



Premiere Global Services Resilience, Security & Continuity Resources

An overview of Premiere Global Services commitment to system integrity and business continuity

Version 03.2

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Purpose Statement

The following document was developed to provide information sought by our customers on compliance issues related to various State/Federal regulations including SAS70 standards, Sarbanes-Oxley, Gramm-Leach-Bliley (GLB), and Health Insurance Portability and Accountability Act (HIPAA). The document shows how Premiere Global Services complete product-line; delivery mechanisms and organizational resources at the New Jersey facility and Virginia co-location facility combine to meet our customer's daily time-sensitive messaging needs. The document explores compliance-required elements of procedural initiatives, design consistency, delivery, and architectural and safeguard conditioning. It also includes information about Premiere Global Services disaster recovery preparations and emphasizes Premiere Global Services commitment to security, privacy and high-quality service.

Please note that any supplier and/or product mentioned below should not be construed as Premiere Global Services recommendation or endorsement.

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1. The Company & Its Commitments

1.1 Company Overview

Founded in 1988, Premiere Global Services Inc., (PGS) formerly known as Xpedite, is a global provider of integrated data messaging services that drive business communications. The data communications segment of Premiere Global Services, Inc (NYSE: PGI), has an unparalleled track record for messaging innovation, providing dynamic outsourced solutions to almost every industry sector.

Premiere Global Services is headquartered in Atlanta, Georgia, and processes 3 billion e-mail, fax, voice and SMS messages annually for over 18,000 customers, including half of the global Fortune 500. These customers, many in the highly regulated and performance-demanding global financial community, know that when service and dependability are required, Premiere Global Services is the answer. No other business communications company has the breadth of product offerings, expansive feature-set, customization capabilities and service capacity of the industry's acknowledged leader. The wide varieties of business solutions provided by Premiere Global Services are delivered with superior customer care by over 1,100 personnel based in 80 offices throughout the world. This combination of leading edge products, unsurpassed support, and stringent security policies enables Premiere Global Services to fully meet the changing needs of our customers.

At Premiere Global Services, customer care means continuously meeting customer's requirements for quality service, product integrity, confidentiality and timely service delivery. Premiere Global Services achieves these goals through management-supported programs for architectural and design consistency, controlled and monitored performance, plus appropriate protective safeguards and redundancy provisioning. All Premiere Global Services associates are committed to these programs and strive to improve our service profile daily, through conscientious professional service and dealings with our customers and third-party service providers.

1.2 Solution Offerings

Premiere Global Services operates the world's largest private IP-based messaging network. With a suite of innovative solutions, Premiere Global Services has captured a substantial share of the data messaging market.

Premiere Global Services solutions include:

Solution	Features
Documanager	Send, receive, store and forward faxes right from your email inbox, wherever you are. Documanager improves efficiency and privacy, reduces operating costs and eliminates the need for fax machines.
Campaign Management	Create an ongoing dialog with customers, track Web page visits, add dynamic content at any time, and analyze buying patterns with this advanced eMarketing solution.
eStatements	Reduce the cost of document generation and improve customer service with presentment of customer statements on the Web or via secure encrypted email.
eInvoicing	This b-to-b solution offers Web presentment of invoices, dispute resolution capabilities and convenient payment options.
Collections / Donations	Contact donors or debt holders quickly and efficiently while lowering operational costs.
Alerts & Notifications	Immediately provide critical information to thousands of stakeholders with unprecedented speed and impact.
Multi-Modal Broadcast	Whether you use email, fax, voice or SMS to communicate with target audiences, our broadcast solutions will speed and simplify the entire process.

1.3 Mission Statement

Premiere Global Services believes dependable quality service is of paramount importance in retaining and acquiring new customers. Premiere Global Services on-going mission is to exceed our customer's needs by setting the industry's standard for excellence in product performance and customer care. Our operational philosophy is to never be satisfied with 'where we are now.' Instead, we strive to improve our products and support environment. Premiere Global Services only provides services supported by superior quality software, top-shelf computing, and networking and communications resources. Premiere Global Services is strengthened by our dedicated associates whose goals are to achieve ever-higher degrees of accommodating support, product quality, integrity and recoverability for the ultimate benefit of our company and our customers.

1.4 Company Commitments

Premiere Global Services product and service resiliency is built on its long history as the world's principal provider of business communication services and the company's commitment to customer care.

1.4.1 Standards Development

Premiere Global Services mission statement is supported by quality and performance related policies and standards. All technical associates are encouraged to actively participate in the creation and maintenance of Premiere Global Services standards. Our standards manual includes specifics for account management, server hardening, change control and data backup, as well as vendor-specific exposure restrictions. These initiatives have allowed Premiere Global Services to continuously be certified as a European Union (EU) Safe Harbor vendor.

