

DTCC Producer Management Portal Implementation Guide

Version 1.0 - Last Updated June 20, 2013

Based on the I&RS' Licensing & Appointments (LNA) and ACORD Life and Annuity Standards v 2.28.00



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1 INTRODUCTION

The purpose of this guide is to explain how the DTCC Producer Management Portal "Portal" service works and the messages and record layouts supporting it. Accompanying this guide are several other related files. These include:

- DTCC Producer Management Portal Business & Functional OverviewDTCC Licensing and Appointments (LNA) Record Layouts from IPS Website
- DTCC Producer Management Portal Connectivity Guide (In draft)
- DTCC Producer Management Portal Technical Guide (In draft)
- ACORD Life and Annuity Standard public schemas v2.28.00 (TXLife, XMLife, XTbML, XMLifeBase)
- DTCC Producer Management Portal Use Cases

Have Questions:

Producer Management Portal processing questions for DTCC should be directed to your Relationship Manager to establish a communication pipeline for customer support inquiries. Beginning with the participant implementation discussion phase of Producer Management Portal, firm inquiries should be directed to either of the following contacts:

- Customer Hotline number is: 888-382-2721; then press options: 6, 7, 2
- Mailbox for inquiries: INSURANCE@DTCC.COM

1.1 Process Overview

DTCC's Insurance Processing Services (IPS) for Producer Management Portal provides a centralized industry solution to share, track and verify producer training completions as required by state regulators.

The development based on customer directive by I&RS Senior Advisory Board (SAB) members, as well as members of the Operations Managers' Roundtable (OMR), to assist in managing the communication of regulated producer training requirements for annuity sales.

NAIC adoption of the 2010 Suitability in Annuity Transactions Model Regulation which establishes a regulatory framework that holds insurers responsible for ensuring that annuity transactions are suitable, require that producers be trained on the provisions of annuities in general, and the specific products they are selling.

DTCC focused their support of the NAIC adoption of the Model Reg based on a multi-phase approach by leveraging existing I&RS products and technology investments to produce the desired industry solution.

This phase of the project will provide a comprehensive, real-time, web services messaging validation portal to centralize the producer authorization process within an industry repository. This service will allow a producer training inquiry at point-of-sale or other transaction processing; training inquiry or look up utilizing a user interface, real-time messaging/confirmation process and data warehousing.

The industry authorization solution allows users the following:

- Transparency of the producer's training to the users;
- Verify at point of sale the completion of the required training for both the product and state producer training;

- Allow Distributors to do "pre-screening" of a producer's ability to offer the carrier products to their clients in a specific state:
- Online function to view a producer's training completion profile makes training portable.
- Reduce NIGO training issues;
- Ability to track producer training, state and product outside of a preferred vendor (e.g. wholesaler from carrier doing physical training session);

The Producer Management Portal service is leveraging existing technology currently offered and supported by DTCC:

License and Appointment (LNA)

 Leverage LNA Training Update (TU) and Periodic Refresh (PR) detail records from insurance carriers and training vendor platforms to populate and maintain information regarding producers and data related to their training completions.

Insurance Data Solutions (IDS) warehouse

- Store, maintain and offer real-time messaging capabilities for training and authorization data.
- Provide capability to load carrier and distributor data via LNA.

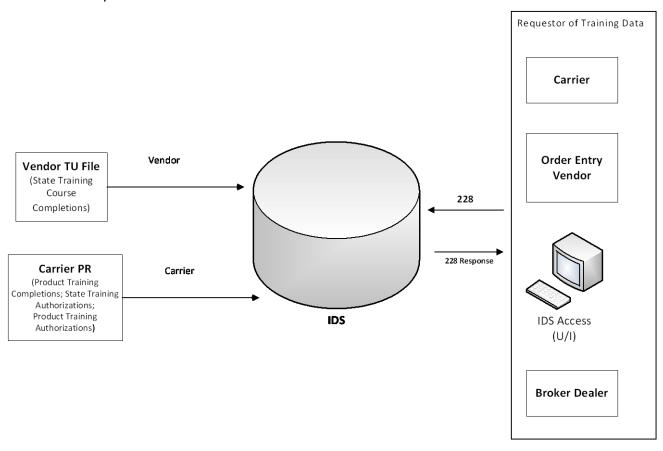
Access Platform & Web Services

 Offer web portal and user interface for a real time inquiry of authorization details as well as completions reporting.

