

FINANCIAL INFORMATION FORUM

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New York, New York 10004

212-422-8568

November 18, 2010

GETS Program Manager
National Communications System
Department of Homeland Security
245 Murray Lane, Mail Stop 0615
Washington, DC 20598-0615

Re: Government Emergency Telecommunications Service (GETS) Cards for Service Bureaus and Market Data Vendors

Dear Sir or Madam,

The Financial Information Forum (FIF)¹ would like to take this opportunity to request GETS participation for the leading service bureaus and market data vendors² that support trading in U.S. financial markets. The FIF, through the FIF Business Continuity Planning (BCP) Committee coordinates market data and service bureau involvement in industry business continuity and disaster recovery efforts, maintaining an emergency command center focused on resumption of market data service in the event of an emergency. As the association representing market data and service bureau members on the Financial Services Sector Coordinating Council (FSSCC), we are committed to strengthening the resiliency of the financial markets.

It is our understanding that the GETS program is offered to private sector entities through the National Communication System (NCS). The GETS eligibility criteria³ outlines five broad categories serving as guidelines for determining eligibility for GETS. The Public Welfare and Maintenance of National Economic Posture category is described as follows: This user type performs NS/EP functions necessary for maintaining the public welfare and national economic posture during any national or regional emergency. These user functions may include the following:

¹ FIF (www.fif.com) was formed in 1996 to provide a centralized source of information on the implementation issues that impact the financial technology industry across the order lifecycle. Our participants include trading and back office service bureaus, broker-dealers, market data vendors and exchanges. Through topic-oriented working groups, FIF participants focus on critical issues and productive solutions to technology developments, regulatory initiatives, and other industry changes.

² Market Data Vendor members of FIF include Thomson Reuters, Bloomberg, Interactive Data and SIX Telekurs. FIF Service Bureau participants include Broadridge BPS, ICI and SIS, SunGard Brokerage & Clearance, Thomson Reuters BETA and Fidessa.

³ See GETS eligibility criteria at <http://gets.ncs.gov/eligibility.html>

1. Distribution of food and other essential supplies
- 2. Maintenance of national monetary, credit, and financial systems**
3. Maintenance of price, wage, rent, and salary stabilization, and consumer rationing programs
4. Control of production and distribution of strategic materials and energy supplies
5. Prevention and control of environmental hazards or damage
6. Transportation to accomplish the foregoing NS/EP functions

Given the vital role of market data vendors and service bureaus in the maintenance of national financial systems, we believe these firms meet the GETS eligibility requirements established by NCS.

Previously, FIF has sought access to the GETS program for its members through the FBIIC. According to their sponsorship policy:

The FBIIC agencies have determined that to qualify for GETS sponsorship, organizations must support the performance of NS/EP functions necessary to maintain the national economic posture during any national or regional emergency. In particular, the FBIIC agencies view maintenance of the national or regional economic posture as the minimization of systemic disruption to the financial system directly related to the operation of critical financial markets and related essential services and systems.

Essential services and systems are those that have no easily accessible substitute and that are necessary to support one of three critical NS/EP functions in key financial markets and payment mechanisms: (1) necessary crisis response and coordination activities in your region or community; (2) resumption and maintenance of economic activity in your region or community; and (3) the orderly completion of outstanding financial transactions and necessary offsetting transactions that must be completed to avoid a major impact to the regional economic stability. Essential services and systems include: critical funds transfers systems (wholesale/large-value payment systems); securities and derivatives clearing and settlement systems; supporting communication systems and service providers; and key financial market trading systems and exchanges.

While market data vendors and service bureaus provide essential services and systems required for the completion of financial transactions they are not directly regulated by a governmental agency and thus are not qualified for sponsorship under FBIIC.

It is our hope that we can include our members in the GETS cards program by applying directly to NCS. The following appendix provides additional details on the essential services provided by market data vendors and service bureaus in trading and settlement. Please contact me at 312 953 9228 if you have any questions and to discuss next steps.