As part of our standards development policy, Premiere Global Services technical associates are expected to remain current on industry trends and security professionals are encouraged to develop their professional certifications (e.g., CISSP). A current list of our staff certifications is available upon request.

Premiere Global Services is proud of its strong security management policies and constantly strives to improve its network and facilities. These efforts ensure Premiere Global Services continued industry leadership by raising our quality, availability and recovery capabilities beyond the reach of all messaging competitors. Most importantly, these changes improve our customers' ability to meet their business communications needs for years to come.

1.4.2 Commitment to Service

Premiere Global Services employs many measures to ensure high availability of its varied customer message-delivery services. For example, alternate facilities are equipped to provide operation continuation should the delivering facility become unavailable, as in the case of a natural disaster. This commitment to availability is an integral part of the Premiere Global Services customer care mission.

To facilitate rapid issue resolution should problems arise, Premiere Global Services provides 24x7 expert toll-free phone support for its complete product-line, 365 days a year. Our multi-tier support professionals have extensive backgrounds in customer communications as well as hardware and software connection issues. In addition, they are fully trained on Premiere Global Services applications before directly dealing with customers. On-line procedures and historical references aid our support team to quickly identify problem sources and appropriate issue resolution.

The support team also includes Systems Developers and Systems Administrators to address more complex customer and technical service issues. Premiere Global Services customer care commitments ensure the fastest possible resolution of customer issues for continued service availability.

1.4.3 Audit Compliance Support

Premiere Global Services recognizes that our customers may wish to obtain documentation in their efforts to achieve auditory compliance certification. Premiere Global Services will support our customers by providing access to PGS facilities for operational assessments and appropriate documentation on our policies, controls and procedures for key operational processes such as service solutions, customer service, and physical security.

1.4.4 Solutions Success

Premiere Global Services on-going efforts to improve solution offerings and delivery has resulted in recognition as a world-class solution provider.

1.4.4.1 Worldwide Recognition

In a study entitled "Worldwide Facsimile Service Market Review and Forecast, 1998-2003", market research firm IDC recognized Premiere Global Services, (formerly known as Premiere Global Services) as having the largest share in the market for worldwide electronic document distribution over competitors such as AT&T. As a leader in outsourced multimedia messaging, Premiere Global Services has specifically designed solutions to match business applications across virtually all industries.

1.4.4.2 Awards

Premiere Global Services continues to receive recognition for its superior solution offerings:

- IDC's Worldwide Facsimile Service Market Review and Forecast, 1998-2003: Identified Premiere Global Services as the worldwide leader in fax broadcasting
- Kauffman Group: Named Premiere Global Services as the leader in managed information distribution
- 1997 Analyst's Choice Award: "Most Innovative Fax Service" from Davidson Consulting
- 1997 FaxWorld Award: "Best Fax on Demand (FOD) Application"
- Deloitte & Touche's "1997 Technology Fast 500"

2. System Security & Integrity

System security is comprised of procedural and technical safeguards to protect against unauthorized access to Premiere Global Services facilities and system data.

2.1 Physical Security

To ensure a secure physical environment, Premiere Global Services limits all facility access and utilization based on business needs in accordance with job responsibilities. Each employee's role is evaluated before access levels are assigned. Specific customer data areas, applications and locations are included in the authorization.

All areas deemed to contain sensitive data, or where sensitive cluster operations occur, are locked. At the New Jersey facility, an assigned card-key is required for access. In addition, the Data Center is staffed 24x7 by Premiere Global Services professionals who are charged with monitoring the facility. This staff follows established operating guidelines that define procedures for handling expected and problematic conditions, recording environmental issues and other events in logs and turnover journals, and alerting the appropriate people of suspicious activity when necessary.

Non-operational staff may only access the Data Center with an approved escort. Contractors and third-parties may be approved for access to Premiere Global Services areas/systems for business reasons, limited to the time required to accomplish defined and approved tasks. Upon completion, access to all PGS resources is revoked.

Access is monitored through several levels of auditing and logging, and alert tools keep management aware of violations or exceptions.

All access points at the Virginia facility are controlled with biometric hand readers. The Virginia facility offers the additional security measure of locating servers and networking operations in private or shared caged areas. In shared cage situations, visitors are escorted to their area. Cage access histories are recorded and available for review. In addition, customer equipment racks/cabinets within the cages have self-powered locks with a numbered keypad to restrict access.

