDGAR

Brett,

Sorry for the delay. Between the business travel and leave, I am trying to work it in. I should be able to meet the appropriate personnel in our IT staff on the upcoming Wednesday or Thursday. I will be able to coordinate with you after the meeting.

L. Mills

-----Original Message-----

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Thursday, September 02, 2004 7:23 AM  
To: MillsL@SEC.GOV  
Subject: RE: Progress on sending NARA a copy of EDGAR

Hi Larry:

Wondering how things are going with the update on transferring data from EDGAR.

Best,

Brett

>>> "Mills, Larry" <MillsL@SEC.GOV> 08/19/04 06:25PM >>>  
Brett,

I am off tomorrow. I will contact you Monday with an update.

L. Mills

-----Original Message-----

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Monday, August 16, 2004 2:48 PM  
To: MillsL@SEC.GOV  
Subject: Progress on sending NARA a copy of EDGAR

Hi LArny:

Hope all is well. Wondering how things are going regarding sending the electronic records division a copy of the data in EDGAR. When we last discussed this, we thought July might be possible. I understand that everyone has much to do. Therefore, as long as we can see a date when the data and documentation can be sent, that's great as far as we are concerned.

Let me know how things are coming along.

Brett



8601 Adelphi Road  
College Park, Maryland 20740-6001

OCT 11

Mr. Larry Mills  
Records Officer  
Securities and Exchange Commission  
Mail Stop A-3  
6441 General Green Way  
Alexandria VA 22312

Dear Mr. Mills:

The National Archives and Records Administration (NARA) has completed its review of the permanent records of the Securities and Exchange Commission stored at the Washington National Records Center (WNRC) and eligible for transfer to NARA in 2002. As a result of this review, we have prepared the enclosed SF 258, "Agreement to Transfer Records to the National Archives of the United States" covering 95 cubic feet of eligible permanent records.

Please review the SF 258 for accuracy, sign it in Block 2A and return it to:  
Richard Wood  
Initial Processing and Declassification Division (NWMD) Room 2600 National Archives at College Park  
8601 Adelphi Road  
College Park MD 20740-6001

If you have any further questions about these textual records accessions please contact Mr. Wood on 301-713-7159

Sincerely,

JÉANNE SCHAUBLE  
Director  
Initial Processing and Declassification Division



M

1/30/02 15:35 09

**facsimile**  
TRANSMITTAL

to: LARRY MULLS

fax #: 703-914-4381

re: RG 26C

date: 1/30/02

pages: 4, including this cover sheet.

Attached is a copy of a Standard Form 258 and accompanying transmittal for records of your agency that are eligible for transfer to the National Archives in 2002. We are sending it via FAX in response to your request to Ms. Pamela Wright or Mr. Robert Reed of our staff. If you have any questions, please contact me at 301-713-7159 or by e mail at Richard.Wood@nara.gov

Sincerely

RICHARD E. WOOD  
Supervisory Archivist  
Initial Processing and Declassification Division



# *National Archives and Records Administration*

8601 Adelphi Road  
College Park, Maryland 20740-6001

September 18, 2001

Mr. Larry Mills  
Securities and Exchange Commission  
Mail Stop A-3  
6441 D General Green Way  
Alexandria, VA 22312

Dear Mr. Mills:

Enclosed is a signed copy of a Standard Form 258 (our number NN3-266-01-001) for records of your agency recently transferred to the custody of the National Archives and Records Administration. The signature on line 16 confirms that the records have been accepted into the National Archives of the United States. If any portion of the records covered by the SF 258 was missing at the time of transfer, the form has been annotated to indicate what we did not receive.

If the enclosed SF 258 covered any records charged out to your agency from the Washington National Records Center, we ask that those records be returned to the National Archives at College Park (3301 Metzerott Road). Please do not return them to the Washington National Records Center.

If you have any questions about this transfer, please let me know (telephone 301-713-7160, x228, or e-mail [Ron.Swerczek@nara.gov](mailto:Ron.Swerczek@nara.gov)).

Sincerely,

RONALD E. SWERCZEK  
Initial Processing/Declassification Division

Enclosure

File 1304

Securities and Exchange  
Commission

From: Alan Kramer  
To: Larry Mills  
Date: 12/14/2006 3:38:56 PM  
Subject: Re: FW: STORAGE OF ELECTRONIC RECORDS AT THE RECORDS CENTERS

AMC

12/14

Mr. Mills:

The Electronic Records Unit which is currently being constructed at the Washington National Records Center is approximately 50% complete with construction estimated to take about another month for completion. We will opening the electronic records storage unit for environmentally controlled storage and possible servicing of electronic records of all types. Storage will be under the environmental conditions which are considered to be best for preservation of electronic media. We could use the WNRC METRO courier service to pick up and deliver electronic records which you might want to cycle into and out of the electronic storage unit here at the WNRC.

If you are able to compile a listing, I would appreciate a breakout of the types of electronic data you would be transferring and the volume of each.

Matthew Eidson; who is the Director of the Records Center Operations Division, Judy Barnes who is the Deputy Division Director, and I would be happy to meet with in early January, at your convenience, to give you a tour or to answer any additional questions you may have about storage or other services. We will also have shredding machine which will be available to effect proper and complete disposal of electronic records should they become eligible for disposal.

To fully answer your question, the Southwest Regional Records facility in Fort Worth, Texas, will be opening an electronic storage unit at approximately the same time as we are. At the current time, the Federal Records Center system not have an electronic records storage available for immediate storage but ours will soon be ready.

Please call or write if you want to set up a time for a visit.

>>> "Mills, Larry" <MillsL@SEC.GOV> 12/14/2006 2:34 PM >>>

Alan,

Because, we are starting to receive electronic media, such as disk drives and CDs with investigate records, I am re-checking to find out if the WNRC can store electronic records. I read your current on-line booklet "Federal Records Centers of the National Archives and Records Administration". The section regarding Electronic Records states "select FRCs currently provide the following electronic services...Electronic media services, including storage and servicing of e-records in climate-controlled areas". If the WNRC is still unable to store electronic records, can you tell me which FRCs can?

Thanks,  
Larry Mills, SEC Records Officer

-----Original Message-----

From: Christina Bartlett [<mailto:Christina.Bartlett@nara.gov>]

Sent: Thursday, May 25, 2006 4:47 PM

To: Curtis Francisco; Mills, Larry

Subject: RE: STORAGE OF ELECTRONIC RECORDS AT THE RECORDS CENTERS

Larry,

Curt has left for the day, so I will let you know that WNRC does not store electronic records.

Chris

>>> "Mills, Larry" <[MillsL@SEC.GOV](mailto:MillsL@SEC.GOV)> 5/25/2006 2:03:53 PM >>>  
Curtis,

I think you need to double-check this. The information you sent me pertains to permanent records that are being "transferred" to the custody of NARA. My question pertains to temporary records that would be "stored" at one of your records center; such as at the Washington National Records Center.

Thanks,  
L. Mills

-----Original Message-----

From: Curtis Francisco [<mailto:Curtis.Francisco@nara.gov>]

Sent: Thursday, May 25, 2006 12:18 PM

To: Mills, Larry

Subject: Re: STORAGE OF ELECTRONIC RECORDS AT THE RECORDS CENTERS

Whoops! I forgot to attach the link. Let's try that again:

<http://www.archives.gov/records-mgmt/initiatives/transfer-records-to-nara.html>

>>> "Mills, Larry" <[MillsL@SEC.GOV](mailto:MillsL@SEC.GOV)> 05/25/06 09:26AM >>>  
Curtis,

I need a quick answer to whether temporary electronic records can be stored at the NARA records centers. Specifically, we are starting to receive CDs and DVDs with our investigative files.

Will the WNRC be able to store the CDs and DVDs?

Thanks,  
Larry Mills, Records Officer  
Securities and Exchange Commission

CC: David Weinberg; Judith Barnes; Matthew Eidson; Paul Wester





## *National Archives and Records Administration*

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8601 Adelphi Road  
College Park, Maryland 20740-6001

May 12, 2005

Larry Mills  
Securities and Exchange Commission  
6432 General Green Way, MS-0-24  
Alexandria, VA 22312

Dear Mr. Mills:

Please find enclosed your copy of the recently completed transfer document for the Investment Trust Company Datafile as of May, 1985 (IVT) (NN3-266-05-001). The Center for Electronic Records has completed processing of these accessions. Involved in this procedure is the preparation of a comprehensive documentation package for the datasets, verification of the individual data files against your agency supplied documentation, and the completion of preservation in accordance with the practices and procedures of the National Archives and Records Administration.

If there are any questions, please do not hesitate to contact me.

Sincerely,

BRETT L. ABRAMS  
Archives Specialist  
Center for Electronic Records  
Electronic and Special Media Records Services Division



# *National Archives and Records Administration*

8601 Adelphi Road  
College Park, Maryland 20740-6001

October 17, 2003

Larry Mills, Records Officer  
Securities and Exchange Commission  
6432 General Green Way, MS 0-24  
Alexandria, VA 22312

Dear Mr. Mills:

Please find enclosed your copy of the recently completed transfer document for the Ownership Reporting System, 1/11/98 to 12/31/2000 (NN3-266-03-001). The Center for Electronic Records has completed processing of the accession. Involved in this procedure is the preparation of a comprehensive documentation package for the datasets, verification of the individual data files against agency supplied documentation, and the completion of preservation in accordance with the practices and procedures of the National Archives and Records Administration.

If there are any questions, please do not hesitate to contact me.

Sincerely,

BRETT L. ABRAMS  
Archives Specialist  
Center for Electronic Records  
Electronic and Special Media Records Services Division



# *National Archives and Records Administration*

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8601 Adelphi Road  
College Park, Maryland 20740-6001

November 29, 2002

Larry Mills, Records Officer  
Securities and Exchange Commission  
6432 General Green Way, MS 0-24  
Alexandria, VA 22312

Dear Mr. Mills:

Please find enclosed your copy of the recently completed transfer document for two versions of the Proposed Sale of Securities System, 5/11/1994 to 9/30/99 and 1/3/99 to 9/29/2000 (NN3-266-03-003 and 03-002). The Center for Electronic Records has completed processing of the accession. Involved in this procedure is the preparation of a comprehensive documentation package for the datasets, verification of the individual data files against agency supplied documentation, and the completion of preservation in accordance with the practices and procedures of the National Archives and Records Administration.

If there are any questions, please do not hesitate to contact me. .

Sincerely,

BRETT L. ABRAMS  
Archives Specialist  
Center for Electronic Records  
Electronic and Special Media Records Services Division

# **AGREEMENT TO TRANSFER RECORDS TO THE NATIONAL ARCHIVES OF THE UNITED STATES**

1. INTERIM CONTROL NO. (NARA Use Only)

## **TERMS OF AGREEMENT**

The records described below and on the attached \_\_\_\_ pages are deposited in the National Archives of the United States in accordance with 44 U.S.C. 2107. The transferring agency certifies that any restrictions on the use of these records are in conformance with the requirements of 5 U.S.C. 552.