Regards,



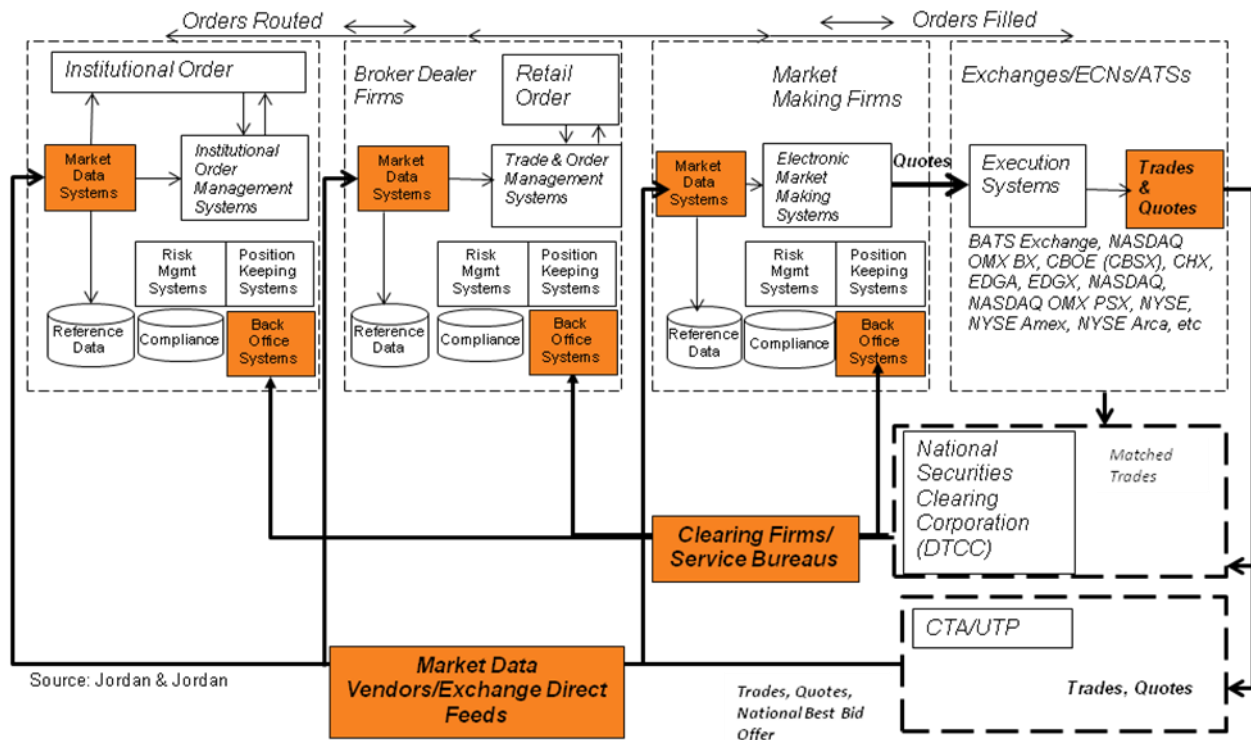
Manisha Kimmel
Executive Director
Financial Information Forum

APPENDIX: Market Data Vendor & Service Bureau Role in Maintenance of National Economic Posture

Market Data Vendors

Market data vendors provide real-time information about the various markets and the changes that take place which drives trading of the U.S. equities, options and fixed income markets. They process and distribute financial information for investment advisory services, fund administration, portfolio management, financial analysis and securities administration. The range of products include solutions for pre-trade decision support through post-trade processing as well as the infrastructure necessary to deliver core applications. Financial market data found on the internet for the individual investor is also supplied by market data vendors. The market data distribution platforms are designed to manage massive amounts of data and transport them from the financial markets to the end user. The same data is maintained for daily trading, accounting, settlement, risk management and reporting to regulators and investors⁴. The figure below highlights the market data and service bureau involvement in the order and trade lifecycle.

US Equity Securities Flow



⁴ See Thomson Reuters 2010 FactBook containing detailed information about their financial market offerings at http://media.thomson.com.edgesuite.net/Public/PDF/IR/IR_FactBook2010.pdf

Service Bureaus

Service Bureaus provide investor communication solutions, securities processing and operations outsourcing solutions and their clients include retail and institutional brokerage firms, global banks, mutual funds, annuity companies, institutional investors, specialty trading firms and clearing firms. Their mission is to drive the industry they serve to higher levels of efficiency and compliance; to partner with financial institutions and public companies to enable their growth; and to provide innovative outsourcing solutions for mission-critical activities. Their offerings include global banks, retail, institutional and discount brokerage firms, correspondent clearing firms, mutual and hedge funds, investment firms, public corporations and other institutions a wide range of cost-effective and scalable multi-currency processing solutions. These systems support the accounting and management of trillions of dollars in invested assets and process millions of trades each day.⁵

⁵ In fiscal year 2010, Broadridge Financial Solutions (an FIF service bureau member) processed on average over 1.5 million equity trades per day and over \$3.5 trillion in fixed income trades per day of U.S. and Canadian securities and provided fixed income trade processing services to 10 of the 18 primary dealers of fixed income securities in the U.S. See Broadridge Financial Solutions Form 10-K at <http://www.broadridge-ir.com/fin/10k/br10k10.htm>