All areas of the Virginia facility are monitored by 24-hour security officers and visitors are required to produce a valid government-issued picture ID. The entire facility is covered and recorded by CCTV, which is integrated with the access control and alarm system. All exterior entrances are protected by silent alarm and automatic notification of law officials.

The exterior of each facility is fully anonymous with no signage.

2.2 Data Security

Premiere Global Services employs a robust security infrastructure to maintain the confidence of customers and to address regulatory requirements imposed on Premiere Global Services as a public entity, as well as those requirements imposed on our customers. The security infrastructure is viewed by Premiere Global Services as a competitive business asset that delivers value to our customers.

2.2.1 Security Infrastructure

Premiere Global Services maintains multiple layers of hardware and logical access controls to protect environmental integrity and the confidentiality of resident customer data. The security staff has developed a platform that is adaptable to the internal and external requirements. Components of the infrastructure include:

Component	Features
Firewalls	Manages Internet access using port and rule-based controls. Clients are further segmented by individual extranets.
Intrusion Detection Systems (IDS)	Used both at the network and system level to monitor and prevent unwanted activity.
ID Management Solution	LDAP /Kerberos-based for authentication to production systems.
Network Vulnerability Scans	Performed twice a year by two different parties. Vulnerabilities are analyzed then remedied.
Anti-Virus	Performed by McAfee.
Log Analytics / Monitoring	Handled by a combination of Micromuse Netcool, HP Openview and an application developed in-house to monitor application performance and availability.
Transaction Security	Uses encryption when needed.
Database Protection	Managed on a customer need basis with AES storage encryption services.

2.2.2 Data Access Controls

Premiere Global Services employs a formal procedure for granting, modifying and revoking access to all PGS information, systems and networks.

2.2.2.1 Internal Access Control

Authorization and access to all Premiere Global Services system utilities is based on business need in accordance with job duties and responsibilities. Premiere Global Services provides accounts, User IDs, passwords, and encryption characters to approved users.

Contractors and third-parties (e.g., external service providers) may access Premiere Global Services information systems based on business requirements and subject to Premiere Global Services management approval. When approved, access to Premiere Global Services communication and information systems is granted only for the time required to accomplish defined and approved tasks. Such users must sign a non-disclosure of information statement at the beginning of their contract.

All users are responsible for maintaining the security of their account and password. Access shall be immediately revoked whenever a user changes his/her job function or ends their relationship with Premiere Global Services.

Access privileges and account activity is regularly reviewed for unusual account behavior. Premiere Global Services explicitly prohibits unauthorized access, disclosure, duplication, modification, diversion, destruction, loss, misuse, or theft of its information and information resources. All users granted access must abide by Premiere Global Services information security policies and procedures.

2.2.2.2 External Access Control

Remote access to Premiere Global Services internal network by authorized users (e.g., staff working remotely, customers) also requires User IDs and passwords. Access is granted through a centrally managed virtual private network (VPN) that provides encryption and secure authentication. Systems that contain strictly confidential company and client data is available remotely only after an explicit request is made and approved by the data owner or originator, and is subject to the provisions outlined in Premiere Global Services data classification policy. Remote access privileges are always subject to review and may be revoked.

There is no direct access to Premiere Global Services core systems by external users. External controls include our Firewall Demilitarized Zone (DMZ) to limit the sources and types of traffic permitted. The DMZ utilizes monitored network-based IDS as an alert mechanism. Restricted external access is allowed via customized access gateways for data transmission using Verisign web-based SSL public-key encryption or customer-requested hardware VPN's over data-acquisition/distribution.

Customers accessing Premiere Global Services network are limited through the application to view only their data. Within the customer IDs, they are allowed to further segment rights for their own employees. There are some application-to-application integrations that allow queries and updates to Premiere Global Services systems. These applications are authenticated through a combination of ID and SFTP authorization.

2.2.3 Security Audits

2.2.3.1 Penetration Audits

Periodically, Premiere Global Services contracts third-party auditors to test Premiere Global Services remotely accessible paths to its external network to identify possible exposures. The results are reported back to management and Premiere Global Services closes any new or evolving threats, enabling us to continue meeting our commitment to trustworthy services.

Premiere Global Services has contracted Ernst & Young, TrustWave, and Greenwich Technology Partners Inc. (GTP), all leading network infrastructure-consulting firms, to perform such audits. Industry accepted network

testing tools and manual penetration techniques are used to assess the protection surrounding Premiere Global Services Internet facing resources. These tests try to discover unnecessary exposures by challenging deployed controls with probes common in today's inter-connected world. Results of these tests have given Premiere Global Services medium-to-low threat ratings on a risk exposure scale. Such a rating puts Premiere Global Services on par with peer service providers. Premiere Global Services has followed up on the audit results by resolving virtually every minor issue reported.

