



April 22, 2008

Martha Coakley, Esq.
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

Re: Notice of Potential Exposure of Personal Identifying Information

This letter is to inform you that we received notification from one of our vendors, USInternetworking, Inc. ("USi"), that a laptop computer was stolen from the home of one of its employees in Columbus, OH on March 23, 2008. Sterling Commerce is a software and services company, and the stolen computer was used by USi in the provision of information technology services in support of Sterling Commerce's benefits administration. The unencrypted hard drive of the computer is believed to have contained personal information on several thousand Sterling Commerce (America), Inc. employees and their dependents, including their name, address, date of birth, Social Security number, and premiums and coverages. Our records indicate that 326 of such employees and their dependents reside in Massachusetts.

USi promptly reported the theft to local law enforcement authorities and is cooperating with them in the investigation of this matter. The computer was password protected. We believe that this theft was a random crime, and have no evidence at this time that the information has been, or will be, used for unauthorized purposes. However, as a precaution, we are notifying affected individuals and the national credit reporting agencies.

Attached is a sample copy of the letter that we began mailing yesterday, April 21, 2008, to affected individuals, including those in Massachusetts, notifying them of this incident. The letters contain all information required under G.L. ch. 93H, plus information regarding nationwide credit reporting agencies and resources available through the Federal Trade Commission. The letters also extend an offer of two years of online credit monitoring at no cost to the impacted individuals.



Sterling Commerce deeply regrets this incident and is working with USi to evaluate current safeguards and determine if additional measures are necessary to avoid future such incidents. Please contact Michael McNew, a member of the Sterling Commerce Legal Department, at (614) 789-5569 should you have any questions.

Sincerely,

Michael A. Meyer
Senior Vice President and General Counsel



Secure Processing Center | 600 Satellite Blvd Suwanee, GA 30024

<FirstName> <MiddleInitial> <LastName> <Suffix>
<Address> (Line 1)
<Address> (Line 2)
<City> <State> <Zip>
<POSTNET BARCODE>

Dear <FirstName> <MiddleInitial> <LastName> <Suffix>,

This letter is to inform you about an incident that may affect you. One of our vendors, USInternetworking, Inc. ("USI"), recently informed us that a computer used by USI in support of Sterling Commerce's benefits administration was stolen from the home of one of its employees on March 23, 2008. This computer contained benefits information of Sterling Commerce employees and their dependents, including your name, address, date of birth, Social Security number, and benefits premiums and coverages.

We have no evidence that this information has been improperly accessed or misused. However, we want to make you aware of the incident and the steps that have been taken to safeguard against any damage that may result from the incident.

USI promptly notified law enforcement authorities of the incident, who are currently investigating. USI also indicates that the computer was password protected. We, as well as USI, are reviewing this incident and working to enhance our security measures already in place to protect personal information.

As an additional safeguard, USI has arranged to provide you with ID TheftSmart™ Continuous Credit Monitoring and Enhanced Identity Theft Restoration from Kroll Inc. at no cost to you for 2 years. ID TheftSmart is one of the most comprehensive programs available to help protect your name and credit against identity theft. Please read about the safeguards now available to you.

If you would like to take advantage of the credit monitoring service, all you have to do is complete and return the enclosed authorization form to begin the process. Your authorization is required to provide the service.

If you have questions regarding the ID TheftSmart service or feel you may have an identity theft issue, please call ID TheftSmart member services at 1-800-588-9839 between 8:00 a.m. and 5:00 p.m. (Central Time), Monday through Friday.

If you have questions regarding the incident, please contact Sterling Commerce's Privacy Office at 1-866-930-1608 between 8:00 a.m. and 5:00 p.m. (Central Time), Monday through Friday.

We sincerely apologize for this incident. You have my assurance that Sterling Commerce takes the security of personal information very seriously.