In accordance with 44 U.S.C. 2108, custody of these records becomes the responsibility of the Archivist of the United States at the time of transfer of the records. It is agreed that these records will be administered in accordance with the provisions of 44 U.S.C. Chapter 21, 36 CFR XII, 36 CFR Part 1256, and such other rules and regulations as may be prescribed by the Archivist of the United States (The Archivist). Unless specified and justified below, no restrictions of the use of these records will be imposed other than the general and specific

restrictions on the use of these records will be imposed other than the general and specific restrictions on the use of records in the National Archives of the United States that have been published in 36 CFR Part 1256 or in the *Guide to the National Archives of the United States*. The Archivist may destroy, donate, or otherwise dispose of any containers, duplicate copies, unused forms, blank stationery, nonarchival printed or processed material, or other non-record material in any manner authorized by law or regulation. Without further consent, the Archivist may destroy deteriorating or damaged documents after they have copied in a form that retains all of the information in the original document. The Archivist will use the General Records Schedule and any applicable records disposition schedule (SF 115) of the transferring agency to dispose of nonarchival materials contained in this deposit.

### 2A. AGENCY APPROVAL

Signature \_\_\_\_\_ Date \_\_\_\_\_

### 3A. NARA APPROVAL

Signature \_\_\_\_\_ Date \_\_\_\_\_

### 2B. NAME, TITLE, MAILING ADDRESS

Larry Mills  
Securities and Exchange Commission  
6432 General Green Way, MS 0-24  
Alexandria, VA 22312

### 3B. NAME, TITLE, MAILING ADDRESS

Brett Abrams  
National Archives & Records Administration  
Electronic & Special Media Records Services Division  
8601 Adelphi Road, College Park, MD 20740-6001

## **RECORDS INFORMATION**

4A. RECORDS SERIES TITLE **EDGAR Public Data of , 1992-1993**

4B. DATE SPAN OF SERIES (Attach any additional description)

### 5A. AGENCY OR ESTABLISHMENT

**Securities and Exchange Commission**

### 5B. AGENCY MAJOR SUBDIVISION

### 5C. AGENCY MINOR SUBDIVISION

### 5D. UNIT THAT CREATED RECORDS

### 5E. AGENCY PERSON WITH WHOM TO CONFER ABOUT THE RECORDS

Name: Larry Mills  
Telephone Number: (202) 551-7202

### 6. DISPOSITION AUTHORITY:

**N1-266-97-002**

7. IS SECURITY CLASSIFIED INFORMATION PRESENT? **XX** NO \_\_\_\_ YES

LEVEL: \_\_\_\_ Confidential \_\_\_\_ Secret \_\_\_\_ Top Secret

SPECIAL MARKINGS: \_\_\_\_ RD/FRD \_\_\_\_ SCI \_\_\_\_ NATO  
\_\_\_\_ Other

INFORMATION STATUS: \_\_\_\_ Segregated \_\_\_\_ Declassified

### 8. CURRENT LOCATION OF RECORDS

X  Agency (Complete 8A only)  
\_\_\_\_ Federal Records Center (Complete 8B only)

### 8A. ADDRESS:

### 9. PHYSICAL FORMS

**XX** Paper Documents \_\_\_\_ Posters  
\_\_\_\_ Paper Publications \_\_\_\_ Maps and Charts  
\_\_\_\_ Microfilm/Microfiche \_\_\_\_ Arch/Eng Drawings  
**XX** Electronic Records \_\_\_\_ Motion/Sound/Video  
\_\_\_\_ Photographs \_\_\_\_ Other (specify): \_\_\_\_\_

### 10. VOLUME:

Cu. Mtr.: \_\_\_\_ Cu.Ft.: \_\_\_\_

### CONTAINERS:

Number: 1 Type: DLT

### 1. DATE RECORDS ELIGIBLE FOR TRANSFER TO THE ARCHIVES

**January, 1998**

### 12. ARE RECORDS FULLY AVAILABLE FOR PUBLIC USE?

**XX** YES \_\_\_\_ NO (If no, attach limits on use and justification)

### 13. ARE RECORDS SUBJECT TO THE PRIVACY ACT?

\_\_\_\_ YES **XX** NO (If yes, cite Agency System Number and Federal Register volume and page number of most recent notice and attach a copy of this notice.)

### 14. ATTACHMENTS

\_\_\_\_ Agency Manual Except \_\_\_\_ Listing of Records Transferred  
\_\_\_\_ Additional Description  X  NA Form 14097 or Equivalent  
\_\_\_\_ Privacy Act Notice \_\_\_\_ Microform Inspection Report  
\_\_\_\_ Other (specify): \_\_\_\_ SF(s) 135

### 8B. FRC ACCESSION NUMBER

### CONTAINER NUMBERS

### FRC LOCATION

## **NARA PROVIDES**

### 15. SHIPPING INSTRUCTIONS TO AGENCIES/REMARKS REGARDING DISPOSITION

RG

### 16. RECORDS ACCEPTED INTO THE NATIONAL ARCHIVES OF THE UNITED STATES

Signature \_\_\_\_\_ Date \_\_\_\_\_

### 17. NATIONAL ARCHIVES ACCESSION NO.

TECHNICAL DESCRIPTION FOR TRANSFER OF ELECTRONIC RECORDS  
TO THE NATIONAL ARCHIVES

FILE IDENTIFICATION

OFFICIAL FILE TITLE, COMMONLY USED IDENTIFIER, AND/OR DESCRIPTIVE TITLE: EDGAR Public Data as of 1992-1993	02. ACRONYM ASSIGNED TO FILE: EDGAR
RESTRICTIONS ON ACCESS:	
04. TITLE/DESCRIPTION OF DOCUMENTATION PROVIDED:	05. FORMAT OF DOCUMENTATION: <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Electronic Format ( <i>Specify</i> ) <input type="checkbox"/> Other ( <i>Specify</i> ):
06. ELECTRONIC (Agency name and address):	07. IDENTIFY TECHNICAL CONTACT(S)

FILE CHARACTERISTICS

08. SHORT TITLE ON EXTERNAL LABEL	10. STORAGE MEDIA UNIT VOLUME SERIAL NUMBER:	12. DENSITY (CPI/BPI):
09. RETURN STORAGE MEDIA TO AGENCY AFTER ARCHIVAL PROCESSING: <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Provide Address for Return (if different from item 06):	11. TYPE OF MEDIA PROVIDED: <input type="checkbox"/> Open-Reel Magnetic Tape <input type="checkbox"/> 3480-Class Tape Cartridge <input type="checkbox"/> Other ( <i>Specify</i> ): CD	13. NUMBER OF TRACKS: <input type="checkbox"/> 7 <input type="checkbox"/> 9 <input type="checkbox"/> 18 <input type="checkbox"/> Other ( <i>Specify</i> ):
14. FILE ORGANIZATION ON STORAGE MEDIA <input type="checkbox"/> One File on One Media Unit <input type="checkbox"/> One File on Multiple Media Units <input type="checkbox"/> Multiple Files on One Media Unit <input type="checkbox"/> Multiple Files/Multiple Media Units	15. RECORDED LABEL (Internal Label) <input type="checkbox"/> IBM OS <input type="checkbox"/> IBM DOS <input type="checkbox"/> ANSI X 3.27 Standard <input type="checkbox"/> No Internal Labels <input type="checkbox"/> Other ( <i>Specify and Describe</i> )	16. CHARACTER SET <input type="checkbox"/> ASCII <input type="checkbox"/> EBCDIC <input type="checkbox"/> BCD (7 track only) <input type="checkbox"/> Binary <input type="checkbox"/> Packed Decimal <input type="checkbox"/> Other ( <i>Specify</i> )
17. DATE FILE COPIED:		
18. INTERNAL FILE NAME/IDENTIFIER (aka Data Set Name):	19. SEQUENCE OF FILE ON STORAGE MEDIA UNIT:  File                  of	20. NUMBER OF LOGICAL RECORDS (Blocking Factor):
21. RECORD TYPE <input type="checkbox"/> Fixed Length (F) <input type="checkbox"/> Fixed Length Blocked (FB) <input type="checkbox"/> Other Than Fixed Length ( <i>Specify Format</i> )	22. LENGTH OF LOGICAL RECORDS IN CHARACTERS OR BYTES:	24. NUMBER OF LOGICAL RECORDS:
	23. LENGTH OF PHYSICAL RECORDS IN CHARACTERS OR BYTES:	25. NUMBER OF PHYSICAL RECORDS (Blocks):

26. AGENCY COMMENTS:
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27. FORM PREPARED BY: Name:	Phone:	28. DATE FORM COMPLETED:
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## INSTRUCTIONS

### GENERAL:

The purpose of this form is to facilitate the transfer of electronic records with continuing or enduring value to the National Archives. A packet containing additional information on the transfer of electronic records is available from the National Archives. This form is not intended to take the place of other required documentation. FIPS PUB 20 contains a discussion of file documentation. Technical information describing each file is required by 36 CFR, but NA Form 14097 is optional. If there is an alternative reporting format that provides all of this required information, substitute the report for NA Form 14097. Include the required information as an attachment to the SF 258. A separate form should be completed for each file. If multiple files have very similar technical specifications, one form with an attachment that specifically identifies all of the files covered by the form may be used.

### IDENTIFICATION SECTIONS

01. **Official Title, Commonly Used Identifier, and/or Descriptive Title.** Enter the name by which the agency identifies the file. Consider how the title would appear in a bibliographic entry. If there is no official title, provide a descriptive title.
  02. **Acronym Assigned to File.** Enter the commonly used abbreviation or acronym as assigned by the agency. Often, the acronym as assigned by the agency. Often, the acronym will be used on the external (gummed) label of the storage media unit.
  03. **Restrictions on Access.** Specify any restrictions that apply to this file - cite FOIA exemption, and, if b (3), cite statute, indicate specific columns of types of records in the file that are affected; specify length of restriction on access and method of determining the date when restrictions end. If there are no applicable restrictions on access, please indicate.
  04. **Title/Description of Documentation Provided.** Documentation is required for all transfers of electronic records to the National Archives. Enter the title or description of the documentation provided by the agency for the file. Guidelines are available on the source and content of documentation. If any documentation is available in electronic form, include it in the transfer.
  05. **Format of Documentation Provide.** Mark all boxes that apply to the transfer with an "X." If "Electronic Format" is checked, include a technical description form for each documentation file in electronic format. If "Other" is checked, be as specific as possible in describing the documentation transferred.
  06. **Electronic Records Submitted by.** Enter the name and address of the agency that is responsible for the transfer.
  07. **Identify Technical Contact(s).** Identify the person who will respond to technical questions about the records if they arise during archival processing.
- ### FILE CHARACTERISTICS
08. **Short Title on External Label of Storage Media Unit.** Enter the short title that appears on the external (gummed) label of the storage media unit(s).
  09. **Return Storage Media to Agency After Archival Processing.** The National Archives returns the reels or cartridges included in the transfer to the agency when two preservation copies have been created. Check "No" to indicate that the storage media should not be returned or provide an address for return shipment. If yes, Provide Address for Return (if different from Item 06).
  10. **Storage Media Unit Volume Serial Number.** Enter the volume serial number which uniquely identifies this tape/tape cartridge. If the file is recorded on multiple

volumes, enter the first volume serial number in this item and list others, in sequence, in item 26.