1.2 Producer Management Portal Participant Process Participation Assumptions

- The Producer and their required training, both at the state and product level will be handled between each distributors and carrier outside of DTCC. The training requirements and courses will be created by the Insurance Carriers typically through a third party training vendor who will be responsible for creating the courses and getting them approved by the individual states.
- All carriers may accept images of all training certifications or proof of course completions
 received directly from the distributors and will determine training satisifation based on internal
 compliance review procedures.
- All XML messages, used in the Producr Inquiry functionality does not support the use of the
 Attachment Object. If supported by insurance carrier, a separate Training Update transcation
 (TU) will need to be sent via the full LNA functionality along with a DTCC Attachment message
 to transmit proof of state course completions. This communication of the training update will
 occur outside of the Producer Management Portal service.
- All users of the Producer Management Portal service are DTCC Solutions clients and have completed, submitted and received approval from DTCC. For more information on becoming an insurance user under DTCC Solutions, LLC, please see section3 - DTCC Solutions, LLC. User Onboarding Process.

1.2.1 Graphical Process Overview



1.3 Producer Management Portal Service Requirements

For more information, reference the following material documents: (These documents are currently in draft form.)

- http://www.dtcc.com/products/documentation/technology/SMART%20user%20guide.pdf
- Producer Management Portal Connenctivity Guide document on website Participant Section (in draft)
- Producer Management Portal Technical Guide ocument on website Participant Section (in draft)
- Producer Inquiry Schema and WSDL within zip file on website Participant Section
- Membership Requirements NSCC and DTCC Solutions Participant Section

1.4 Basic message level choreography

There will be two ways a requestor may make an inquiry for producer training information. This includes utilizing the User Interface via DTCC Web Portal Access platform or via B2B web service message. A requestor may be a Broker/Dealer's back office, Producer via Solution Provider; or Insurance Carrier.

The following message navigation defines the generic process the Producer Management Portal will follow to create the producer training response message back to the requestor data. This training process will be used regardless if the user is accessing the users of the Access platform (user interface):

- 1. Requestor initiates training inquiry for training via the Portal
- 2. IDS receives inquiry and validates user credentials as a carrier and/or distributor.
- 3. DTCC Producer Management Portal database receives inquiry.
- 4. DTCC locates Producer (SSN look up.) If the producer is found, continue to step 5. If not found, return of an error message "Producer Not Found". *Hard Stop*
- 5. Verify distributor affiliation match submitting distributor with producer's affiliated distributor which is based on the distributor's DTCC participant ID populated by the Insurance Carrier in the stored LNA PR. If distributor affiliation matches, then proceed to validating state and product training in step 6. If distributor affiliation does not match; return an error message of "Distributor Affiliation Does Not Match/Exist." *Hard Stop*
- 6. Validate State Training
 - a. Locate appropriate state code; pull the State Training Satisfied Indicator and State Training Satisfied Reason code, if appropriate. Build response for state training and continue to product training inquiry.
- 7. Validate Product Training
 - a. Locate appropriate product CUSIP; pull the Product Training Satisfied Indicator and Product Training Satisified Reason code, if appropriate. Build response for product training and return inquiry to originator.

1.5 General DTCC Processing Rules

<u>Note</u>: Data is case sensitive. When alpha characters are used within data values, use the proper case (UPPER, lower) to match previous stored values.

- 1. Insurance carriers will ulitize the I&RS' Licensing and Appointment (LNA) Periodic Reconiliation (PR) transation to populate the Portal with the appropriate training course completions and producer level training authorizations. The PR transaction will include a Portal Storage Indicator of "Y" (Yes) that will notify DTCC that the transaction data will be used to populate the Portal. This is located in item #6120 in the 53/01 L&A Producer Entity record.
- 2. <u>Schema version</u>: The producer training iquiry transaction (TXLife 228) is based on a subset of the ACORD XML schema version 2.28.00.
- 3. <u>DTCC message and User Interface timeframe process</u>: DTCC will process messages when received (not as a batch process). The messages will be validated and delivered to the end-destination or rejected back to the originator for correction.

- 4. <u>Distributor Participant acceptance to send and receive messages</u>: Carriers who elect to participate in the web services process to retrieve data from the Portal, will be eligible to process all message information (TXLife 228). All participating users will need to approved users via DTCC Solutions. The trading relationship methodology may apply based on training satisfication which is determined by the individual insurance carriers based on the information supplied by Insurance Carriers utilizing the Licensing and Appointment (LNA) service.
- 5. Operations Hours: DTCC hours of operations supporting the Producer Management Portal service are as follows: Monday Friday 6AM (et) 10PM (et). There are no Saturday or Sunday hours of operation. Inquiry messages coming into DTCC during non-processing hours will not be processed and the send will receive a '404' HTTP error. The sender of the message will be responsible to resubmit their inquiry message to DTCC during operational hours. DTCC will not pend messages received during off-hour for future processing.

