

January 23, 2008

P.O. Box 89000
Baltimore, Maryland
21289-4430
4515 Painters Mill Road
Owings Mills, Maryland
21117-4903

VIA FACSIMILE AND MAIL

Martha Coakley, Esq.
Attorney General
Office of the Attorney General
McCormack Building
One Ashburton Place
Boston, MA 02108

Daniel Crane, Director
Massachusetts Office of Consumer Affairs and Business Regulation
Ten Park Plaza, Suite 5170
Boston, MA 02116

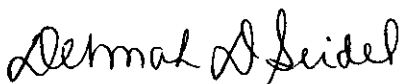
We are writing to inform you that we recently received notification from one of our vendors, CBIZ Benefits & Insurance Services, Inc. ("CBIZ"), that several computers were stolen from its offices in St. Louis, MO between December 24 and 26, 2007. We provide recordkeeping services for retirement plans, such as 401(k) plans, and two of the stolen computers were used by CBIZ to prepare required federal filings for some of our retirement plan clients. As part of the filings, there are schedules that contain specific information on approximately 1,369 plan participants residing in Massachusetts who left their respective companies during the 2005 plan year and certain participants who left in other years. Certain information about such former employees, including their names and Social Security numbers, are believed to be on the unencrypted hard drives of these two stolen computers. The data on such computers did not include addresses or dates of birth.

Although we review the data security practices of vendors that handle customer personal information, we are working with CBIZ and re-examining existing safeguards to determine whether any changes should be made. Additionally, CBIZ promptly reported the theft to its local law enforcement authorities and is cooperating with them in the investigation of this matter.

We are working with our retirement plan clients to mail letters to their participants, including those who are residents of Massachusetts, notifying them of this incident. We began to mail these letters on January 18th. As a precaution, we are offering one year of online credit monitoring at no cost to the participants. The letters also contain all items required under G.L. ch. 93H, plus information regarding the nationwide credit reporting agencies and resources available through the Federal Trade Commission.

If you have any questions, please feel free to call Karen Nash-Goetz, a member of the T. Rowe Price Legal Department at (410) 345-2260 or me at (410) 345-5590.

Sincerely,



Deborah D. Seidel
Manager, Operations Compliance & Risk Management



Front-Office Integration

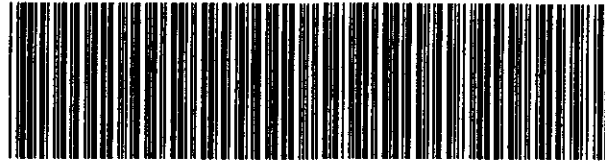
Version 5.23

User: Jeanne Krider
410-345-5177
OM-4405 Retail Ops



Routing Slip - DOMESTIC SHIPMENT - *Route to Mailroom for processing*

Package ID:



* 1 2 3 2 0 0 8 2 3 4 - 4 6 6 - 5 7 8 *

Sender's Information:

Sender's Name: Jeanne Krider
Building/Location: OM-4405
Cost Center: 11433

Phone: 410-345-5177
Department: Retail Ops

Recipient's Information:

Name: Martha Coakley, Esquire
Company: Office of the Attorney
General

Phone #: 617-727-2200
Notification E-Mail: -

Street Address (No PO Boxes): One Ashburton Place
City: Boston

Floor/Room #: McCormack Building
State: MA Zip: 02108

Package Information:

Service Type: FedEx Priority Overnight
Envelope

ShipDate: 1/23/2008

Payment: Sender
Sat. Del.: No Signature Service Type: NULL

Account Number: -

Weight (enter 1 for letter; otherwise leave blank): 1 Declared Value: \$0

[Repeat Shipment](#)

[New Shipment](#)

[Home](#)

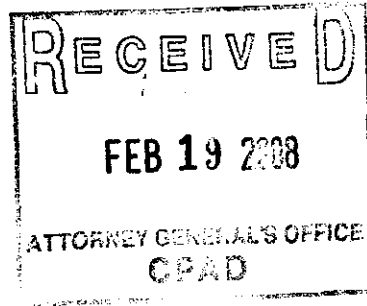
[Logout](#)

This site is protected by copyright and trademark laws under U.S. and International law. All rights reserved. © 1995-2004 Federal Express Corporation.