11. **Type of Media Provided.** To comply with the transfer standard identified in 36 CFR, a storage media unit should be an open-reel magnetic tape or 3480 tape cartridge. Enter an "X" in the appropriate box. If "Other" is checked, contact the National Archives prior to transfer and provide a specific identification of the storage media used for transfer.
12. **Density (CPI/BPI).** Enter an "X" in the appropriate box to indicate characters or bytes per inch.
13. **Number of Tracks.** Enter an "X" in the appropriate box. For 7 track tapes, indicate whether the parity is odd or even in Item 26.
14. **File Organization on Storage Media.** If a single file on a single storage media unit is described, check "One File on One Media Unit." If a multi-volume file is described, check "One File on Multiple Media Units." If more than one file is on the storage media unit, check "Multiple Files on One Media Unit." If the transfer includes multiple files on multiple files on One media units, check "Multiple Files on Multiple Media Units."
15. **Recorded Label (Internal Label).** Enter an "X" in the appropriate box. If "Other" is checked, provide a specific description of the internal labels in Item 26.
16. **Character Set.** Enter an "X" in the appropriate box. If "Binary" or "Packed Decimal" is checked, indicate the characters (bytes) that are stored in those formats in Item 26.
17. **Date File Copied.** Enter the date that appears on internal labels, if the files are labelled. This is the date the records were copied onto the storage media unit(s).
18. **Internal File Name/Identifier (aka Data Set Name).** If there is a recorded label, enter the file identification (e.g., Data Set Name) used in the label. File Names in IBM standard labels should follow IBM DSN naming conventions.
19. **Sequence of File on Storage Media Unit.** If this is the only file on the storage media unit, enter a "1." If the storage media unit contains multiple files, enter the file's position number on the storage media unit. See Item 14.
20. **Number of Logical Records per Block (Blocking Factor).** If "Fixed Length" is checked in Item 21, enter the blocking factor.
21. **Record Type.** Enter an "X" in the appropriate box. If "Other Than Fixed Length" is checked, a specific description of the format is very important, especially if the documentation provided does not contain a precise description. Use Item 26 to describe "Other" formats.
22. **Length of Logical Records in Characters or Bytes.** Enter the logical record length in bytes or characters. If the record is not fixed length, enter the maximum size record, and describe techniques used to control and indicate size in Item 26.
23. **Length of Physical Records in Characters or Bytes.** Enter the physical record length in bytes or characters. If the record is not fixed length, enter the maximum size record, and describe techniques used to control and indicate size in Item 26.
24. **Number of Logical Records.** Enter the number of logical records in the file. This number is usually supplied by the program which created the file. Labels are not included in this count. If the last block is padded with blank records to fill out the block, please provide a total record count and a count of records that contain information.
25. **Number of Physical Records (Blocks).** Enter the number of

physical records (blocks). Labels are not included in this count.

26. **Comments.** Provide additional information as necessary or desired. If the information pertains to another item on the form, identify the relevant item number. Files transferred to the National Archives should not be software-dependent in accordance with 36 CFR. If there are any exceptions to this, identify the release and/or level of any

software required to read the file. Provide attachments if the information required will not fit in Item 26.

27. **Form Prepared By.** Enter the name and phone number (including area code) of the individual who prepared this form.
28. **Date Form Completed (YY/MM/DD).** Enter date this form was prepared.



**From:** Brett Abrams  
**To:** Larry Mills  
**Date:** Wed, Oct 6, 2004 11:16 AM  
**Subject:** Another old database

Hi Larry:

Hope all is well. Have finished up the accession of the the stack reel items and once my supervisors have done their reviews, I will send you the signed SF-258. I am starting to process another older data file, the Investment Trust Company data file as of May 1985. I have attached a SF-258 that I made for this series. I didn't find a copy from the past but, who knows, maybe you have one in your records.

What's the word on sending us a copy of the EDGAR data?

Best,

Brett

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Brett Abrams" <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** Thu, Oct 21, 2004 10:45 AM  
**Subject:** FW: NARA Data

Brett,

This is "fyi only".

You can see below, that I now have a contact from my IT Department. Once I meet with her, we will proceed to complete this.

Thanks,  
L. Mills

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From: Mills, Larry  
Sent: Tuesday, October 19, 2004 2:57 PM  
To: Peters, Cecile; Mills, Larry  
Cc: Heroux, Richard D.; Slocum, Shirley  
Subject: RE: NARA Data

Cecile,

Our next step is to set up a meeting with NARA to discuss the logistics of the transfer. I will contact NARA and coordinate a time for them to come to the Op. Ctr., and meet with us. I will bring some information to you to review.

L. Mills

---

From: Peters, Cecile  
Sent: Tuesday, October 19, 2004 11:07 AM  
To: Mills, Larry  
Cc: Heroux, Richard D.  
Subject: NARA Data

Larry-

Rick has assigned me to work with you on the NARA project. Please let me know the next step.

Thanks-

Cecile

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Brett Abrams" <Brett.Abrams@nara.gov>, "Peters, Cecile" <PETERSC@SEC.GOV>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** Thu, Oct 21, 2004 11:55 AM  
**Subject:** RE: NARA Data

Brett,

I will contact you after next week to set up a time to meet. Cecile Peters and Heather Mackintosh of our IT Department will be participating in the transfer. Either of them might call you with questions.

L. Mills

**CC:** "Heroux, Richard D." <HerouxR@SEC.GOV>, "Slocum, Shirley" <SlocumS@SEC.GOV>, "Mackintosh, Heather" <MackintoshH@SEC.GOV>

**From:** Brett Abrams  
**To:** Cecile, Peters,; Larry, Mills,  
**Date:** Thu, Oct 21, 2004 11:59 AM  
**Subject:** RE: NARA Data

Larry:

Thank you for all your effort on this project. Really look forward to getting the transfer of the data. Please feel free to have any person get in touch with me.

Best,

Brett

>>> "Mills, Larry" <MillsL@SEC.GOV> 10/21/04 11:55AM >>>

Brett,

I will contact you after next week to set up a time to meet. Cecile Peters and Heather Mackintosh of our IT Department will be participating in the transfer. Either of them might call you with questions.  
L. Mills

**CC:** D., Heroux, Richard; Heather, Mackintosh,; Shirley, Slocum,

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Brett Abrams" <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** Tue, Mar 29, 2005 12:42 AM  
**Subject:** RE: Following up on EDGAR data

Brett,

I will contact them, so we can bring this to closure. Things have been a little hectic around here, since a lot of staff are moving to a new building (Union Station's Station Place).

Thanks,  
L. Mills

-----Original Message-----

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Wednesday, March 23, 2005 9:21 AM  
To: MillsL@SEC.GOV  
Subject: Following up on EDGAR data

Hi Larry:

I realize that you are very busy. I have not received a transfer of the data and documentation from the EDGAR database. I am wondering if you would contact the IT people that were tasked to accomplish the transfer to NARA. I have included the information about who that was that you sent me months ago below. Obviously, they didn't call me or send the data as of yet.

Thanks,

Brett

Brett,

I will contact you after next week to set up a time to meet. Cecile Peters and Heather Mackintosh of our IT Department will be participating in the transfer. Either of them might call you with questions.  
L. Mills

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "'Brett Abrams'" <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** Tue, Aug 23, 2005 8:26 AM  
**Subject:** RE: Status of EDGAR transfer

Brett,

I'm working on it.

L. Mills

---

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Friday, August 05, 2005 8:47 AM  
To: Mills, Larry  
Subject: RE: Status of EDGAR transfer

Hi Larry:

I understand that you're very busy and I appreciate you continuing to be on this. Have a great weekend. Looking forward to hearing good news re EDGAR on Monday.

Brett

>>> "Mills, Larry" <MillsL@SEC.GOV> 08/04/05 06:33PM >>>

Brett,

I apologize for the delay. This will be my number one priority on Monday.

L. Mills

---

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Monday, July 11, 2005 9:01 AM  
To: Mills, Larry  
Subject: Status of EDGAR transfer

Good Morning arry:

I'm checking in to find out how the process of creating an archive copy of the EDGAR data is coming along. I recently had another group of people asking me about the whereabouts of this data so it appears the interest in this data is rising among higherups here.

Please let me know.

Brett

**From:** Brett Abrams  
**To:** Larry Mills  
**Date:** Thu, Jan 12, 2006 10:58 AM  
**Subject:** Status of EDGAR data transfer

Good Morning Larry:

I hope you are enjoying the new year. I haven't heard from you nor the IT people for awhile about the transfer to NARA of a copy of the EDGAR data and its documentation. I realize that there are limits on the time and resources of all the personnel that are involved in fulfilling a NARA transfer. Would you kindly provide me with insight into the status of the transfer of a copy of the data and documentation for EDGAR.

Thank you very much for your time and consideration.

Best,

Brett



**From:** Brett Abrams  
**To:** Larry Mills  
**Date:** Thu, Feb 2, 2006 10:01 AM  
**Subject:** EDGAR

Good Morning Larry:

Hope you are doing well today. I'm concerned about the transfer of the EDGAR data to NARA. The data is very important to this agency because researchers have made the PSS and ORS data some of the most highly requested data files in our custody and we believe this will be true for the EDGAR data as well.

I have included attachments that can provide assistance to the SEC IT staff responsible for exporting ascii files out of the ORACLE database platform.

I have cc'd my supervisors on this email because they have been wondering why I have not accomplished a transfer in the three plus years that I have been at this task.

Thanks for your time and consideration.

**CC:** Margaret Adams; Thomas Brown

**From:** Brett Abrams  
**To:** Mills, Larry; Peters, Cecile; Slocum, Shirley  
**Date:** Mon, Apr 3, 2006 7:43 AM  
**Subject:** Re: FW: Following Up Yesterday

Good Morning Larry and Cecile and Shirley:

Good news. NARA can preserve the test sample. Our technical staff would still appreciate it if we could receive the transferred material nontarred files. I realize that they could get very large because of this so maybe we can cut down on the number of CDs required to hold it all by sending only a year or two or three at a time.

