

SEC Rule 17a-4(f)**Requirement Summary**

Preserve the records exclusively in a non-rewriteable, non-erasable format

Verify automatically the quality and accuracy of the storage media recording process

Serialize the original and any duplicate units of storage media, and time-date for the required period of retention

Have the capacity to readily download electronic indexes and records to any medium acceptable under this rule as required

At all times have easily readable projection or productions of micrographic media or electronic storage media images available for

Be ready at all times to immediately provide a facsimile enlargement which the Commission or its representatives may request

Store a duplicate copy of the record separately from the original on any medium acceptable under ss240.17a-4 for the time required

Organize and index accurately all information maintained on both the original and any duplicate storage media, making all indexes available

Each index must be duplicated and stored separately from the original copy of each index. Original and duplicate indexes must be preserved

An audit system must be in place that provides for accountability regarding inputting of records required to be maintained-and any changes made to the original-and preserved pursuant to

All results of such an audit must be available for examination at all times and preserved for the time required for audited records

All information necessary to access records and indexes stored on the electronic storage media must be kept current and accessible; or placed in escrow with the appropriate documentation and information

For every member, broker, or dealer exclusively using electronic storage media for record preservation under this section, at least one third party

Prepared by LSSP Corporation**DocuMS Document Management - How it performs the function**

Documents and files can be archived at anytime in the system to non-writable media, and cataloged for retrieval. At archive time, the system also stores a restore directory for ease of restoring back to the system. Indexes are extracted for each document

DocuMS does not do this currently. We can place a utility into the software called Nero, which validates the media as well. This would mean that each location would have to purchase Nero from LSSP or from a preferred vendor. Requirement would be one c

Built-in to the system for retention period templates based on document type, and is assigned by the user.

Built in to the system.

Once media is created, the system can even point to a backup copy via mapping, and open up the database. Also, the archive media can be used to locate the documents as they are entered in a comment at archive extraction time.

Easily performed by a couple of means, even copy entire DB out, and allow access to the representatives, even with disabled rights.

This is performed by your backup and retention of the databases.

Yes, any copies of the database also carries the indexes and references.

This can be done by any backup of the system, or by the archiving. Using Windows can even have the Indexing Services enabled for searching native formats.

The audit file captures all activity within the system by who, what and when. It does not capture if a note was added to the document for example, but rather that the document was open by a user, and when. It states the type of operation that was performed

Yes, built in, and no user can alter. The audit can be exported for additional sorting etc., and filtering.

We have no problem placing the documentation in Escrow.

Yes, the system has this built in and based on their rights.