RECEIVED
JAN 24 2008
OFFICE OF THE ATTORNEY GENERAL
EXECUTIVE RESPONSE UNIT

P.O. Box 89000
Baltimore, Maryland
21289-4430

4515 Painters Mill Road
Owings Mills, Maryland
21117-4903



February 11, 2008

Scott D. Schafer
Assistant Attorney General
Consumer Protection Division
The Commonwealth of Massachusetts
One Ashburton Place
Boston, MA 02108

RE: Security Breach Notification

Dear Mr. Schafer:

Pursuant to your letter of January 31st, enclosed is a sample of the correspondence that was sent out to residents of Massachusetts notifying them of the security breach.

As noted in our initial letter to your office dated January 23rd, we provide recordkeeping services for retirement plans, such as 401(k) plans, and the data related to participants in certain of those retirement plans. One such plan, the Sterling Commerce, Inc. Savings and Security Plan ("Sterling Plan"), asked for minor changes, such as referencing in the first sentence that the notice was being given by T. Rowe Price and Sterling Commerce, Inc. (the sponsor of the Sterling Plan). A sample of that letter, which was sent to the Massachusetts residents at issue for the Sterling Plan, is enclosed for your records as well. Sterling is planning on sending your office a follow-up letter to our initial letter of January 23rd.

If you have any questions, please feel free to call Karen Nash-Goetz, a member of the T Rowe Price Legal Department at (410) 345-2260 or me at (410) 345-5590.

Sincerely,

Deborah D. Seidel
Manager
Operations Compliance & Risk Management

Enclosures

[Date]

[Name]

[Address]

[Address]

Dear [Name]:

We are writing to inform you about an incident that involves personal information about you in connection with the <plan name> ("Plan") that we service. One of our vendors recently informed us that several computers were stolen from its offices between December 24 and 26, 2007, including two computers that were used in preparing required federal reporting for the retirement plan referenced above. In these filings, specific information is provided regarding participants who left the company during the 2005 plan year and certain participants who left in other years. As a former employee, your address, date of birth, or other personally identifiable information was not included in the records. However, your name and Social Security number are believed to be on the hard drives of these stolen computers, along with the amount of your account balance at the end of the 2006 plan year (if any).

The vendor promptly notified law enforcement authorities and continues to cooperate in the investigation. While we, our vendor, and the Plan have security controls in place to protect personal information, we are reviewing this matter and will continue to work with the vendor to enhance security measures. If you have a current balance with the Plan, please be assured that we are taking additional measures to help secure your account.

We deeply regret that this incident occurred and realize that you may have questions and concerns. One step we have taken is to provide you access to a one-year subscription to an online credit monitoring service through TransUnion. We have included an activation code you can use to obtain this service at no cost to you. Your code is <code number>. You may activate your one-year subscription any time between now and April 30, 2008. To access the service, please visit <http://www.truecredit.com/code> and enter your 16-digit code as shown in the gift certificate code boxes. You will then be guided through a series of screens to verify your identity and to access the following features:

- Unlimited access to your TransUnion credit report and credit score;
- Credit monitoring to alert you by e-mail if critical changes (such as address changes, new inquiries, new accounts, etc.) take place on your TransUnion credit report; and
- Up to \$25,000 of identity theft insurance through American International Group, Inc. (coverage not available to New York residents).

We apologize for this unfortunate event and want to reassure you that T. Rowe Price, our vendor, and the Plan take the security of personal information very seriously. If you would like any further information concerning this incident, please contact the Participant Service Center at 1-866-799-0157, Monday-Friday, 7 a.m. to 10 p.m. ET.

Sincerely,

Steven J. Zients, Senior Vice President

See the attached document for additional important information.

Additional Information on Protecting Yourself

There are other steps that you can take to help further protect yourself. Remain vigilant and watch for any unusual activity on your account and credit card statements. You may wish to contact your credit card issuers and financial institutions and inform them of the incident. Promptly report incidents of suspected identity theft or fraud to your local law enforcement agency, your financial institution, and to one of the three nationwide consumer reporting agencies listed below. Other options include:

- Periodically obtaining credit reports from each of the three nationwide credit reporting agencies and have information relating to fraudulent transactions deleted. Under federal law, you are entitled to one free copy of your credit report every 12 months from each of the major credit reporting agencies. You may obtain a free copy of your credit report by going on the Internet to www.AnnualCreditReport.com or by calling 1-877-322-8228. If you would rather write, a request form is available on www.AnnualCreditReport.com. You may want to obtain copies of your credit reports to ensure the accuracy of the report information.
- You may also contact the fraud departments of any of the three major credit reporting agencies. They will discuss your options with you, such as placing a 90-day “fraud alert” in your file or longer-term alerts if fraudulent transactions have occurred. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you. It also may delay your ability to obtain credit. The contact information for each of the three major credit reporting agencies is listed below:

Equifax
P.O. Box 740256
Atlanta, GA 30374
1-800-685-1111

Experian
P.O. Box 1017
Allen, TX 75002
1-888-397-3742

TransUnion
P.O. Box 6790
Fullerton, CA 92834
1-800-680-7289

- The Federal Trade Commission also provides information about these options and additional steps you can take. To learn more, you can go to www.consumer.gov/idtheft or www.ftc.gov/credit, or call 1-877-IDTHEFT (1-877-438-4338). In addition, you may also contact the Federal Trade Commission to report incidents of identity theft.

You have a right under Massachusetts law to obtain a police report, although your opportunity to obtain a report from law enforcement authorities in another jurisdiction may be limited.

In addition, you have a right under Massachusetts law to request a “security freeze” on your credit report. A security freeze will prohibit a credit reporting agency from releasing any information in your credit report without your express authorization. A security freeze must be requested by sending a request either by certified mail, overnight mail, or regular stamped mail to a credit reporting agency, or as authorized by regulation. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift, or remove a security freeze. In other cases, Massachusetts law provides that a credit reporting agency may charge up to \$5 each to place, lift, or remove a security freeze. The law does not address fees that may be charged for other services.

A security freeze is designed to prevent credit, loans, or services from being approved in your name without your consent. You should be aware that using a security freeze may delay, interfere with, or prevent the timely approval of any subsequent request or application you make regarding new loans, credit, mortgage, insurance, government services or payments, rental housing, employment, investment, license, cellular phone, utilities, digital signature, Internet credit card transactions, or other services, including an extension of credit at point-of-sale.

When you place a security freeze on your credit report, within five business days of receiving your request for a security freeze, the credit reporting agency must provide you with a personal identification number or password to use if you choose to remove the freeze on your credit report or to authorize the release of your credit report to a specific party or for a specified period of time after the freeze is in place. To provide that authorization, you must contact the credit reporting agency and provide the following:

1. The personal identification number or password provided by the credit reporting agency;
2. Proper identification to verify your identity; and
3. The third party or parties who are to receive the credit report or the specified period of time for which the report shall be available to authorized users of the credit report.

You can contact the three nationwide credit reporting agencies, as described above.

T. Rowe Price Retirement Plan Services, Inc.

[Date]

[Name]

[Address]

[Address]

P.O. Box 17349
Baltimore, Maryland 21297-1349

4515 Painters Mt. Road
Owings Mills, Maryland 21117-4903

Dear [Name]:

T. Rowe Price and Sterling Commerce, Inc. are providing you this notice about an incident that involves your personal information in connection with the Sterling Commerce, Inc. Savings and Security Plan serviced by T. Rowe Price. A T. Rowe Price vendor recently informed us that several computers were stolen from its offices between December 24 and 26, 2007, including two computers that were used in preparing required federal reporting for your retirement plan (referenced above).

In these filings, specific information is provided regarding participants who left Sterling during the 2005 plan year and certain participants who left in other years. Your address, date of birth, or other personally identifiable information was not included in the records. However, your name and Social Security number are believed to be on the hard drives of these stolen computers, along with the amount of your account balance, if any, at the end of the 2006 plan year.

The vendor promptly notified law enforcement authorities and continues to cooperate in the investigation. While we, our vendor, and the Plan have security controls in place to protect personal information, both T. Rowe Price and Sterling are reviewing this matter and will continue to work together with the vendor to enhance security measures. If you have a current balance with the Plan, please be assured that we are taking additional measures to help secure your account.