I'm open to suggestions if that doesn't work.

Thanks for getting things started again. Let's keep the momentum going.

Cheers,

Brett

>>> "Mills, Larry" <MillsL@SEC.GOV> 03/06/06 10:07AM >>>

Cecile  
For your review.  
L. Mills

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Friday, March 03, 2006 7:55 AM  
To: Mills, Larry  
Subject: Following Up Yesterday

Hi Larry:

Thanks for organizing yesterday's meeting. I do not have Cecilia or Shirley's emails so if you could forward this email to them, I'd appreciate it.

I went through the old documents on the test transfers from the late 1990s and found out that NARA says it had the following issues:

need the most recent DTD from the SEC  
had problem with the extended ASCII character set  
(we had other problems related to our preservation system that hopefully are fixed now)

I am including the transfer standard guidelines for the six new formats that NARA wrote and a sheet I created about computer file formats for your information.

I look forward to receiving the test transfer from you folks soon and hope it works out well.

Have a great weekend.

Brett

**From:** "Peters, Cecile" <PETERSC@SEC.GOV>  
**To:** "Brett Abrams" <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>, "Slocum, Shirley" <SlocumS@SEC.GOV>  
**Date:** Thu, Apr 6, 2006 7:07 AM  
**Subject:** RE: FW: Following Up Yesterday

Brett-

Our production staff has now decided DLT is a better media option than CD. I am sorry for the inconvenience, but could I send you a test tape so that we can be sure you can read?

Cecile

---

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Monday, April 03, 2006 9:59 AM  
To: Mills, Larry; Peters, Cecile; Slocum, Shirley  
Subject: RE: FW: Following Up Yesterday

Great.

I believe the next step would be to put together a few of the first years of data on the CD-ROMS. After you send them to Larry, he does all he has to do and sends them with the SF-258s to me here at NARA.

Brett

>>> "Peters, Cecile" <PETERSC@SEC.GOV> 04/03/06 09:26AM >>>

OK, we can do that. Let me know the next step.

---

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Monday, April 03, 2006 9:14 AM  
To: Mills, Larry; Peters, Cecile; Slocum, Shirley  
Subject: RE: FW: Following Up Yesterday

Cecile:

They are saying that the NARA standard is to receive submissions untarred.

Brett

>>> "Peters, Cecile" <PETERSC@SEC.GOV> 04/03/06 09:13AM >>>

Brett-

Both the tarred and un-tarred versions of the filings were on the CD. Is your staff saying they can't find them, or they would like all future distributions of the filing data as un-tarred?

Thanks-

Cecile

---

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Monday, April 03, 2006 7:44 AM  
To: Mills, Larry; Peters, Cecile; Slocum, Shirley  
Subject: Re: FW: Following Up Yesterday

Good Morning Larry and Cecile and Shirley:

Good news. NARA can preserve the test sample. Our technical staff would still appreciate it if we could receive the transferred material nontarred files. I realize that they could get very large because of this so maybe we can cut down on the number of CDs required to hold it all by sending only a year or two or three at a time.

I'm open to suggestions if that doesn't work.

Thanks for getting things started again. Let's keep the momentum going.

Cheers,

Brett

>>> "Mills, Larry" <MillsL@SEC.GOV> 03/06/06 10:07AM >>>

Cecile

For your review.

L. Mills

---

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Friday, March 03, 2006 7:55 AM  
To: Mills, Larry  
Subject: Following Up Yesterday

Hi Larry:

Thanks for organizing yesterday's meeting. I do not have Cecila or Shirley's emails so if you could forward this email to them, I'd appreciate it.

I went through the old documents on the test transfers from the late 1990s and found out that NARA says it had the following issues:

need the most recent DTD from the SEC

had problem with the extended ASCII character set

(we had other problems related to our preservation system that hopefully are fixed now)

I am including the transfer standard guidelines for the six new formats that NARA wrote and a sheet I created about computer file formats for your information.

I look forward to receiving the test transfer from you folks soon and

hope it works out well.

Have a great weekend.

Brett

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Heroux, Richard D." <HerouxR@SEC.GOV>, "Peters, Cecile" <PETERSC@SEC.GOV>, "Brett Abrams" <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** 1/23/2007 10:07:51 AM  
**Subject:** NARA UNABLE TO READ EDGAR DATA

Rick,

Please have someone contact Bret Abrams at NARA and discuss the problem he is having with reading the EDGAR data. His number is 301-837-3674.

Thanks,  
L. Mills

**CC:** "Slocum, Shirley" <SlocumS@SEC.GOV>

**From:** Brett Abrams  
**To:** andersonv@sec.gov  
**Date:** 3/8/2007 2:21:30 PM  
**Subject:** transfer of EDGAR submissions

Good Afternoon Ms. Anderson:

Thank you for taking my call regarding the EDGAR submissions that were transferred to NARA on the Super DLTtape I.

Unfortunately NARA has only the DLT 8000 model reader so it can only cope with the DLT IV type of tape. That said, NARA has been accepting transfers of large amounts of data on external hard drives.

I'm hoping that this would be a solution to this long-time challenge.

This could offer the chance to transfer several more years of data beyond 1992-1993.

Please send this email on to the appropriate staff persons and let them know that I'm around to handle questions and issues.

My phone number is 301-837-3674 and email address is evident from this email. [brett.abrams@nara.gov](mailto:brett.abrams@nara.gov)

Thank you again.

Best,

Brett

**CC:** Larry Mills



**From:** Brett Abrams  
**To:** andersonv@sec.gov  
**Date:** 3/27/2007 7:27:38 AM  
**Subject:** Follow-up

Hi Ms. Anderson:

I'm wondering how the issue of the tape that I can't read is going. Is there a person that I need to follow up on this with at the unit?

Thanks,

Brett

**From:** Brett Abrams  
**To:** andersonv@sec.gov  
**Date:** 3/12/2007 9:13:28 AM  
**Subject:** Additional information

Good Morning Ms. Anderson:

Would you also forward this email to the proper people regarding the transfer to NARA. We believe that the EDGAR records being transferred are in XML. If that's right then we'll need documentation, such as the DTD for the records included in the transfer as well so that we can understand the records better.

Thanks,

Brett

**From:** Brett Abrams  
**To:** Mackintosh, Heather  
**Date:** 3/28/2007 9:07:17 AM  
**Subject:** Re: FW: Additional information

Good Morning HEather:

Thank you for responding.

There are two sets of issues in this project. The first set involves the data files themselves. NARA can receive the files if they are copied in ASCII. What we would also need is definitions for the content. Usually this includes the record layouts for each file and proper code lists for those fields that use codes.

The second set of issues involves how the files are shipped between the agency and NARA. Our problem with reading the last transfer involved the use of the Super DLT. We don't have machines capable of reading that cartridge currently. NARA has particular guidelines for the method of transfer of files from the agency to us. We accept DLT IV. Perhaps more realistically, we accept external hard drives and can also use FTP.

I don't think we need to do another test. We can accept a few years worth of the data if it is possible to put the data in ASCII, supply documentation to interpret the files, and transfer them via an external hard drive, or FTP.

Please feel free to ask me any questions.

Thank you very much for your time and consideration. I'm looking forward to getting this first transfer accomplished.

Best,

Brett

Dr. Brett Abrams  
Archives Specialist, NWME  
National Archives and Records Administration  
8601 Adelphi Rd.  
College Park, MD 20740  
301-837-3674  
email: Brett.Abrams@NARA.gov

>>> "Mackintosh, Heather" <MackintoshH@SEC.GOV> 3/28/2007 7:41 AM >>>  
Hi Brett,

Your EDGAR request has now gotten to me.

This is where we are:

The contractor that cut the CD for you is no longer working on EDGAR.

The SEC EDGAR person who was the POC is no longer working on EDGAR; however I was able to talk to her about the request. This is what she told me:

We copied 3 filings from 1992 to a CD. These 3 files were given to NARA to see if they could read them. NARA came back and said they could read them. We then cut a CD with all of 1992 data on it.

The records that were transferred were a copy of the documents the public submitted to EDGAR. They should have been in ASCII or HTML format. They should not have been in XML format as we did not allow XML before that time (I don't even think XML existed yet).

So...where to go from here.....

Since I don't have the original request about how you wanted the data outputted, I believe we must start this process again.

If you could forward me the original request, I will get a dozen files copied for you and see if you can read it. If so, then we will dump all of 1992 data again.

If you have another suggestion, I am open to doing something different.

Regards,

Heather Mackintosh  
Securities & Exchange Commission  
Office of Information Technology  
Office of EDGAR Management  
202.551-8111

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From: Anderson, Vanessa  
Sent: Monday, March 12, 2007 9:22 AM  
To: Heroux, Richard D.  
Cc: Mackintosh, Heather; Cox, E. Kenneth  
Subject: FW: Additional information

Rick -

More info from the NARA POC.

- Vanessa

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From: Brett Abrams [<mailto:Brett.Abrams@nara.gov>]  
Sent: Mon 3/12/2007 9:13 AM  
To: Anderson, Vanessa  
Subject: Additional information

Good Morning Ms. Anderson:

Would you also forward this email to the proper people regarding the transfer to NARA. We believe that the EDGAR records being transferred are in XML. If that's right then we'll need documentation, such as the DTD for the records included in the transfer as well so that we can understand the records better.

Thanks,

Brett

**From:** Brett Abrams  
**To:** Mackintosh, Heather  
**Date:** 3/28/2007 3:16:01 PM  
**Subject:** RE: FW: Additional information

Heather:

Only the public data is permanent and to be transferred to NARA. The non-public is temporary.

Brett

>>> "Mackintosh, Heather" <MackintoshH@SEC.GOV> 3/28/2007 9:36 AM >>>  
Brett,

Let me first clarify some things you may not know regarding EDGAR filings. You should think of EDGAR as a repository of documents. It should not be considered a repository of data. What we can give you is the documents and the meta data about the documents.

#### FACTS

- 1) The SEC is in control of what meta data is attached to a public filing
- 2) The contents of the public filing is not under SEC control for a large majority of filings. Exceptions
  - \* XML (Forms 3, 4, 5) and XBRL filings. For these, you would need a schema...however none of these filings would be on the 1992 data dump.

What this means is that I am confused on what you said "supply documentation to interpret the files." There is no documentation...whatever the public sends in is what we have. Example, if we accepted PDF documents...then the only thing we would store is 1) meta data about the document 2) the PDF document itself (we would not have anything in regard to how to interpret the PDF).

I am presuming that what you were given before was meta data and the documents. What I need to know is what meta data are you looking for?