2.2.3.2 User Audits

All Premiere Global Services system users are authenticated and identified prior to access, and a record of user activity is maintained so that users can be held accountable for their actions. This log of activity, or "audit trail," records system and application processes as well as user activity of systems and applications.

Additional logs are kept of key system activities, such as User ID creation or deletion, and suspicious or anomalous activity which might be an indication of unauthorized usage.

2.2.3.3 System Audits

Premiere Global Services systems are audited on a regular basis. At a minimum, the audit process includes consideration of defined configuration parameters, enabled services, permitted connectivity, current administrative practices, and adequacy of the deployed security measures.

Audits also include the regular use of vulnerability analysis software. Audits are performed by technical personnel other than those responsible for the administration of the systems.

Specific types of transactions, such as financial, require additional data security measures that should be assessed by a professional organization. In 2004, Premiere Global Services contracted with TrustWave to perform a TrustKeeper Payment Industry Compliance (TPIC) assessment to determine if their facilities comply with the major Card Associations' published security guidelines and requirements. The TPIC assessment focused solely on the security of Cardholder data, whether Premiere Global Services has implemented information security policies and processes, and if the security measures are adequate to comply with the various card industry requirements to protect Cardholder data.

The initial review, performed in 2nd quarter 2004, identified specific 'Required for Compliance' areas for improvement. By the beginning of the 3rd quarter, each of these categories had been clarified and, where necessary, improved. Premiere Global Services is now certified as compliant with the TPIC and Cardholder Information Security Program (CISP).

2.2.4 Employee Confidentiality

Trustworthy employees are critical to the security of a successful operation. Premiere Global Services has instituted the following procedures to mitigate risk created by employees who have access to confidential customer data:

- Upon hiring, all Premiere Global Services employees are subjected to a background check to uncover possible vulnerabilities or past acts that are unacceptable.
- All Premiere Global Services employees receive employee handbooks which include details on their handling of all sensitive information. The booklet instructs associates to avoid misusing or disclosing any customer data. Our employees are required to sign an acceptance statement and honor that standard as a condition of continued employment. This message is periodically reissued to promote awareness among staff, consultants and other necessary third-parties.
- Internal processes are in place to ensure that proper data handling methods are observed. Sanctions include reprimands and dismissal.

Consistent compliance of all policies is essential to successful implementation. All Premiere Global Services employees and affiliated third-parties are expected to conform. Non-compliance of employees with any of the

provisions set forth, either willfully or through neglect, could be categorized as misconduct and subject to disciplinary actions.

Non-compliance by consultants or third-parties will result in removal of access by the external service provider to Premiere Global Services computer and communication systems, and may also result in termination of any existing contracts.

2.3 Risk Management

Premiere Global Services constantly evaluates various risk scenarios that could impact the system infrastructure, impeding operations and standards compliance. Management actively promotes programs for ongoing risk assessment and reduction, and supports the development and maintenance of necessary procedures and product standards needed to keep current with evolving issues. Reasonably foreseeable events are vetted by a series of design review forums, security evaluations and scans. All change management processes are reviewed by the Security Manager to ensure that security and contingency considerations are addressed. Resulting action items are implemented through internal / external access controls and security infrastructure.

For more information on risk assessment and prevention, refer to section 4, **‘Disaster Recovery.’**

3. System Reliability

Premiere Global Services is proud to offer customers near 100% uptime of its message-delivery services. Specific uptime varies based on the system or service. System reliability is crucial in achieving this uptime.

Premiere Global Services employs many measures to minimize the likelihood of system failures, including maintaining an active risk assessment program, implementing security actions to minimize threats, utilizing fault-tolerant and failover facilities within its computer and network infrastructure, ensuring its people and software are technically up to date and utilizing technical and management controls to improve availability.

The following measures are employed to ensure system reliability.

3.1 System Redundancy & Availability

One of Premiere Global Services greatest strengths is its site diversity and global presence. Each Premiere Global Services owned site operates with identical product code on similar commercial hardware and operating system software. Premiere Global Services adds the protective measure of provisioning redundant facilities with reserve processing capacities, including local and off-premises backups of essential information. Most importantly, each site is staffed with people specifically trained on PGS procedures, including the deployment and running of the common suite. This arrangement allows operations at one facility to be handled at an alternate facility in times of crisis.

