Attachment A

DEFINITIONS & ADDITIONAL INSTRUCTIONS

A. "**Breach**" shall mean an incident in which sensitive, protected or confidential data has potentially been viewed, taken, or used by an unauthorized individual.

B. **"Acquiring Bank" or "Acquirer"** shall mean (a) a bank, financial institution or other company, including its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, that acquires and processes payment card transactions from merchants; and (b) any payment processors, independent sales organizations, membership service providers or other third parties contracted by a bank or financial institution to provide merchant acquiring or payment processing services.

C. **"Attestation of Compliance" or "AOC"** shall mean a form for merchants and service providers to attest to the results of a PCI DSS Compliance Assessment, as documented in the Report on Compliance.

D. "**Company**" shall mean [Company], its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, members, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Data Security Forensic Audit Services**" shall mean services related to examining a computer network following a Breach or other security incident in order to determine the cause and extent of the Breach or other security incident.

F. "**Data Security Services**" shall mean services related to the security of computer networks, including audits, assessments, programs, monitoring services, or the establishment of a computer network.

G. "**Identify**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if

I.   "**Order"** shall mean the Order, including the attached Resolution, Specifications, and Attachment.

        I.

R.   **Applicable Time Period**: Unless otherwise directed in the specifications, the applicable time period for the request shall be from **January 1, 2013 until the date of full and complete compliance with this Order.**

S.   **Document Production**: Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS.

T.   **Production of Copies**: Copies of marketing materials and advertisements shall be produced in color, and copies of other materials shall be produced in color if necessary to interpret them or render them intelligible.

U.   **Sensitive Personally Identifiable Information**: If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss whether it would be appropriate to redact the sensitive information. If that information will not be redacted, contact us to discuss encrypting any electronic copies of such material with encryption software such as SecureZip and provide the encryption key in a separate communication.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or phone number in combination with one or more of the following: date of birth; Social Security number; driver's license number or other state identification number or a foreign country equivalent; passport number; financial account number; credit card number; or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

Federal Trade Commission, Bureau of Consumer Protection Production Requirements

Production Metadata

10. Family Relationships: Regardless of form of production, preserve the parent/child
    relationship in all files as follows:

    a. Produce attachments as separate documents and number them consecutively to the
        parent file.

    b. Complete the ParentID metadata field for each attachment.

11. Document Numbering and File Naming

    a. Each document must have a unique document identifier ("DOCID") consisting of
        a prefix and 7-digit number (e.g., ABC0000001) as follows:
        i.   The prefix of the filename must reflect a unique alphanumeric designation,
             not to exceed seven (7) characters identifying the producing party. This
             prefix must remain consistent across all productions.
        ii. The next seven (7) digits must be a unique, consecutive numeric value
             assigned to the item by the producing party. Pad this value with leading
             zeroes as needed to preserve its 7-digit length.
        iii. Do not use a space to separate the prefix from numbers.

    b. Name each native or near native file with its corresponding DOCID number and
        appropriate file extension (e.g., ABC0000001.doc).

12. Load File Format

    a. Produce metadata in a delimited text file (.DAT) for each item included in the
        production. The first line of the delimited text file must contain the field names.
        Each subsequent line must contain the metadata for each produced document.

    b. Use these delimiters in the delimited data load file:

Description	Symbol	ASCII Code
Field Separator	¶	020
Quote Character	Þ	254
New Line	®	174
Multiple Field Entries	;	059

13. The following chart describes the required metadata for native, scanned, and redacted
    documents. If you want to submit additional metadata, discuss with the FTC prior to
    production.

Production Metadata				
Field Name	Native	Scanned	Redacted	Format
DOCID	Y	Y	Y	Alphanumeric (*see* #11 above)
PARENTID	Y	Y	Y	Alphanumeric

NATIVELINK	Y	Y	Y	Alphanumeric
CUSTODIAN	Y	Y	Y	Alphanumeric
RESPSPEC	Y	Y	Y	Alphanumeric (question # record responds to)
ORIGFILENAME	Y		Y	Alphanumeric
ORIGPATH	Y		Y	Alphanumeric
CONFIDENTIAL	Y	Y	Y	Boolean - Y/N
HASH	Y	Y	Y	Alphanumeric
From			Y	Alphanumeric
To			Y	Alphanumeric
CC			Y	Alphanumeric
BCC			Y	Alphanumeric
EmailSubject			Y	Alphanumeric
DateSent			Y	MM/DD/YYYY HH:MM:SS AM/PM
DateRcvd			Y	MM/DD/YYYY HH:MM:SS AM/PM
Author			Y	Alphanumeric
Subject			Y	Alphanumeric

DateCreated

c.   The numeric range of documents included in the production.
The number of documents included in the production.