For example, I just did a query in our system for a filing that came in on 12/4/92. Here is a snapshot of the meta data:

Here are the documents that are associated with the filing:

The 8-K is the "official" filing and the COVER is not consider part of the "official" filing. I have downloaded the documents from EDGAR and have attached them for you. Both of the documents are in ASCII.

The document meta data or the 8-K is:

doc\_id

30614

doc\_type\_code

8-K

sub\_id

123982

doc\_seqnum

1

doc\_file\_name

(null)

doc\_desc

FORM8-KREPORT FOR NOVEMBER

doc\_original\_size

2426

doc\_parsed\_size

2426

tms\_code

25

num\_bad\_ascii\_errors

0

num\_wide\_line\_errors

0

doc\_format\_status

5

doc\_format

5 (ASCII)

exception\_code

5

company\_folder\_id

(null)

filing\_folder\_id

(null)

priv\_type

PUB

delete\_flag

False

date\_modified

1993-04-10 00:37:09.900

doc\_format\_version

(null)

I think there is confusion over what EDGAR is and how data is stored in EDGAR.

Let me know your thoughts.



Heather Mackintosh  
Securities & Exchange Commission  
Office of Information Technology  
Office of EDGAR Management  
202.551-8111

-----Original Message-----

From: Brett Abrams [<mailto:Brett.Abrams@nara.gov>]  
Sent: Wednesday, March 28, 2007 9:07 AM  
To: Mackintosh, Heather  
Subject: Re: FW: Additional information

Good Morning HEather:

Thank you for responding.

There are two sets of issues in this project. The first set involves the data files themselves. NARA can receive the files if they are copied in ASCII. What we would also need is definitions for the content. Usually this includes the record layouts for each file and proper code lists for those fields that use codes.

The second set of issues involves how the files are shipped between

the agency and NARA. Our problem with reading the last transfer involved the use of the Super DLT. We don't have machines capable of reading that cartridge currently. NARA has particular guidelines for the method of transfer of files from the agency to us. We accept DLT IV. Perhaps more realistically, we accept external hard drives and can also use FTP.

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Please feel free to ask me any questions.

Thank you very much for your time and consideration. I'm looking forward to getting this first transfer accomplished.

Best,

Brett

Dr. Brett Abrams

Archives Specialist, NWME

National Archives and Records Administration

8601 Adelphi Rd.

College Park, MD 20740

301-837-3674

email: [Brett.Abrams@NARA.gov](mailto:Brett.Abrams@NARA.gov)

>>> "Mackintosh, Heather" <[MackintoshH@SEC.GOV](mailto:MackintoshH@SEC.GOV)> 3/28/2007 7:41 AM >>>

Hi Brett,

Your EDGAR request has now gotten to me.

This is where we are:

The contractor that cut the CD for you is no longer working on EDGAR.

The SEC EDGAR person who was the POC is no longer working on EDGAR;

however I was able to talk to her about the request. This is what she told me:

We copied 3 filings from 1992 to a CD. These 3 files were given to NARA

to see if they could read them. NARA came back and said they could read

them. We then cut a CD with all of 1992 data on it.

The records that were transferred were a copy of the documents the public submitted to EDGAR. They should have been in ASCII or HTML format. They should not have been in XML format as we did not allow XML before that time (I don't even think XML existed yet).

So...where to go from here.....

Since I don't have the original request about how you wanted the data outputted, I believe we must start this process again.

If you could forward me the original request, I will get a dozen files copied for you and see if you can read it. If so, then we will dump all of 1992 data again.

If you have another suggestion, I am open to doing something different.

Regards,

Heather Mackintosh

Securities & Exchange Commission

Office of Information Technology

Office of EDGAR Management

202.551-8111

---

From: Anderson, Vanessa

Sent: Monday, March 12, 2007 9:22 AM

To: Heroux, Richard D.

Cc: Mackintosh, Heather; Cox, E. Kenneth

Subject: FW: Additional information

Rick -

More info from the NARA POC.

- Vanessa

---

From: Brett Abrams [<mailto:Brett.Abrams@nara.gov>]

Sent: Mon 3/12/2007 9:13 AM

To: Anderson, Vanessa

Subject: Additional information

Good Morning Ms. Anderson:

Would you also forward this email to the proper people regarding the transfer to NARA. We believe that the EDGAR records being transferred are in XML. If that's right then we'll need documentation, such as the DTD for the records included in the transfer as well so that we can understand the records better.

Thanks,

Brett

Good Morning HEather:

Thank you for responding.

There are two sets of issues in this project. The first set involves

the data files themselves. NARA can receive the files if they are copied

in ASCII. What we would also need is definitions for the content.

Usually this includes the record layouts for each file and proper code

lists for those fields that use codes.

The second set of issues involves how the files are shipped between

the agency and NARA. Our problem with reading the last transfer involved

the use of the Super DLT. We don't have machines capable of reading that

cartridge currently. NARA has particular guidelines for the method of

transfer of files from the agency to us. We accept DLT IV. Perhaps  
more

realistically, we accept external hard drives and can also use FTP.

I don't think we need to do another test. We can accept a few years

worth of the data if it is possible to put the data in ASCII, supply

documentation to interpret the files, and transfer them via an  
external

hard drive, or FTP.

Please feel free to ask me any questions.

Thank you very much for your time and consideration. I'm looking

forward to getting this first transfer accomplished.



Best,

Brett

Dr. Brett Abrams

Archives Specialist, NWME

National Archives and Records Administration

8601 Adelphi Rd.

College Park, MD 20740

301-837-3674

email: [Brett.Abrams@NARA.gov](mailto:Brett.Abrams@NARA.gov)

>>> "Mackintosh, Heather" <MackintoshH@SEC.GOV> 3/28/2007 7:41 AM >>>

Hi Brett,

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NARA

to see if they could read them. NARA came back and said they could

read

them. We then cut a CD with all of 1992 data on it.

The records that were transferred were a copy of the documents the public submitted to EDGAR. They should have been in ASCII or HTML format. They should not have been in XML format as we did not allow XML before that time (I don't even think XML existed yet).

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copied for you and see if you can read it. If so, then we will dump

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of 1992 data again.

If you have another suggestion, I am open to doing something

different.

Regards,

Heather Mackintosh

Securities & Exchange Commission

Office of Information Technology

Office of EDGAR Management

202.551-8111

---

From: Anderson, Vanessa

Sent: Monday, March 12, 2007 9:22 AM

**From:** "Mackintosh, Heather" <MackintoshH@SEC.GOV>  
**To:** "Mackintosh, Heather" <MackintoshH@SEC.GOV>, "Brett Abrams" <Brett.Abrams@nara.gov>  
**Date:** 3/28/2007 4:03:28 PM  
**Subject:** RE: FW: Additional information

One more question.

Do you want Binary documents (PDF, JPG, and GIF formats) concatenated to the \*.dissem file as Uuencoded documents?

Heather Mackintosh  
Securities & Exchange Commission  
Office of Information Technology  
Office of EDGAR Management  
202.551-8111

---

From: Mackintosh, Heather  
Sent: Wednesday, March 28, 2007 4:01 PM  
To: 'Brett Abrams'  
Subject: RE: FW: Additional information

Brett,

I think I know where the confusion was in regard to what looked like XML.

Were you seeing something like:

Our files are dissminated out to the public as a .dissem, or .paper or .pc file.

.dissem: initial filing

.paper: meta data about paper documents

.pc: Post acceptance to initial filings

I am presuming you want all three...but let me know.

Heather Mackintosh

Securities & Exchange Commission

Office of Information Technology

Office of EDGAR Management

202.551-8111

-----Original Message-----

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]

Sent: Wednesday, March 28, 2007 3:16 PM

To: Mackintosh, Heather

Subject: RE: FW: Additional information

Heather:

Only the public data is permanent and to be transferred to NARA. The non-public is temporary.

Brett



**From:** Brett Abrams  
**To:** Heather Mackintosh  
**Date:** 4/9/2007 7:19:51 AM  
**Subject:** Re: Fwd: FW: Example of dissem file

Heather:

Good morning. Can you shed light on Greg's questions. He's in our IT shop.

Brett

**From:** Brett Abrams  
**To:** Lepore, Gregory; Mackintosh, Heather  
**Date:** 4/9/2007 8:21:55 AM  
**Subject:** RE: Fwd: FW: Example of dissemination file

Hi Heather:

The National Archives preserves records for the distant future. We want the data in an open format, usually ASCII flat files, or a standard such as XML. NARA plans to maintain the information for the far distant future researcher, of 20-50 years from now.

Let me know what open format makes sense for each of the types of information in EDGAR.

Brett

>>> "Mackintosh, Heather" <MackintoshH@SEC.GOV> 4/9/2007 8:08 AM >>>  
Greg/Brett,

The files are in ASCII. The markup is a hybrid of HTML. It is called SGML. Like HTML, there is no schema with it. The thing about these files are:

- \* There is a 256 byte part at the top of the file that has to be interpreted.

- \* The .dissem file contains the header data (meta data about the document), the text of the document, and has any graphics that are associated with the document encoded in the .dissem file

If the goal of this project is to be a repository of EDGAR data in case something happens to our system, we would want the data stored as .dissem, .paper, and .pac files. We can always reprocess these. If the goal of the project is to have the data in a format that others can read, then you would need to tell us your requirements and explain why others would go to this repository instead of the EDGAR repository we maintain.

Heather Mackintosh

Securities & Exchange Commission

Office of Information Technology

Office of EDGAR Management

202.551-8111

-----Original Message-----

From: Gregory Lepore [<mailto:Gregory.Lepore@nara.gov>]

Sent: Thursday, April 05, 2007 10:41 AM

To: Brett Abrams

Subject: Re: Fwd: FW: Example of dissem file

Brett,

I remember discussing these files but I can't recall the exact situation. Basically, the files are ASCII text and would present no preservation or access problems. However, I can't determine if they are accurate versions of the data they contain (if they've been converted from something else, for instance.) One of the files is part text/part HTML, the others look like pseudo-XML. If our goal is to work these up into a database, I don't think that would be easy, but if all we want to do is preserve the ASCII, then no problem.

Greg Lepore

Information Technology Specialist

Center for Electronic Records (NWME)

National Archives at College Park

8601 Adelphi Road, Rm 4300

College Park, MD 20740

Tel. (301) 837-0758

**Christina Bartlett - RE: OIEA schedule revisions**

**From:** "Hardy, John A. Jr." <HardyJo@sec.gov>  
**To:** "Christina Bartlett" <Christina.Bartlett@nara.gov>  
**Date:** 8/11/2005 8:30 AM  
**Subject:** RE: OIEA schedule revisions  
**CC:** "Mills, Larry" <MillsL@SEC.GOV>

Thanks. We are in the process of reviewing the revised schedule and will be back in touch with you shortly.