Recovery issues addressed within Premiere Global Services recovery initiatives include:

Initiative	Details
Recovery Strategy	Premiere Global Services is prepared to switch to any or all of its other sites across the world to maintain contracted Quality of Service (QOS) levels. Our diverse sites essentially constitute multiple Warm Recovery capabilities for any Premiere Global Services site, requiring only the transport and restoration of customer data. Immediately following disaster declaration, the covering site's experienced personnel will start expanding and repositioning resources to meet the customer needs they are assigned to cover.
Sites	Premiere Global Services global network of processing centers are field-tested and scalable. Once the necessary customer backup data and new supplies of transactional information are received, these sites can continue to meet current client requirements while preparing for additional responsibility. Premiere Global Services sites are designed to rapidly expand to use

Initiative	Details
	its additional resource capacities to handle further requirements.
Action Plan	Premiere Global Services will first contact clients with contracted quality of service (QOS) level agreements to discuss the details of resuming services out of alternate company facilities. The company will initiate the transfer of necessary information to these sites and help them make necessary communication connections, etc. After ensuring all QOS customers are successfully provided essential services from alternate facilities, other customers will be contacted and offered similar capabilities. After our initial recovery phase, service levels would gradually increase as added hardware and networking capacities come online to return service capacity to 100%.
Delivery	Premiere Global Services shares its 25,000 Fax/Voice delivery points between our multiple processing sites. These multi-homed resources therefore provide Premiere Global Services with truly identical delivery capabilities, regardless of the site servicing a customer.
Operational Support	Since Premiere Global Services utilizes a common code and procedure suite across all of its sites, each site has essentially interchangeable employees – although volume/capacity differences exist. To ensure a covering site has sufficient qualified personnel, some employees from an effected site may travel to the covering locations to aid in the recovery effort. In other cases, some employees (e.g., Customer Care and back-office staff) will set-up operation in local shell facilities and resume operations as much as possible. Due to phone switching capabilities, these people could be contacted using their personal phone number and email address. They will also be charged with the task of ultimate local site restoration.
Recovery & Rebuilding Considerations	In addition to the above recovery planning initiatives, Premiere Global Services has ample insurance and the financial backing of its corporate office, to help the company with the added expenses of responding to, and recovering from, any major processing site disaster. The company also maintains quality-volume relationships with most of its vendors for 'first-off the line' replacement equipment as well as premium-level support agreements to cover additional help as required.
Future DR Initiatives	Premiere Global Services is preparing to deploy a mirrored imaged version of its New Jersey primary data center at our overseas primary data center located in the UK. In addition, expand the deployment of its messaging systems at an independent third party hosting facility. This hardened facility will offer Premiere Global Services a single highly secure site for remote failover for all Premiere Global Services sites and reduce excess capacity waste. This site will also provide the company, in some limited critical cases, a truly mirrored hot-swappable recovery resource for our real-time processing clients. In conjunction with this effort, other hardening and procedural initiatives will provide even better protection of the resiliency and recoverability of the services on which our customers depend on.

3.1.1 Design Overview

Premiere Global Services Document Delivery System (XDDS) is a common platform for our world-class MessageReach, VoiceReach, FaxREACH and SMSReach (wireless) delivery offerings. The entire product suite is created and deployed for highest product integrity and availability, with group reviews of functional specifications and architectural flows. Our design philosophy is based on a structured object-oriented approach that permits broad code-reuse and expansive hardware independence. Internal design requirements include provisions for appropriate content validation and error handling, message retransmissions and extensive service failover capabilities.

Premiere Global Services code is developed almost exclusively in ANSI-C++ to permit access to customer data stored in protected Sybase and Premiere Global Services proprietary file system areas, under generally accepted industry and Premiere Global Services standard extensions. Broad developmental code reviews, comprehensive testing, and QA approval are mandatory before any software touches customer production user information. Version control is administered with RCS and MS-Secure Safe. Since the architecture requires that identical approved code run on multiple hardware configurations, Premiere Global Services can quickly

scale its deployments around the world for current customer volume and utilize non-production resources for emergency recovery needs.

3.1.2 Supporting Architecture

Premiere Global Services has been able to achieve very high system availability by relying on state of the art components, failover capabilities and contingent configurations. Premiere Global Services relies on hardware products from premier providers such as Sun, IBM, Veritas, Legato, Cisco, Checkpoint, and Netscreen. The company makes every effort to evaluate and reasonably address potential issues inherent in all deployed processing and networking gear by reviewing vendor configuration recommendations for security and problem reduction, including the timely implementation of recommended patches. Contingency plans include architectural mandates to eliminate single points-of-failure as appropriate using such measures as clustered processing capabilities, diverse access and delivery paths, available load-balancing/failover products, storage mirroring, disk-striping and extensive backup methodologies, to ensure services continue in the event of product failures. While production malfunctions normally failover to alternate resource or capacity, Premiere Global Services makes use of 'Sun Platinum' class service agreements on its production resources for the fastest vendor support and/or product-replacement. This ensures that the computing environment remain fully serviceable and redundant.