1.6 Producer Management Portal Processing Guideline (Best Practices) – Data Population

The population of the Portal will have the ability to leverage existing Licensing and Appointments (LNA) development by utilizing existing transactions.

Insurance Carriers will leverage the LNA Periodic Reconciliation (PR) transaction type to populate the training completions with a new field titled Portal Storage Indicator of Y or "yes." This Storage indicator field was added to the 53/01 Producer Entity Record allows the insurance Carrier to instruct DTCC to utilize the LNA PR process to populate or update the database tables. The data from the following records will populate four separate tables within the database that will be used to validate and respond to the specific inquiry by the requestor.

DTCC will store and track the adoption of the product and state requirements by the individual states as part of the validation process for retrieval of data from the repository.

A table titled "State Master" will be maintained by DTCC which will track the individual states adoption of the training requirements at both the product and state level. As stated, this will allow DTCC to send back appropriate response messages to the requestor that training is not needed for a specific request of data.

The data included in this table include:

- State Identifier
- ACORD State Identifier
- State/Territory Name
- State CE Effective Date
- Product Training Effective Date

While the carrier will be responsible to determine if the producer's training requirement has been satisfied, the state training course completions that are offered by education providers are owned by the producer. Therefore, the Portal will be populated by third party education providers for all state training course completions for producers based on the information sent to DTCC.

This information will be stored and available to all users who request data for the Course Detail information regardless of the producer's affiliation. This information will be pulled from the 5316 record which populates the Producer/Course table. Please see section 6 for data retrieval.

The population of Portal will align with the existing output cycle of the current Licensing & Appointment (LNA) service. If the carrier sends a LNA PR with Storage Indicator = Y (PR-Y) or the education providers sends a TU file, DTCC will update the Portal. These times are 7:00am, 10:00am, 1:00pm, and 4:00pm Eastern Time.

The carrier will send all appropriate producers to DTCC for population in the Portal. The storage of the data, at the producer level, is determined by the unique storage key of "CarrierID/DistributorID/ProducerID" and will create unique records within the three tables submitted by DTCC.

Upon receipt of the PR-Y, DTCC will search all tables for the unique storage key and delete all applicable records. With the new data received in the PR-Y transaction, DTCC will populate new records from data passed by the insnce carrier as defined in 2.2.2 section of this guide.

1.7 Producer Management Portal Processing Guideline – Deletion of Producer Records (Best Practices)

The deletion of producer records or change of distribution affiliation must be maintained by the insurance carriers and the usage of the PR-Y transcations.

Upon receipt of the PR-Y transaction, DTCC will search all Portal tables for the unique storage key and delete all applicable records. Based on the data received from the new PR-Y transaction, DTCC will populate the data as appropriate.

For full deletion of producer's record, <u>no</u> 53/16, 17 or 18 records should be sent. This will result in the producer/course, state training authorization and product training authorization tables not being updated therefore removing the producer from the Portal.

1.8 Producer Management Portal Processing Guideline – Data Retrieval (Best Practices)

DTCC will provide two ways to inquiry for data from the Producer Management Portal by supporting real-time authorization messaging or by a manual look up of a producer training via the DTCC user interface (UI.) The UI will be available via DTCC Web Portal.

Each of the retrieval processes will allow the user to request specific data to be retrieved from the Portal. The training inquiries are defined by the type of data being pulled and presented back to the requester based on a TXLife web message 228 and specific subtrans types or by DTCC user interface application.

The requesting firm may be an insurance carrier, distributor (or service producer on behalf of distributor), or the user interface available on the DTCC web portal.

ACORD TXLife 228 message is currently based on a subset of the ACORD XML schema version 2.28.

DTCC will create and transmit a training inquiry response message in the format based on the origination of the request. This will be either the web service B2B message or the user interface available on the DTCC web portal.

As previously stated, the training inquiry and validation process will be defined based on the type of inquiry and is outlined below:

If Distributor is requestor; the retrieval key will be defined as ProducerID/DistributorID: or If Carrier is requestor; the retrieval key will be defined as ProducerID/CarrierID.