Jack Hardy  
202-551-6333

-----Original Message-----

From: Christina Bartlett [mailto:Christina.Bartlett@nara.gov]  
Sent: Wednesday, August 10, 2005 1:10 PM  
To: Hardy, John A. Jr.  
Cc: Mills, Larry  
Subject: OIEA schedule revisions

Hello Mr. Hardy,  
Please review the attached revised schedule, and please let me know if this accurately reflects your records. If it does not reflect the records of your office, then please make revisions and send back to me and Larry Mills, your records officer.

Thank you for your cooperation in this matter.

Christina Bartlett  
Senior Records Analyst  
Life Cycle Management Division  
National Archives and Records Administration  
8601 Adelphi Road  
College Park, MD 20740  
telephone:301-837-2073  
fax number:301-837-3697

## Christina Bartlett - OIEA SCHEDULE

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "'Christina Bartlett'" <christina.proctor@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** 6/29/2005 4:27 PM  
**Subject:** OIEA SCHEDULE

Christina,

OIEA Schedule attached.

L. Mills

-----Original Message-----

From: Christina Bartlett [mailto:christina.proctor@nara.gov]  
Sent: Monday, June 20, 2005 3:28 PM  
To: Mills, Larry  
Subject: RE: E-mail change and schedule status

Good Afternoon Larry,  
Thank you for kind words. I've waited to contact you, since you indicated that you are in the middle of a physical move to another location. When is your agency move finalized? What is your new address, telephone number, fax number and e-mail address?

Also, I can't move forward with the OIG schedule without a modified schedule. Can you send me an electronic copy as an attachment to an e-mail of the OIG schedule. I can make the modifications, send it back to you via e-mail for your approval. Then I can appraise the records. I think it would be easier for everyone if I meet with the program staff and conducted an interview. This should last 45 minutes. Can you give me a contact person and their telephone number?

I also need the OIEA schedule electronically to add the Agency Correspondence Tracking System (ACTS)-SEC to it. You indicated that you wanted to add ACTS to the OIEA schedule, isn't that correct? I can make the modifications, send it back to you via e-mail for your approval. Then I can appraise the records. I think it would be easier for everyone if I meet with the program staff and conducted an interview. This should last 45 minutes. Can you give me a contact person and their telephone number?

I can't register these schedules to move forward until these changes have been made. Please call me on 301-837-2073 if you have any questions regarding this request or need additional information.

Thank you.

Christina Bartlett  
Senior Records Analyst  
Life Cycle Management Division  
National Archives and Records Administration  
8601 Adelphi Road  
College Park, MD 20740  
telephone:301-837-2073  
fax number:301-837-3697

>>> "Mills, Larry" <MillsL@SEC.GOV> 6/6/2005 11:07:53 AM >>>  
Christina,

[REDACTED] (b)(6)

Regarding the schedules, in order to expedite the process, can we conduct the appraisals by e-mail? Currently, we are in the process of moving from

several buildings to our new Headquarters at One Station Place (beside Union Station in Washington DC.).

Thanks,  
L. Mills

-----Original Message-----

From: Christina Bartlett [mailto:christina.proctor@nara.gov]  
Sent: Monday, June 06, 2005 11:01 AM  
To: mills1@sec.gov  
Subject: E-mail change and schedule status

Good Morning Larry,

[REDACTED] (b)(6)

Also, you have submitted schedules for OIG, OIEA, and the ACTS database that I would like to meet and discuss them with you. I need to come and meet with program staff for conducting an appraisal as well. So, I thought we could set up a day when we can meet and I can do an appraisal.

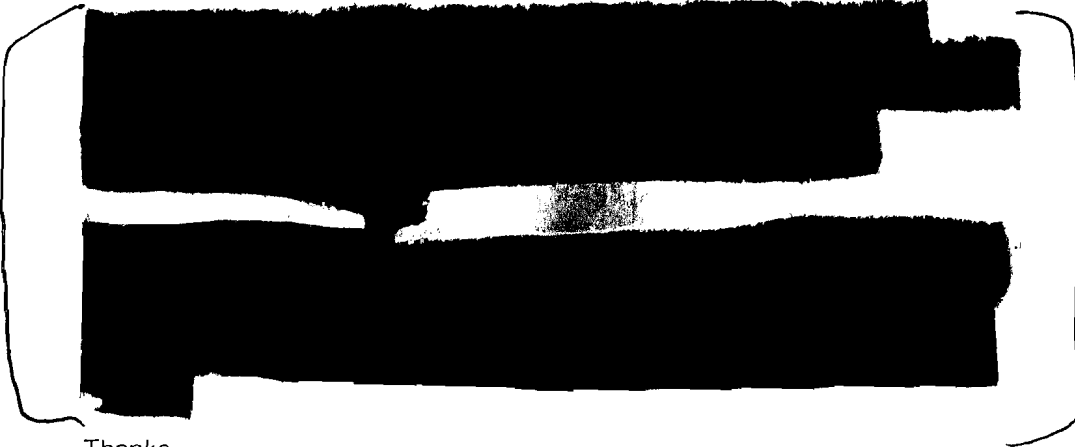
Please contact me at your earliest convenience, so we can work on getting these schedules registered, appraised, and completed.

Thank you.

Christina Bartlett  
Senior Records Analyst  
Life Cycle Management Division  
National Archives and Records Administration  
8601 Adelphi Road  
College Park, MD 20740  
telephone:301-837-2073  
fax number:301-837-3697

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Christina Proctor" <christina.proctor@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** Friday, October 22, 2004 4:16:59 PM  
**Subject:** RE: REQUESTS FOR DISPOSITION AUTHORITY

Christina,



(b)(5)

Thanks,  
L. Mills

-----Original Message-----

**From:** Christina Proctor [mailto:christina.proctor@nara.gov]  
**Sent:** Tuesday, October 19, 2004 9:42 AM  
**To:** MillsL@SEC.GOV  
**Subject:** RE: REQUESTS FOR DISPOSITION AUTHORITY

Larry,  
Alright, I'll pose future questions to you when scheduling records. I'll wait for your response to my questions I posed regarding the two schedules.

Thanks.  
Christina Proctor

>>> "Mills, Larry" <MillsL@SEC.GOV> 10/18/2004 4:05:59 PM >>>  
Christina,

I have been through this process with previous NARA appraisers and communication via e-mail, fax and telephone has been sufficient and expeditious. As the Records Officer, I can answer or quickly obtain any information you may need regarding how the records are used, etc. Hopefully, we can keep this process as simple as before.

Thanks,  
L. Mills

-----Original Message-----

**From:** Christina Proctor [mailto:christina.proctor@nara.gov]  
**Sent:** Friday, October 15, 2004 10:02 AM  
**To:** MillsL@SEC.GOV

Subject: RE: REQUESTS FOR DISPOSITION AUTHORITY

Good Morning Larry,

It is a requirement for me to meet with the program offices and the records officer to ask questions about how the records are created, how they are maintained, how are they used, how or why are these records initiated, and for me to look at the records. The records are usually kept with the program offices, and they can explain the organization of the records. Also, there is usually followup questions to expand on the original answers they give that happens at that moment. It has been my experience that it will be faster with an approximate hour long meeting per schedule, and I can't publish the Federal Register notice (45 days) until I have completed an approved appraisal report. The appraisal report is broken out into 3 categories: 1)background - describing the records creation and the process of creating, maintain and using these records, 2) records - describing what type of information is captured in these records, and 3)conclusion - explaining why I agree with the proposed disposition.

The Federal Register notice publication is a 45 day period. If someone requests a copy of the job and appraisal, the requestor has 30 days to review, before the schedule can be sent forward for approval to the Archivist of the United States. So, the Federal Register notice process, which waits for my completed appraisal report, can take as little as 45 days ( depending on whether or not the requestor requests the job early in the FR publication and the 30 days are absorbed into the 45 day period. Or it can take as long as 45 days for FR publication, 30 days for comments, and 30 days for NARA to respond to their comments. I rarely receive comments from requester.

I hope this helps explain the requirement for my visits with the Program office with your involvement.

Christina Proctor  
Senior Records Analyst  
Life Cycle Management Division  
National Archives and Records Administration  
8601 Adelphi Road  
College Park, MD 20740  
telephone:301-837-2073  
fax number:301-837-3697

>>> "Mills, Larry" <MillsL@SEC.GOV> 10/14/2004 5:28:18 PM >>>  
Christina,

I will be downtown on 10/21/04 attending NARA's RCP Forum and the BRIDG meeting.

Also, I will be off tomorrow. I will review the questions/concerns that you noted below and will give you a reply on Monday.

Instead of meeting with the program offices, you can communicate with me and I will communicate and get clarification and/or feedback from the program offices, as needed.

Thanks,



L. Mills

-----Original Message-----

From: Christina Proctor [mailto:christina.proctor@nara.gov]  
Sent: Thursday, October 14, 2004 11:11 AM  
To: MillsL@SEC.GOV  
Subject: RE: REQUESTS FOR DISPOSITION AUTHORITY

Hello Larry,

I did have a question about the IG schedule you sent me. You bolded a section, and I'm not clear if is this the only part that hasn't been approved on this schedule. Have the other items been approved under a previous schedule?

Also, I have a question about the OIEA schedule you submitted. You indicate that there are "Electronic" records. Are these scanned copies of the paper records Please provide more detail about these records. Also, I don't understand the last sentence in the description of the electronic records. It sounds to me like it is referring to paper records. Please clarify.

I would like to propose meeting with these program offices (IG and OIEA) on the same day if we could. I would suggest meeting next Thursday, October 21, and we could meet with one office at 10 am and the other office at 1pm. Are these offices located in your building or are these offices not at the same site?

Please contact me if you have any questions regarding my questions, and let me know if this date and times for these meetings will work with you and the program offices.

Christina Proctor  
Senior Records Analyst  
Life Cycle Management Division  
National Archives and Records Administration  
8601 Adelphi Road  
College Park, MD 20740  
telephone:301-837-2073  
fax number:301-837-3697

>>> "Mills, Larry" <MillsL@SEC.GOV> 10/12/2004 9:02:18 AM >>>  
Christina,

Ok. Thanks

L. Mills

-----Original Message-----

From: Christina Proctor [mailto:christina.proctor@nara.gov]  
Sent: Tuesday, October 12, 2004 8:08 AM  
To: MillsL@SEC.GOV  
Subject: Re: REQUESTS FOR DISPOSITION AUTHORITY

Good Morning Larry,

I received them the day before I left for a business conference, and this is my first day back in the office. It will take some time for these authorities to be approved. A Federal Register notice will have to be published for 45 days, and if someone requests a copy then they have 30 days to make comments. Also, I have to meet with these offices to discuss the schedules, so I can write an appraisal to be routed through the National Archives for the Archivist of the U.S. John Carlin to approve them.