Premiere Global Services central-site production XDDS delivery system code runs on server-sets referred to as Message Control Processors (MCP's). As the heartbeat and brains behind our system, Premiere Global Services run these critical XDDS components on multiple pairs of clustered high-end Sun multi-processor E220 to E420 class machines. The MCP's distribute the message formatting and addressing (raster and parser) work onto groups of mid-range Netra-T and Ultra hardware clusters, before transferring the actual traffic delivery (Email, Fax, etc.) task to local and remotely deployed Sun Netra-T1 and Ultra class machines. Premiere Global Services utilizes proprietary file repositories to hold customer messaging and reporting data during the entire assembly and delivery process. That file system resides on Veritas, RAID5, and Disk striped/mirrored storage units. Premiere Global Services also uses redundant Sybase Replication server repositories for other customer and User ID databases with similar protective storage configurations.

Network Internet access integrity is ensured with multiple diverse T3 access-channels, redundant Cisco 7200 class equipment and a combination of Radware for load-balancing and F5 gear for application traffic response-time predictability. External access avenues are protected by high availability firewalls from Netscreen and Checkpoint, and the DMZ utilizes Network IDS for additional inspection control. Other input/output resources include multiple pairs of customer dedicated-link VPN channels and over 22,000 fax/phone message delivery lines. All network and hardware performance is monitored 24x7x365 by our professional operations staff, aided in their task by HP OpenView, MicroMuse NetCool, and several internally developed exception reporting or product specific alert mechanisms. Lastly, Premiere Global Services strives to spread its third party communication paths among potential alternate providers, using varied paths or distinct routing to further reduce risk where possible.

3.1.3 Resource Availability

Due to our partnerships and purchasing power, Premiere Global Services maintains quality high-volume relationships with our major vendors. These relationships allow us to rapidly acquire equipment in emergencies. Premiere Global Services also actively pursues third-party high-volume discounts by maintaining relationships with alternate channel providers. These actions are taken to protect Premiere Global Services and its customers from vendor bankruptcies, focused denial-of-service attacks, or other potential failures resulting from a single service provider. When appropriate, Premiere Global Services assembles and passes on customer data protection requirements to its third-party communication vendors without disclosing the customer's name.

3.2 Site Controls

Premiere Global Services maintains its equipment in highly controlled low-profile facilities, utilizing state-of-the-art environment controls for atmospheric consistency and availability.

3.2.1 Power Supply

Commercial power is provided to the NJ facility by two separate supply grids at Tinton Falls, N.J. The Data Center equipment room utilizes five Leibert System-3 AC units to ensure failover and redundancy. All hardware network and computer gear is power protected by a Powerware-935 uninterruptible power supply (UPS) capable of running the entire Data Center for 15 minutes. Electrical power for the Data Center and all office facilities is backed-up by a 7-second response time Cummins 1250kw diesel generator with a 2000-gallon fuel supply, which can run the data center for 3 days. Vendor maintenance contracts are in place to test these resources on a weekly basis.

The Virginia facility's electrical distribution center is aided by UPS and back-up diesel generators to ensure continuous power to customer systems. Furthermore, the entire electrical system is N+1 redundant and parallel electrical systems are included with each component to guarantee uninterrupted power. Features include:

- AC and DC raceways with 2N distribution
- AC power delivery via distributed redundant UPS systems
- Batteries with at least 7 minutes full load operation, and 48 hours of generator fuel
- Isolation K factor transformers used for 480 volt UPS to 280/120 volt. K factor of K20; 80 degrees Centigrade rise; copper winding DC system fuse protection and -48 volt delivery via fuse panels

3.2.2 Climate Controls

Both facilities supplement on-site operator monitoring by electronic management alerts, such as automatic direct fire department notifications, IDS and system alert pager systems, to ensure prompt handling of critical events by management personnel.

Both facilities are equipped with a dry-charged fire suppression system, along with detection systems for water and climate controls.

To provide optimum conditions for equipment operation, the Virginia facility also utilizes an HVAC system to ensure appropriate airflow, temperature and humidity. Redundancy provides additional protection for customer operations. This facility is also built to withstand earthquakes.

