

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Edith Ramirez, Chairwoman
Julie Brill
Maureen K. Ohlhausen
Joshua D. Wright
Terrell McSweeney

In the Matter of)
)
)
GMR TRANSCRIPTION SERVICES, INC.,)
a corporation,)
)
AJAY PRASAD) DOCKET NO. C-4482
)

Consent Agreement and placed such Consent Agreement on the public record for a period of thirty (30) days, and having duly considered the comments filed thereat by interested persons pursuant to Commission Rule 2.34, 16 C.F.R. § 2.34, now in further conformity with the procedure described in Commission Rule 2.34, the Commission hereby issues its Complaint, makes the following jurisdictional findings and enters the following Order:

1. Respondent GMR is a California corporation with its principal office or place of business at 2512 Chambers Road, Suite 206, Tustin, CA 92780.
2. Respondents Ajay Prasad ("Prasad") and Shreekant Srivastava ("Srivastava") are co owners of GMR and President and Vice President of the company, respectively. Individually or in concert with others, they formulate, direct, or control the policies, acts, or practices of respondent GMR. Their principal place of business is the same as GMR.

ORDER

DEFINITIONS

For purposes of this order, the following definitions shall apply:

1. Unless otherwise specified, "respondent" shall mean GMR Transcription Services, Inc., and its successors and assigns, and Ajay Prasad and Shreekant Srivastava.
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I.

IT IS ORDERED that respondent and their officers, agents, representatives, and employees

- E. the evaluation and adjustment of the information security program in light of the results of the testing and monitoring required by subpart C, any material changes to any operations or business arrangements, or any other circumstances that respondents know or have reason to know may have a material impact on the effectiveness of the information security program.

III.

IT IS FURTHER ORDERED that, in connection with its compliance with Part II of this order, respondents shall obtain initial and biennial assessments and reports (“Assessments”) from a qualified, objective, independent third party professional, who uses procedures and standards generally accepted in the profession. Professionals qualified to prepare such assessments shall be: a person qualified as a Certified Information System Security Professional (CISSP) or as a Certified Information Systems Auditor (CISA); a person holding Global Information Assurance Certification (GIAC) from the ISNS Institute; or a qualified person or organization approved by the Associate Director for Enforcement, Bureau of Consumer Protection, -2(w >>BDC -2(i)-2ins)-1 (um
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the U.S. Postal Service) to the Associate Director of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, D.C. 20580, with the subject line In the matter of GMR Transcription Services, FTC File No. 1123120. Provided, however, that in lieu of overnight courier, notices may be sent by first class mail, but only if an electronic version of any such notice is contemporaneously sent to the Commission at Debrief@ftc.gov.

IV.

IT IS FURTHER ORDERED that respondents shall maintain and, upon request, make available to the Federal Trade Commission for inspection and copying:

- A. for a period of three (3) years after the date of preparation of each Assessment required under Part III of this order, all materials relied upon to prepare the Assessment, whether prepared by or on behalf of respondents (b) (5) - (D) (s) - Assessment material, and asblpr tss

- B. Respondents shall secure a signed and dated statement acknowledging receipt of this order, within thirty (30) days of delivery, from all persons receiving a copy of the order pursuant to this section.

VI.

IT IS FURTHER ORDERED that respondents Prasad and Srivastava for a period of ten (10) years after the date of issuance of the order, shall, notify the Commission of the following: (a) Any changes to respondent Prasad's or respondent Srivastava's residence, mailing addresses and/or telephone numbers, within ten (10) days of the date of such change; (b) Any changes in respondent Prasad's or respondent Srivastava's employment status (including self employment), and any changes in ownership in any business entity, within ten (10) days of date of such change. Such notice shall include: the name and address of each business that respondent Prasad or respondent Srivastava is affiliated with, employed by, creates or forms, incorporates, or performs services for; a detailed description of the nature of the business; and a detailed description of respondent Prasad's or respondent Srivastava's duties and responsibilities in connection with the business or employment; and (c) Any changes to respondent Prasad's or respondent Srivastava's name or use of any aliases or fictitious names, including business names. All notices required by this Part shall be sent by overnight courier (not the U.S. Postal Service) to the Associate Director of Enforcement Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, D.C. 20580, with the subject line In the matter of GMR Transcription Services, Inc., FTC File No. 1123120. Provided, however that in lieu of overnight courier, notices may be sent by first class mail, but only if an electronic version of any such notice is contemporaneously sent to the Commission at Debrief@ftc.gov.

VII.

IT IS FURTHER ORDERED that respondents shall notify the Commission at least thirty (30) days prior to any change in respondent's status that may affect compliance obligations arising under this order, including, but not limited to, a dissolution, assignment, sale, merger, or other action that would result in the emergence of a successor company; the creation or dissolution of a subsidiary, parent, or affiliate that engages in any acts or practices subject to this order; the