Please let me know if you have any other questions regarding this process.

>>> "Mills, Larry" <MillsL@SEC.GOV> 10/06/2004 3:28:13 PM >>>

Hello Christina,

I hope all is well with you. Do you know the status of the 2 requests for disposition authority that I sent to you?

Thanks,  
L. Mills

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "christina.proctor@nara.gov" <christina.proctor@nara.gov>  
**Date:** Thursday, April 08, 2004 10:19:27 AM  
**Subject:** FW: SEC EDGAR ARCHIVE TAPES

-----Original Message-----

From: Mills, Larry  
Sent: Thursday, February 19, 2004 5:23 PM  
To: Mills, Larry; 'Brett Abrams'  
Subject: RE: SEC EDGAR ARCHIVE TAPES

Brett,

I was unable to retrieve and fax copies of the SF-258s today and I am off tomorrow. I will fax you copies on Monday morning.

L. Mills

-----Original Message-----

From: Mills, Larry  
Sent: Wednesday, February 18, 2004 2:36 PM  
To: 'Brett Abrams'; Mills, Larry  
Subject: RE: SEC EDGAR ARCHIVE TAPES

Brett,

I recall the below mentioned files and SF-258's have already been submitted for those.

L. Mills

-----Original Message-----

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Wednesday, February 18, 2004 2:33 PM  
To: MillsL@SEC.GOV  
Subject: Re: SEC EDGAR ARCHIVE TAPES

Hi Larry:

Your question regarding the Edgar Archive tapes caused me to search through our SEC materials. I came across the following four datafiles: Broker-Dealer Directory, Investment Advisor Directory, Corporation Index System and Investment Company Datafile System, as of March 1994. The SEC transferred them as unscheduled records stored on magnetic tapes to NARA's Data Processing Center in St. Louis in the spring of 1992. This St. Louis branch shipped them to the Machine-Readable Branch in December 1996. Since they were unscheduled records there was no accompanying SF-258. I am currently accessioning these four files and would appreciate having a SF-258 form to complete this work. Would you kindly sign the attached form and fax it back to me at (301) 837-3681.

Dr. Brett Abrams  
Archives Specialist  
8601 Adelphi Rd.  
College Park, MD 20740  
email: Brett.Abrams@NARA.gov

>>> "Mills, Larry" <MillsL@SEC.GOV> 02/17/04 06:59PM >>>  
Brett,

Do you have a copy of the paperwork (SF-258, etc.) for the EDGAR tapes that were previously transferred to NARA under the Disposition Authority 266-96-2? If so, please fax me a copy. My fax number is 703-914-4381.

I think the transfer was between 1997 and 1999.

Thanks,  
Larry Mills, Records Officer  
Securities and Exchange Commission

## Christina Proctor - RE: SEC EDGAR ARCHIVE TAPES

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** 'Brett Abrams' <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** 2/18/2004 11:13 AM  
**Subject:** RE: SEC EDGAR ARCHIVE TAPES

Brett,

We are working on effecting this transfer soon. Hopefully, we will be ready to begin coordinating with you this month. I will keep in contact.

Thanks,  
L. Mills

-----Original Message-----

From: Brett Abrams [mailto:Brett.Abrams@nara.gov]  
Sent: Wednesday, February 18, 2004 9:33 AM  
To: MillsL@SEC.GOV  
Subject: Re: SEC EDGAR ARCHIVE TAPES

Hi Larry:

NARA has a copy of the disposition agreement you mentioned, but a transfer of the EDGAR Archive tapes to NARA was never effected, thus we do not have the SF-258 and other forms.

We are looking forward to receiving a transfer of the EDGAR materials. I hope that we can effect a transfer of this important material to NARA in the near future.

Let me know if you need me to send you anything to assist in this process.

Best,

Brett

>>> "Mills, Larry" <MillsL@SEC.GOV> 02/17/04 06:59PM >>>  
Brett,

Do you have a copy of the paperwork (SF-258, etc.) for the EDGAR tapes that were previously transferred to NARA under the Disposition Authority 266-96-2? If so, please fax me a copy. My fax number is 703-914-4381.

I think the transfer was between 1997 and 1999.

Thanks,  
Larry Mills, Records Officer  
Securities and Exchange Commission

**From:** Brett Abrams  
**To:** Larry Mills  
**Date:** 10/14/2003 3:11PM  
**Subject:** EDGAR Public Data

Good Afternoon Larry:

I hope that you enjoyed the holiday yesterday. Since the new fiscal year is upon us, I'm looking through our lists of databases that have been scheduled for transfer to the Archives. I noticed that SEC has the EDGAR Public Data scheduled for permanent retention, item 3a, on schedule N1-266-96-002.

I am including a draft of the SF-258 and the 14097 form, the the items NARA uses for transfer. I imagine that the best bet for us would be to transfer a "snapshot" of the data, a view of the data as it was up to a particular date because it will continue to be on line and continue to change on a daily basis. I propose that we transfer the data as of September 30, 2003 if possible, since it is the end of a fiscal year.

Who would be the program and technical people that I will need to be in touch with in order to make the transfer of the data as efficient as possible?

Thank you for your time and consideration.

Best,

Brett

Dr. Brett Abrams  
Archives Specialist  
8601 Adelphi Rd.  
College Park, MD 20740  
email: Brett.Abrams@NARA.gov

**CC:** Aimee Felker

**Aimee Felker - RE: Thank you**

---

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Brett Abrams" <Brett.Abrams@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** 05/15/2003 12:51 PM  
**Subject:** RE: Thank you  
**CC:** Margaret Adams <margaret.adams@nara.gov>, Thomas Brown <thomas.brown@nara.gov>, "Slocum, Shirley" <SlocumS@SEC.GOV>

---

Abrams,

I checked with our Office of Technology and the answers to your questions are:

- SEC does not maintain the ORS databases anymore.
- SEC has discontinued this process; therefore, no additional ORS databases are available for transfer to NARA.
- The SEC does not have any revised versions of the January 1944 thru October 1997 data.

The ORS data was maintained in our mainframe operation. Our Office of Information Technology states, that since our mainframe system has been retired, they are unable to produce any more layout information for the ORS data.

I understand that in the past researchers used the ORS data that was transferred to the National Archives. However, now they will have to go to a private vendor; such as Thomson Financial, to acquire additional ORS information. The customer service number Thomson is (646) 822-2620.

L. Mills

-----Original Message-----

**From:** Brett Abrams [mailto:Brett.Abrams@nara.gov]  
**Sent:** Friday, April 25, 2003 11:38 AM  
**To:** millsL@sec.gov  
**Cc:** Margaret Adams; Thomas Brown  
**Subject:** Thank you

Dear Mr. Mills:

Thank you very much for the extensive effort you put forth to attempt to find documentation for the Broker Dealer Directory and the Investment Company Datafile. I met with two of the supervisors in our division regarding NWME's efforts to obtain the data from SEC this morning. We are hoping that we might be able to find solutions to the issue of NARA having custody of some of the SEC's older databases. Is the SEC still maintaining these databases, or is the data in another format? If either of these cases are true, then does the new database contain retrospective data? If the database does and we can transfer it to NARA, this could provide NARA with appropriate "replacement data" to maintain for these older databases for posterity and the use of researchers.

We appreciate the ORS and PSS accessions that you sent in August of 2001. NWME is wondering when more recent version of these data bases will be transferred to NARA. The ORS database is among the most highly used records in our custody. We have recently been made aware of some difficulties within the data in the ORS data files between January 1994 and October 1997. Will you be able to discover if there is a revised version of this data?

Phew! I realize that I have asked several questions and I appreciate your efforts on my behalf

Looking forward to speaking with you soon.

Sincerely,

Brett

Dr. Brett Abrams  
Archives Specialist  
8601 Adelphi Rd.  
College Park, MD 20740  
email: Brett.Abrams@NARA.gov



**Aimee Felker - Accession Number Master List (01) reports from WNRC**

---

**From:** Aimee Felker  
**To:** Mills, Larry  
**Date:** 04/01/2003 8:54 AM  
**Subject:** Accession Number Master List (01) reports from WNRC  
**CC:** Aimee Felker

---

Larry,

Last time I was out at the records center, I asked Victor Wagher about the (01) reports. They are no longer produced and automatically distributed unless the agency / records officer requests them.

Have you worked this out with Victor or would you like me to put in a standing order request for future (01) reports? Let me know if I can help.

Thanks,

Aimee

Aimee M. Felker  
Senior Records Analyst  
NARA/NWML  
301.837.0663  
Aimee.felker@nara.gov

>>> "Mills, Larry" <MillsL@SEC.GOV> 02/24/03 09:52AM >>>  
Aimee,

I have not received the January 2003 Accession Number Master List (01) from the WNRC for the SEC Holdings. Can you assist me with this or is there someone I need to contact?

Thanks,  
Larry Mills, Records Officer  
Securities and Exchange Commission  
(202) 942-7805

**From:** Ray Whitelock  
**To:** Alan Kramer; Andrew Jones; 'judy.barnes@suitland.nara.gov'; Mills, Larry  
**Date:** 2/12/02 1:05PM  
**Subject:** RE: FRC BOXES REPLY

Feb. 12, 2002

Larry,

GSA has awarded the Manufacture of FRC Boxes to NISH .  
They are "protected" by Javitts-O'Day

However, we have found that we can "negotiate" a per box or bundle price with commercial office product vendors when we buy in "bulk" defined as over 300 boxes or 12 bundles.

If your purchasing agent will log on to [www.gsa.advantage.gov](http://www.gsa.advantage.gov)  
and search by the NSN 8115-00-117-8249  
a list of vendors with their per bundle or each price will be listed.

Our cheapest negotiated price was from Miller Office Products @ \$45.25 per bundle or \$1.81 each. GSA's advantage web site showed \$2.09 each

We ordered 3,000 in that instance. (Note: For a very large quantity you may have to wait for delivery directly from the MFG National Center for Employment of the Disabled in El Paso, TX 79936  
Contract # BSH-GS-02F-61567

GSA will allow the NISH MFG's to offer discounts for orders placed directly with the MFG.

Our Point of Contact for Miller's Office Products in Springfield, VA 8404 Aban Rd. is Mr. Len Smith  
1-800-664-6097

Hope this saves a few \$\$\$

>>> "Mills, Larry" <MillsL@SEC.GOV> 02/12/02 10:40AM >>>

> -----Original Message-----

> From: Mills, Larry

> Sent: Thursday, February 07, 2002 3:16 PM

> To: 'alan.kramer@suitland.nara.gov'; 'judy.barnes@suitland.nara.gov';

> 'andrew.jones@suitland.nara.gov'; Mills, Larry

> Cc: 'cary.conn@nara.gov'

> Subject: FRC BOXES

>

> Hello,

>

> We have been approached by a company that can provide us with an exact  
> replica of the FRC boxes which we currently purchase through GSA.