3.3 Change-Control Practices

Premiere Global Services relies on an all-encompassing change management practice for any alterations to the production network, and hardware or software components. Premiere Global Services requires certified testing in production-mirrored development, QA, and beta environments before migration is allowed in any production customer usage area. Furthermore, Premiere Global Services keeps its development staff in a separate environment and limits all other areas to necessary software view-only access.

All production changes are batched into tri-weekly upgrades to minimize impact periods, but emergency fixes (e.g., CERT advisories) follow the same process before selected movement. All movements into production require documented certification of testing, impact statements and back-out instructions, along with necessary management approvals and emergency contact information. The document must be accepted by a change control committee and Operations prior to any change activity.

4. Disaster Recovery

Premiere Global Services is dedicated to maintaining premium levels of customer access, product performance and service responsiveness by maintaining extremely resilient resources. Premiere Global Services is further committed to exceeding industry-standard levels of disaster recovery, giving priority to service resumption and data recovery.

Premiere Global Services has taken proactive measures to ensure that business may continue with no or minimal interruption should a disaster strike. Premiere Global Services has adopted guidelines to develop, implement, and test business continuity plans to protect its information resources against disruption. Safeguards exist to minimize risks, costs, and duration of disruption to business processes in the event of damage to, failure of, loss of, corruption of or discontinuation of any component of Premiere Global Services information resources.

Premiere Global Services adds the protective measure of provisioning redundant facilities with reserve processing capacities, including local and off-premise backups of essential information to mitigate the possibility of system loss or failure as much as possible. Customers with contracted QOS agreements can count on Premiere Global Services to provide appropriate levels of service from one or more of its alternate facilities until such time as the network is restored to full operation. This commitment to availability is an integral part of Premiere Global Services customer care mission.

Premiere Global Services maintains extensive facility insurance and has the financial backing of our corporate office, to assist with recovery expenses.

4.1 Risk Assessment & Prevention

Premiere Global Services has adopted guidelines to develop, implement, and test business continuity plans for its information resources as they support critical business processes. All business continuity assessments evaluate the risk and vulnerability of damage to, failure of, loss of, or corruption of the information resource components that support Premiere Global Services business, whether completely or partially interrupted. Such guidelines provide for the protection of client information as well as Premiere Global Services information and information systems against disruption.

Management actively sets the tone and promotes programs for ongoing risk assessment and reduction, and supports the development and maintenance of necessary procedures and product standards needed to keep current with evolving issues. Reasonably foreseeable events are vetted by a series of design review forums, security evaluations and penetration testing. Various risk scenarios that may impact the infrastructure, operations or ability to meet compliance requirements are constantly evaluated. The Security Manager, responsible for information security and contingency, ensures that security considerations are addressed in all risk assessments and with the implementation of a security program.

Since problem avoidance improves customer service levels and our internal efficiency, Premiere Global Services continuously pursues risk reduction in every component of our products and infrastructure. From application design to information acquisition/delivery decisions, Premiere Global Services strives to minimize potentially damaging exposures. Each component and every action is evaluated in advance to ascertain how and where it might negatively affect on time deliverables. Most importantly, measures that are most likely to reduce problems are carefully assessed and, when appropriate, implemented.

4.2 Critical Data

After our employees and software, Premiere Global Services most critical resources are its processing facilities and extensive commercial communications provisions. Premiere Global Services protects these resources through distributed processing, which provides ready and capable back-up for our facilities, critical software, assembly and delivery capabilities, and knowledgeable professionals.

Actual mission-critical data components vary based on the services PGS provides to specific customers. While the operating system/s and actual Premiere Global Services product code are always backed-up in multiple ways and at multiple sites, client data falls into one of two camps.

4.2.1 Transitory Communiqués

The largest percentage of customer traffic entering Premiere Global Services facilities is transitory-communiqués such as faxes and email messages. Transitory communiqués are complete message packages (e.g., content, address list, headers) delivered to Premiere Global Services for immediate delivery, based on established service contracts. Much like phone calls, Premiere Global Services assumes the customer maintains this input until a confirmation report is delivered showing Premiere Global Services has successfully completed the job.

4.2.2 Repository Services

The second type of customer data is repository services. This typically consists of “stored objects” (e.g., custom parsers, client address lists, logos, fax cover sheets) that are used for the assembly and delivery of messages. Data in repository classes is backed-up locally by Premiere Global Services and periodically rotated off-premises. Retention in all classes is in accordance with applicable FCC, FTC, and computer industry standards, unless a longer or shorter duration is specified in the contract.