Sincerely,

Robert D. Irwin
President and Chief Executive Officer

U.S. State Notification Requirements

For residents of Hawaii, Maryland, Michigan, North Carolina, Oregon, Vermont, and Wyoming:

It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity. You may obtain a free copy of your credit report by contacting any one or more of the following national consumer reporting agencies:

Experian
P.O. Box 9554
Allen, TX 75013
www.experian.com

Equifax
P.O. Box 105788
Atlanta, Georgia 30348
www.equifax.com

TransUnion
Fraud Victim Assistance
Department
P.O. Box 6790
Fullerton, CA 92834-6790
www.transunion.com

For residents of Oregon and Maryland:

State laws advise you to report any suspected identity theft to law enforcement, as well as the Federal Trade Commission.

For residents of Maryland:

You can obtain information from the Maryland Office of the Attorney General about steps you can take to avoid identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Avenue, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/bcp/edu/microsites/idtheft/

For residents of Massachusetts:

It is required by state law that you are informed of your right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent; however, using a security freeze may delay your ability to obtain credit.

To place a security freeze on your credit report, you need to send a request to a consumer reporting agency by certified mail, overnight mail, or regular stamped mail. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past two years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The consumer reporting agency may charge a fee of up to \$5.00 to place a freeze or lift or remove a freeze, unless you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency.

Frequently Asked Questions

- Q.** What is identity theft?
- A.** Identity theft is a crime that occurs when someone steals your personal information and uses it to obtain false credit. It often begins with the theft of a Social Security number, credit card number, debit card or phone card.
- Q.** Where does an identity thief get this personal information?
- A.** Identity thieves steal information from a variety of places. They take it from stolen wallets or purses that contain credit and bank cards. Or they help themselves to bank and credit card statements, credit card offers and tax information that's in your own mailbox or trash can. They may even file a "change of address form" in your name and have all your mail sent to another location. Some thieves fraudulently obtain a credit report in your name. Others access personal information you share on the Internet.
- Q.** How do they use the personal information they steal?
- A.** It's common for an identity thief to call your credit card company and ask that the mailing address on your credit card be changed. They run up charges on your account ... and then have the bill sent to another address. Other thieves open new credit card or bank accounts using your name, date of birth and Social Security Number. So when the bills aren't paid or the checks bounce, it's reported on your credit report. Still other thieves use your name and credit to take out loans for which creditors think you're responsible.
- Q.** What should I do if I am a victim of identity theft?
- A.** As a member, all you have to do is make one phone call to the Toll-Free number shown on the enclosed letter. One of the professionals on our staff will provide you with step-by-step assistance.

Your ID TheftSmart Benefits

Comprehensive Fraud Restoration

Let the experts do the work for you

Licensed investigators who truly understand the problems surrounding identity theft will help restore your name and credit for you. We will do most of the work!

Continuous Credit Monitoring

Early detection is key

Monitoring your credit is one of the best ways to help spot identity theft early. You can have your credit file continually monitored for specific activity in your Experian credit file that may alert you to fraud.

If you have questions or feel that you have become a victim of identity theft call the toll-free number shown on the enclosed letter.

Our Licensed investigators are ready to help you.

Restoration Service Exclusions

Your free Enhanced Identity Theft Restoration service is only available for identity theft concerns that are related to the event described in the cover letter included with this benefits guide.

A signed limited power of attorney must be provided to Kroll when an Identity Theft Restoration case is opened in order for Kroll to work on your behalf and/or provide Non-Credit Database Searches.

Any stolen identity event of which a spouse or child participated in, directed or had prior knowledge.

Any dishonest, criminal, malicious or fraudulent acts, if the member(s) that suffered the fraud personally participated in, directed or had knowledge of such acts.

Membership Services do not cover any financial losses attributed to the Stolen Identity Event, including but not limited to, money stolen from a wallet, unauthorized purchases of retail goods or services online, by phone, mail or direct.

Restoration services only apply to identity theft and fraud issues occurring in the domestic United States.

1201100-00-0000

ID TheftSmart

Your Guide to Membership Benefits



Ways We Guard You Against Identity Theft

Your membership with ID TheftSmart™ gives you easy access to the resources you need to fight back if an identity thief threatens your financial standing. Our services are designed to monitor your credit activity and help restore damage to your credit history.