>

> Question: As long as the boxes meet the specifications (1 cubic foot, same  
> printing, etc.), is it okay for us to purchase the boxes from a source  
> other than GSA?

>

> Thanks,

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "alan.kramer@suitland.nara.gov" <alan.kramer@suitland.nara.gov>, "judy.barnes@suitland.nara.gov" <judy.barnes@suitland.nara.gov>, "andrew.jones@suitland.nara.gov" <andrew.jones@suitland.nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** 2/7/02 3:14PM  
**Subject:** FRC BOXES

Hello,

We have been approached by a company that can provide us with an exact replica of the FRC boxes which we currently purchase through GSA.

Question: As long as the boxes meet the specifications (1 cubic foot, same printing, etc.), is it okay for us to purchase the boxes from a source other than GSA?

Thanks,  
L. Mills

**CC:** "cary.conn@nara.gov" <cary.conn@nara.gov>

**Cary Conn - RE: Records in Philadelphia**

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Stirling-Godfrey, Linda" <StirlingLA@SEC.gov>  
**Date:** 01/17/2002 4:14 PM  
**Subject:** RE: Records in Philadelphia  
**CC:** "Slocum, Shirley" <SlocumS@SEC.GOV>, "Mandic, Frank" <MandicF@SEC.GOV>, "Willis, Cherisse" <BryantC@SEC.GOV>, "laura.mchale@nara.gov" <laura.mchale@nara.gov>, "cary.conn@nara.gov" <cary.conn@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>

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Linda,

This is a follow-up to our conversation today. I spoke with Laura of NARA's Philly office regarding this records disposition project. She was not clear that the investigative records involved were active (still open) and had not reached the stage for our approved disposition authority. However, she stated that they would grant an exception and accept the records.

Regarding the BD/IA Examination/Inspection Reports the disposition authority has been in effective since May 1991 and the most current procedures for disposition of this material was distributed in September 1997. I will fax you a copy of the procedures.

I am attaching a sample SF-135 for your use. I have attempted to complete most of the information for you. We will need to discuss the form in order for you to complete the remaining information. The SEC Records Retention Schedule is available at: <http://ardor.nara.gov/sec/index.html>

We will need to discuss the Inter-agency Agreements between NARA and SEC to determine how they apply to storage and deliveries at a NARA Regional Office.

Please contact me if you have any questions. I will contact you tomorrow to see how everything is progressing.

L. Mills

-----Original Message-----

From: Stirling-Godfrey, Linda  
 Sent: Wednesday, January 16, 2002 5:12 PM  
 To: Mills, Larry  
 Subject: RE: Records in Philadelphia

Hi Larry:

I left you an earlier voice mail message regarding the archiving of our files. I just found out Monday that we have a national account with the NARA, however, the individual contract must be signed in Philadelphia. The boxes being archived in Philadelphia are cases that cannot be closed and may need to be retrieved within 24 ours. In addition, the retention for IA/BD files is now 13 years instead of 6. Therefore, we are very quickly running out of storage space. I intended to speak with someone in your office regarding disposal dates and authority that need to be placed on the 135.

Please call me at your earliest convenience so we can discuss.

Thank you in advance for your assistance.

Linda Stirling-Godfrey

-----Original Message-----

From: Mills, Larry  
 Sent: Wednesday, January 16, 2002 11:10 AM  
 To: Stirling-Godfrey, Linda; Mills, Larry  
 Cc: Slocum, Shirley; Mandic, Frank  
 Subject: FW: Records in Philadelphia

Linda,

I have received calls from Laura McHale of NARA's Philadelphia Office and the e-mail below from Cary Conn (SEC's Archivist at NARA in College Park) informing me that you are attempting to disposition 1,000 cubic feet of records. I informed them that I had not authorized the transfer of the records.

I need to know exactly what is going on? Our staff can assist in facilitating the process; ensuring the proper authorization, completion of proper forms (SF-135's and Indexes), and billing under the Interagency-Agreement presently set up with NARA for storage and processing of records.

Thanks,  
Larry Mills, Records Officer

-----Original Message-----

From: Cary Conn [<mailto:cary.conn@nara.gov>]  
Sent: Wednesday, January 16, 2002 9:33 AM  
To: MillsL@SEC.GOV  
Cc: David Roland; Laura McHale  
Subject: Records in Philadelphia

Larry,

I understand that you and Laura McHale have been exchanging voice mails. Your Philadelphia office has contacted our office for assistance. It seems you could help them with the scheduling aspects and we can help with the physical. They need to know what disposition applies to the records in their custody. Once that is determined, we can proceed.

If you need to contact us please feel free to do so. Laura McHale at 215-671-1839 or Cary Conn at 301-713-7110 x 277.

**Cary Conn - RE: URGENT - RETRIEVING RECORDS TRANSFERRED TO NARA**

**From:** "Mills, Larry" <MillsL@SEC.GOV>  
**To:** "Cary Conn" <cary.conn@nara.gov>, "Mills, Larry" <MillsL@SEC.GOV>  
**Date:** 06/12/2001 10:14 AM  
**Subject:** RE: URGENT - RETRIEVING RECORDS TRANSFERRED TO NARA

---

Cary,

Understood.

Thanks,  
L. Mills

-----Original Message-----

From: Cary Conn [<mailto:cary.conn@nara.gov>]  
Sent: Tuesday, June 12, 2001 10:02 AM  
To: MillsL@SEC.GOV  
Subject: Re: URGENT - RETRIEVING RECORDS TRANSFERRED TO NARA

Larry,

This is not a matter that I have any control over. I turned your request over to Clarence Lysons. He is the person who has custody of the records and administers research or loans. Loans of records are rarely granted, because we have excellent research facilities and easy means for making copies. Agency personnel often feel that it is an imposition to visit the archives to do a search, but when record schedules are drafted the agency's personnel help determine how long records are needed for agency business. In this case, an unexpected need for the records has risen and a brief trip to the archives, by a person who knows what is being sought, should meet that need. If it is a matter of needing originals for legal affairs, certified copies can be provided. This is just the normal way business is done. Good luck.

Cary

>>> "Mills, Larry" <MillsL@SEC.GOV> 06/11/01 04:23PM >>>  
Cary,

We are having difficulty retrieving some records that were permanently transferred to NARA. These records are urgently needed for an civil injunction matter. We understand that the records are in the legal custody of NARA; however, in accordance with 36 CFR 1228.80, we are requesting use of the them. This request is for urgent use, not routine reference.

The retrieval information for the records is as follows:

1. Accession Number 266-83-27, box 2
2. Accession Number 266-83-27, box 4

The NN3 number for both is NN3-266-00-001

When Anthony Abbott of my staff contacted NARA, they were told by Clarence Lyons and Wayne Decesar, (301)-713-7230, that the records would not shipped to SEC, but that we would have to go out to NARA and view them.

Thanks,  
Larry Mills, Records Officer, SEC  
202-942-7805



OFFICE OF FILINGS AND  
INFORMATION SERVICES

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
OPERATIONS CENTER  
6432 GENERAL GREEN WAY  
ALEXANDRIA, VIRGINIA 22312-2413

10/15/01

October 11, 2001

National Archives & Records Administration  
Attn.: John W. Carlin, Archivist of the United States  
8601 Adelphi Road  
College Park, Maryland 20740-6001

Dear Mr. Carlin:

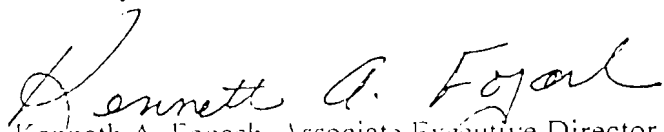
Thanks for your letter expressing sympathy for the losses experienced by the Securities and Exchange Commission (SEC) as a result of the tragic circumstances at the World Trade Center in New York on September 11<sup>th</sup>. Fortunately, we did not lose a single employee.

We are in the process now of recovering and reconstructing records. As you stated in your letter, it is possible that temporary records currently stored in the NARA records storage facilities may be helpful in reconstructing missing or destroyed documentation. We currently have an inventory of the SEC records stored at the NARA records center in Suitland, Maryland. We will contact the NARA records center in Lee's Summit, Missouri to obtain an inventory of the SEC records stored there.

Therefore, we would indeed like for NARA to delay for up to six months, at no cost to the SEC, the regular scheduled destruction of any records belonging to the SEC offices that were located in the World Trade Center.

Again, thanks for your sympathy and cooperation.

Sincerely,

  
Kenneth A. Fogash, Associate Executive Director  
Office of Filings and Information Services

Harvey L. Pitt  
Chairman  
Securities and Exchange Commission  
450 Fifth Street, NW  
Washington, DC 20549

Dear Mr. Pitt,

On behalf of the staff of the National Archives and Records Administration (NARA), I would like to express our sympathy for the losses experienced by the Securities and Exchange Commission (SEC) as a result of the tragic circumstances at the World Trade Center in New York City on September 11. We commend the men and women who are working so hard to continue SEC's operations throughout this trying time.

As recovery operations continue, your staff may discover that records needed to document SEC matters or provide operational information have been destroyed. It is possible that temporary records currently stored in NARA records storage facilities may be helpful in reconstructing missing or destroyed documentation.

To that end, NARA staff will contact your records staff to determine if the destruction of any eligible records should be delayed. NARA will delay for up to six months, at no cost to the SEC, the regularly scheduled destruction of any records belonging to SEC offices that were located in the World Trade Center. If you have any questions concerning temporary SEC records currently stored at NARA's records center in Lee's Summit, Missouri, the NARA repository that serviced the World Trade Center agencies, please have your staff contact Dean Donovan, Director, at 816-823-5230, or by email at [dean.donovan@nara.gov](mailto:dean.donovan@nara.gov).

If you have any other questions about your New York-based records or need records-related assistance, please contact Diane P. LeBlanc, NARA's Regional Administrator for the Northeast Region, at 781-647-8745, or by email at [diane.leblanc@nara.gov](mailto:diane.leblanc@nara.gov).

The staff at NARA joins the rest of the Federal workforce in sending our condolences to the SEC employees who have been affected by this tragedy.

Sincerely,

JOHN W. CARLIN

JOHN W. CARLIN  
Archivist of the United States



Official file – NWML  
Reading file - NWML

File - \_\_\_\_\_

N  
NR, Weinberg  
NRA-B, Fawcett  
NRA-B, LeBlanc  
NREL, Donovan  
NPOL  
NWML, Conn

cc: Larry Mills  
Securities and Exchange Commission  
Mail Stop A-3  
6441 D General Green Way  
Alexandria VA 22312

Frederick/jh/10/02/2001

S:/correspondence/condolences, NY, SEC