The requestor of data from the repository has the ability to define, as part of the onboarding process how the training data will be requested and delivered by DTCC. The output delivery of the response to the requester's inquiry will be based on the Requestor submission process as well as pre-determined LNA PR record layout and batch process.

DTCC will offer three types of delivery:

- 1. Real-time delivery of response utilizing DTCC current B2B web services.
- 2. DTCC Web Portal User Interface
- 3. Batch delivery of responses based on a pre-determined output cycle times of 7:00am, 10:00am, 1:00pm, & 4:00pm. All eastern standard times and will be the delivered in the Periodic Reconciliation (PR) record format.

<ResultInfoCodes>

Scenario in the Sequence Diagram	ResultCode	ResultInfo Code	ResultInfoCode Description
	_		
Training Inquiry was rejected (failure)	5	200	DTCC System and Business Validation Error
Training Inquiry was processed with information	2	4200	State Does Not Require Producer State Training
Training Inquiry was processed with information	2	4201	State Does Not Require Producer Product Training
Training Inquiry was processed with information	2	4202	Producer Not Found
Training Inquiry was processed with information	2	4203	Producer Affiliation Does Not Match/Exist
Training Inquiry was processed with information	2	4204	State Training Not Found
Training Inquiry was processed with information	2	4205	State Training Has Expired

Training Inquiry was processed with Information	2	4206	Application Date Prior to State Training Effective Date
Training Inquiry was processed with Information	2	4207	Application Date Prior to Product Training Effective Date
Training Inquiry was processed with Information	2	4208	Product Training Not Found
Training Inquiry was processed with Information	2	4211	State Training Found
Training Inquiry was processed with Information	2	4212	Product Training Found

1.9 Producer Management Portal – User Interface – DTCC Web Portal

The Portal allows for users to access the producer training information via our DTCC Web Portal to manually retrieve data based on the same critiera as available with the ACORD web services messages.

The three (3) types of inquiries are based on an unique Producer Identification and if applicable, the sales attributes of the annuity transaction.

The inquiries are defined as:

- Point of Sale Inquiry
 - This message is used to request DTCC to provide a 'yes/no' response to validate a producer is authorized for a particular annuity sale, given the produce entity recognition, application state, product CUSIP, and application date. This transaction is used by distributors only.
- Producer Training Inquiry
 - This message is used to request DTCC to provide all training authorization information that the database holds based on the producer entity recognition and will return all results provided within the 53/17 and 53/18 records on the LNA PR transaction provided by the insurance carreirs. This will include both carrier product and state training authorizations data based on training course completions and state reciprocity rules. This transaction is used only by the distributors.
- Course Detail Look Up Inquiry
 - This message is used to request DTCC to provide all training course completions detail information that the database holds based on the producer entity recognition. This will include both carrier product and state course detail provided by the carrier on the PR 16 record, and from the vendor on the Training Vendor TU file. This message may be used on both distributors and insurance carriers and product training will be based on firm affiliation to the producer.

1.10 ACORD Insurance Standards

These messages are based on the ACORD Life and Annuity Standards. ACORD provides an open insurance industry XML vocabulary which defines a common, consistent view of insurance information. All messages herein are based on the ACORD Life Standards Data Model. This means every message regardless of sender and/or receiver (or systems) and regardless of process all share a consistent means of describing like data – a Policy is always a Policy and is always formatted and defined the same. This consistency reduces translation effort (and errors) and ensures that all participants in the insurance value chain can share a common understanding as well as view of insurance data.

For more information contact ACORD at <u>Life@acord.org</u>. The public standards are available on their website at <u>www.acord.org</u>.

2 MESSAGE AND RECORD LAYOUT DETAILS

2.1 ACORD XML Message Structure Overview

The ACORD Life and Annuity Standards are built first on a common data model. All specific insurance business processes, AKA messages, are then defined using the life data model, with only those elements necessary are used. All messages however will always define a given element in the same way, thus promoting reuse, consistency and a common vocabulary for describing insurance concepts. When looking at only a specific message the design of the message may seem un-optimal, and indeed it most likely is. This is due to the greater objective of always having insurance concepts modeled in the same consistent method regardless of process or message.

2.1.1 Basic Message Construct

Every message begins with a message or transaction 'header'. It defines the transaction type and transaction level information like date & time, etc. Its' basic form is...

TXLife

TXLife **Request** (created by sender for this service) OLifE (specific message business data)

And then the response comes back as...

TXLife

TXLife **Response** (created by recipient for this service)

TransResult ← Location of success or failure and details

OLIfE (specific message business data)

Each message then has a specific set of expected business data to accompany or be returned in a request or response message. The basic form for the messages here (a subset of the overall ACORD Life Data Model) is...