Enhanced Identity Theft Restoration

Let the experts do the work for you

If you have identity theft or fraud issues related to the event discussed in the cover letter included in this packet, you will have access to Enhanced Identity Theft Restoration to help restore your identity to pre-theft status.

You will also be assigned an experienced Licensed Investigator who will work on your behalf to help resolve your identity theft issues.

Your Licensed Investigator will work on your behalf to help address or correct the identity theft issues you have with affected agencies and institutions, including (but not limited to):

- Credit card companies;
- Financial institutions;
- All three credit repositories;
- Federal Trade Commission;
- Social Security administration;
- Department of Motor Vehicles;
- U.S. Postal Service;
- Law enforcement personnel; and
- other organizations that may be affected.

Your Licensed Investigator will also perform non-credit searches of applicable local and national databases. We'll look for additional issues you may not be aware of, including:

- Criminal activity in your name in your county's records, certain national databases and federal watch lists;
- Department of Motor Vehicle records in your state;
- Unknown addresses affiliated with your Social Security Number; and
- Checking account activity in your name reported as fraudulent.

Continuous Credit Monitoring

Early detection is key

A professional thief can assume your identity in just a few hours. But it can take years for you to restore your credit standing. Early detection is key to minimizing the damage caused by thieves who steal your name.

Continuous Credit Monitoring will alert you to specific activity in your Experian credit file that may be associated with fraudulent activity, such as:

- Companies who have received a copy of your credit report;
- New account information;
- Change of address;
- Public records; and
- Derogatory information.

Upon receipt and review of your monitoring alert, if you feel that you have an identity theft issue, our licensed investigators are available to help restore your name and credit.

Your credit monitoring service cannot be provided without your authorization. You must complete and return the enclosed authorization form to begin the process.



Need Assistance? Call the Toll-Free number shown on the enclosed letter.

Privacy Policy

General

Kroll Background America, Inc. ("Kroll") respects your concerns regarding maintaining the privacy of your personal data that is submitted to us. This Privacy Policy covers all the information practices of Kroll and describes the principles Kroll will follow with regard to all information submitted to Kroll in connection with the services we provide. These principles will be implemented by all Kroll personnel regardless of their location. All data shall be collected, stored and used in compliance with the Fair Credit Reporting Act ("FCRA") and other state and federal applicable law. This Privacy Policy applies only to Kroll Background America, Inc. and does not apply to data collected by Kroll Inc. or by any of the subsidiaries of Kroll Inc. other than Kroll Background America, Inc.

Kroll Is Committed to Protecting your Personal Information

Kroll acknowledges both the duty of trust and care in maintaining the privacy of your personal information which we collect and store and our legal obligations as a consumer reporting agency.

- Application Information
- Information From Outside Sources
- Consumer Report Information

Use and Transfer of Information

Kroll is provided with personal information in connection with preparing a report for you. In connection with our providing these services, Kroll may, in some instances, employ other companies and individuals, as our subcontractors, to perform functions on our behalf. All such contractors are contractually obligated to use and maintain the confidentiality of personal information in a manner consistent with this Privacy Policy. These companies may not share any such information with any third party. Except as described in this Privacy Policy, we will not use or otherwise disclose any of the personal data that you provide or that we collect from third parties or other sources.

Confidentiality

Kroll will use our best efforts to insure that no unauthorized parties have access to any of your information. We will never sell or provide your personal data to a third party, except as stated in this Privacy Policy, without your express consent. We may, however, disclose personal data in response to a court order or other legal obligation.

Accuracy

Kroll makes every effort to ensure that the data we receive, collect, and store about you is as accurate as possible. However, Kroll does not vouch for, and is not responsible for, incomplete, inaccurate or not current data about you that may be supplied to Kroll by a third-party source.

Access

You have the right to access any reports Kroll produces and maintains about you. You may contact Kroll at any time to determine whether we hold any personal information about you and to obtain access to that information. We will only afford you access to your data upon proof of identification that you are the individual who is entitled to request access. We will mail a copy of such information within 7 days as mandated by the FCRA.