4.3 Response to Outages

Service interruptions can be categorized as either partial outages or true disasters. A partial outage includes temporary deficiency of some essential resources that threaten timely service completion. A true disaster refers to fires, floods and other natural disasters that render critical resources totally unavailable for an unacceptable period of time. Premiere Global Services responds to such issues based on the source, criticality, and classification of the problem. In all cases, the party first aware of potential mission critical slippage is responsible for taking the lead in initiating recovery actions and notification.

4.3.1 Partial Outages

During a partial outage, typically one element (frequently processing or communications based) is unavailable to complete its task while the remaining operations are fully functional. Partial outages are common in today’s technological world, requiring hardware and communication failure resolution, lost data recovery, report issuance, password re-issuance, and similar activity.

4.3.1.1 Premiere Global Services Site Issues

As noted, Premiere Global Services has redundancy and failover capabilities built-in and surrounding its system hardware, software and network architecture. The company also maintains extensive internal data backups and redundant hardware for critical elements of our production site. These measures prevent most local issues from escalating and promote high availability of our sites.

4.3.1.2 Customer Site Issues

It is important to note that while Premiere Global Services proactively addresses all outages, Premiere Global Services cannot fix procedural or technical problems originating at a customer site or between customer and Premiere Global Services sites. In such instances, the Customer Care Department offers technical support to help customers resolve issues. Premiere Global Services Customer Care may be contacted by calling our toll-free (800-333-0568) or direct toll (732-389-3900) number.

Furthermore, Premiere Global Services is not able to address any customer recipient-end disaster related delivery problems other than reporting back to our client that the message was not accepted for delivery in our job completion reporting.

Customer site issues you may experience include Telco voice and data channels.

Issue	Premiere Global Services Response	
Telco Voice Channels	Premiere Global Services is prepared to dynamically switch its inbound provisions to alternate channels should it detect any failure that hinders contacting Customer Care.	
Telco Data Channels	Communications resources constitute one of today's most critical elements in getting the job done quickly. A number of built-in redundancy options and alternatives are available should the primary means of sending/receiving data become inoperable. If a customer experiences transmission difficulties, Premiere Global Services Customer Care Department can help troubleshoot many problems and coordinate switching a customer to alternate paths, as noted below:	
Telco Data Channels	Dial-In	The access path used to initiate Premiere Global Services service requests may become unusable due to line problems or hardware failure on either end. Alternatives include switching to Internet-based transmission (ftp/email) or a Fax inbound type services after coordinating input-processing related issues with our Customer Care Department.
	Dedicated Leased-Line	The access usage and problem resolutions are similar to dial-in above. Dial-backup services can be provisioned ahead of time to make failover of the primary channel virtually transparent. Extended service interruptions are possible if the customer's hardware fails or their communication hub suffers an outage. In such cases, alternative solutions, like those mentioned above, are available to include necessary encryption services to best protect sensitive customer data.
	Internet	The loss of customer transmission capabilities is highly unlikely due to the resilience and redundancy of the Internet, as well as Premiere Global Services multitude of in-bound protective measures. Difficulties are still possible if hardware used to establish virtual (encrypted) channels fail or other limited resources exist at the customer and/or their access provider's end. Transmission alternatives include switching to dial-in paths, for example, using the Fax-in service.

4.3.2 True Disasters

On rare occasions, events may require companies to leave their production facilities and activate components of their complete disaster plans. In such instances, recovery facilities and off-site resources are essential to ensure quick resolution of service.

Premiere Global Services has addressed disaster recovery by deploying nearly identical product suites in multiple production facilities around the world. In the unlikely event that a production site or region suffers an emergency so severe that the site cannot reasonably service its critical customer needs, alternate sites will share service responsibilities.

4.3.2.1 Premiere Global Services Provisions

Should Premiere Global Services emergency response and damage assessment teams determine that a current facility is not able to sufficiently resume operations to meet customer requirements, they will declare an official disaster and activate the firm's recovery operation plan. Refer to section 3.1, '**System Redundancy & Availability**', for details on the recovery plan.

4.3.2.2 Recommended Customer Provisions

To ensure our customers are able to quickly recover from a true disaster, Premiere Global Services recommends that customers maintain copies of all transmitted service requests until receipt of PGS service completion reports. Elements that are key to resuming normal PGS services include customer ID and contract

information, transmission addresses, copies of headers, mailing lists, and anything else commonly sent with a service request. Copies of encryption keys used for existing public-key (RSA), private-Key (DES) and VPN-type service avenues should also be maintained. Most importantly, internal procedures should be followed for the assembly and approval of service requests.

In addition, customer disaster plans should include Premiere Global Services contact and contracted service information. Premiere Global Services Customer Care Department can help our customers resume nearly normal operations and may be able to recommend special disaster-related customer or employee services offered by Premiere Global Services.