We deeply regret that this incident occurred and realize that you may have questions and concerns. One step we have taken is to provide you access to a one-year subscription to an online credit monitoring service through TransUnion. We have included an activation code you can use to obtain this service at no cost to you. Your code is xxxxxxxxxxxxxxxxxx. You may activate your one-year subscription any time between now and April 30, 2008. To access the service, please visit <http://www.truecredit.com/code> and enter your 16-digit code as shown in the gift certificate code boxes. You will then be guided through a series of screens to verify your identity and to access the following features:

- Unlimited access to your TransUnion credit report and credit score;
- Credit monitoring to alert you by e-mail if critical changes (such as address changes, new inquiries, new accounts, etc.) take place on your TransUnion credit report; and
- Up to \$25,000 of identity theft insurance through American International Group, Inc. (coverage not available to New York residents).

We apologize for this unfortunate event and want to reassure you that T. Rowe Price, Sterling Commerce, and the vendor take the security of personal information very seriously. If you would like any further information concerning this incident, please contact the Participant Service Center at 1-866-799-0157, Monday- Friday, 7 a.m. to 10 p.m. ET.

Sincerely,
Steven J. Zients, Senior Vice President



Additional Information on Protecting Yourself

There are other steps that you can take to help further protect yourself. Remain vigilant and watch for any unusual activity on your account and credit card statements. You may wish to contact your credit card issuers and financial institutions and inform them of the incident. Promptly report incidents of suspected identity theft or fraud to your local law enforcement agency, your financial institution, and to one of the three nationwide consumer reporting agencies listed below. Other options include:

- Periodically obtaining credit reports from each of the three nationwide credit reporting agencies and have information relating to fraudulent transactions deleted. Under federal law, you are entitled to one free copy of your credit report every 12 months from each of the major credit reporting agencies. You may obtain a free copy of your credit report by going on the Internet to www.AnnualCreditReport.com or by calling 1-877-322-8228. If you would rather write, a request form is available on www.AnnualCreditReport.com. You may want to obtain copies of your credit reports to ensure the accuracy of the report information.
- You may also contact the fraud departments of any of the three major credit reporting agencies. They will discuss your options with you, such as placing a 90-day "fraud alert" in your file or longer-term alerts if fraudulent transactions have occurred. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you. It also may delay your ability to obtain credit. The contact information for each of the three major credit reporting agencies is listed below:

Equifax	Experian	TransUnion
P.O. Box 740256	P.O. Box 1017	P.O. Box 6790
Atlanta, GA 30374	Allen, TX 75002	Fullerton, CA 92834
1-800-685-1111	1-888-397-3742	1-800-680-7289

- The Federal Trade Commission also provides information about these options and additional steps you can take. To learn more, you can go to www.consumer.gov/idtheft or www.ftc.gov/credit, or call 1-877-IDTHEFT (1-877-438-4338). In addition, you may also contact the Federal Trade Commission to report incidents of identity theft.

You have a right under Massachusetts law to obtain a police report, although your opportunity to obtain a report from law enforcement authorities in another jurisdiction may be limited.

In addition, you have a right under Massachusetts law to request a "security freeze" on your credit report. A security freeze will prohibit a credit reporting agency from releasing any information in your credit report without your express authorization. A security freeze must be requested by sending a request either by certified mail, overnight mail, or regular stamped mail to a credit reporting agency, or as authorized by regulation. If you have been a victim of identity theft, and you provide the credit reporting agency with a valid police report, it cannot charge you to place, lift, or remove a security freeze.

In other cases, Massachusetts law provides that a credit reporting agency may charge up to \$5 each to place, lift, or remove a security freeze. The law does not address fees that may be charged for other services.

A security freeze is designed to prevent credit, loans, or services from being approved in your name without your consent. You should be aware that using a security freeze may delay, interfere with, or prevent the timely approval of any subsequent request or application you make

regarding new loans, credit, mortgage, insurance, government services or payments, rental housing, employment, investment, license, cellular phone, utilities, digital signature, Internet credit card transactions, or other services, including an extension of credit at point-of-sale.

When you place a security freeze on your credit report, within five business days of receiving your request for a security freeze, the credit reporting agency must provide you with a personal identification number or password to use if you choose to remove the freeze on your credit report or to authorize the release of your credit report to a specific party or for a specified period of time after the freeze is in place. To provide that authorization, you must contact the credit reporting agency and provide the following:

1. The personal identification number or password provided by the credit reporting agency;
2. Proper identification to verify your identity; and
3. The third party or parties who are to receive the credit report or the specified period of time for which the report shall be available to authorized users of the credit report.

You can contact the three nationwide credit reporting agencies, as described above.