Security

Protecting your confidential information is our business; therefore, Kroll takes all appropriate measures to assure the security of your personal data. Kroll uses advanced encryption technology – 128-bit Secure Socket Layer (SSL) - to keep personal information and data secure from unauthorized access. All data is stored on our servers in a secure, encrypted manner. Access to those servers is strictly limited to network administrators and other authorized personnel of Kroll, who have been trained to protect against loss, misuse, unauthorized access, disclosure, alteration or destruction of personal data under Kroll's control. We take pride in our technology and our security policies.

Kroll is a member of the Better Business Bureau and the Better Business Bureau Online Privacy Seal Program. The Better Business Bureau is available for resolving disputes between you and Kroll. To file a complaint with respect to the privacy practices of Kroll, you may visit the Better Business Bureau web site at www.bbbonline.com

KROLL

Know Your Rights

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. For more information, including information about additional rights, go to www.ftc.gov/credit or write to: Consumer Response Center, Room 130-A, Federal Trade Commission, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580.

You must be told if information in your file has been used against you. Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment — or to take another adverse action against you — must tell you, and must give you the name, address, and phone number of the agency that provided the information.

You have the right to know what is in your file. You may request and obtain all the information about you in the files of a consumer reporting agency (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:

- a person has taken adverse action against you because of information in your credit report;
- you are the victim of identity theft and place a fraud alert in your file;
- your file contains inaccurate information as a result of fraud;
- you are on public assistance;
- you are unemployed but expect to apply for employment within 60 days.

In addition, as of September 2005 all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See www.ftc.gov/credit for additional information.

You have the right to ask for a credit score. Credit scores are numerical summaries of your credit worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See www.ftc.gov/credit for an explanation of dispute procedures.

Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information. Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.

Consumer reporting agencies may not report outdated negative information. In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.

Access to your file is limited. A consumer reporting agency may provide information about you only to people with a valid need — usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.

You must give your consent for reports to be provided to employers. A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.ftc.gov/credit.

You may limit "prescreened" offers of credit and insurance you get based on information in your credit report. Unsolicited "prescreened" offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt-out with the nationwide credit bureaus at 1-888-5-OPTOUT (1-888-567-8688).

You may seek damages from violators. If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.

Identify theft victims and active duty military personnel have additional rights. For more information, visit www.ftc.gov/credit.

Para información en español, visite www.ftc.gov/credit o escriba a la FTC Consumer Response Center, Room 130-A, 600 Pennsylvania Ave. N.W., Washington, D.C. 20580

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. Federal enforcers are:

Type of Business:	Contact:
Consumer reporting agencies, creditors and others not listed below	Federal Trade Commission: Consumer Response Center – FCRA, Washington, DC 20580 877-382-4357
National banks, federal branches/agencies of foreign banks (word "National" or initials "N.A." appear in or after bank's name)	Office of the Comptroller of the Currency, Compliance Management, Mail Stop 6-6, Washington, DC 20219 800-613-6743
Federal Reserve System member banks (except national banks, and federal branches/agencies of foreign banks)	Federal Reserve Board, Division of Consumer & Community Affairs, Washington, DC 20551 202-452-3693
Savings associations and federally chartered savings banks (word "Federal" or initials "F.S.B." appear in federal institution's name)	Office of Thrift Supervision, Consumer Complaints, Washington, DC 20552 800-842-6929
Federal credit unions (words "Federal Credit Union" appear in institution's name)	National Credit Union Administration, 1775 Duke Street, Alexandria, VA 22314 703-519-4600
State-chartered banks that are not members of the Federal Reserve System	Federal Deposit Insurance Corporation, Consumer Response Center, 2345 Grand Avenue, Suite 100, Kansas City, Missouri 64108-2638 877-275-3342
Air, surface, or rail common carriers regulated by former Civil Aeronautics Board or Interstate Commerce Commission	Department of Transportation, Office of Financial Management, Washington, DC 20590 202-366-1306
Activities subject to the Packers and Stockyards Act of 1921	Department of Agriculture, Office of Deputy Administrator – GIPSA, Washington, DC 20250 202-720-7051