OLIFE

Holding – (one per contract)
Policy
Life or Annuity (one per policy)
Party – (one for each entity in the message; e.g. Producer and Distributor)
Person or Organization
Producer (either an individual or a distributor)

Every message in the ACORD Life and Annuity Standards follows this exact pattern.

2.2 Message Transaction Catalog

The following message transaction are part of this Producer Management Portal (Training Inquiry) Service, each are documented in the tables and examples which are available in the Producer Management Portal Data Dictionary document located on our I&RS website.

Message Transaction Catalog

Wessage Hallsaction Catalog					
Message Type	Message Description	DTCC Web Portal Transaction Type			
Is the Producer Trained?	This message is used to request DTCC to provide a "yes/no" response to validate a producer is authorized for a particular annuity sale, given the producer entity recognition, application state, product CUSIP, and application date.	Point of Sale Inquiry			
TXLife TransType 228,					
TransSubType 22814	This message is used only distributors (or service providers on behalf of a distributor.)				
Producer Training Inquiry	This message is used to request DTCC to provide all training authorization information that the database holds based on a the producer entity recognition and will return all results provided within the 53/17 and 53/18 records on the LNA PR transaction submitted by the insurance carrier. This will include both carrier product and state training authorization data.	Training Authorization Inquiry			
TXLife TransType 228,TransSubType 22815					
	This message is used only by distributors (or service providers on behalf of distributors.)				
Producer Course Detail Only (Course Detail Look Up	This message is used to request DTCC to provide all training course detail information that the database holds based on the producer entity recognition. This will include both carrier product and state course detail provided by the carrier on the PR 16 record, and from the vendor on the Training Vendor TU file.	Course Detail Look Up			
TXLife TransType 228, TransSubType 22816	This message may be used on both				
	distributors and carriers.				

2.2.1 Training Inquiry Request Message

Table Legend:

DTCC Element: Basic name of field

ACORD Element: actual name of data element in the ACORD schema.

DTCC Validates: "Y" = Yes DTCC edits/validates, "N" or blank they do not

<u>Use</u>: "R" = Required, must be provided, "C"=Conditional with the condition when it's required defined.

In the ACORD Element section are two specific description notations. The first sentence is the parent object and property or attribute where the information is stored. The second notation is a more precise statement using XPath notation, of exactly where in the message this data can/should be found (based on the examples provided).

<u>Type</u>: "A" = Aggregate or container object, "B=Boolean, "S" = String, "D" = Date, "T" = Time, "C" = Currency Amount. When a name, this is the name of the type code table or code list. Data elements that are "D" (Date) and "T" (Time) types should follow the XSD:Date and XSD:Time format.

The DTCC will validate the following:

- Max fields lengths are not exceeded for selected fields
- Specified field formats are followed
- Required fields are present
- Other specific DTCC validations defined in the definition section
- Precondition (Suggested Usage) = the precondition is suggested usage for the carrier. DTCC can not validate the pre-condition. If a value is present for the property, DTCC will perform the validation specified for the property.

The data elements that are defined based on the specific request of data inquiry and defined response is outlined in detail in the following document titled "Producer Management Portal Data Dictionary" This document is located on our I&RS website.

2.2.2 NSCC Record Layouts: Licensing and Appointment (LNA) Periodic Reconciliation (PR) & Training Update (TU) Processing

For carriers populating the Portal for their trading partners, DTCC added two new records to the existing LNA PR transaction which allows the carriers to populate the producer's state and product training based on the carriers' confirmation that the training requirement has been satisfied.

The two new records - 53/17 – Producer State Training Confirmation and the 53/18 – Producer Product Training Confirmation records will be used by the carriers to send authorization confirmations to the Portal for each producer.

The new Producer State Training Confirmation record will allow the insurance carrier to submit a series of states where the producer has satisfied the state training requirement, based on the training course completions or by the carrier's reciprocity rules.

The new Producer Product Training Confirmation record allows the insurance carrier to submit a series of product CUSIP numbers where the producer has satisfied the specific product training requirement for the annuity suitability training.

The Storage Indicator field will be used only on PR transaction and with no other transaction types. If the Storage Indicator = Y then the following looping structure will be as follows and all other records will be optional:

- 50 Submitting Header Required (this defines the carrier affiliation)
 - 52 Contra Header Required (this will define the distributor affiliation)
 - 53/01 Producer Entity Required
 - 53/02 Producer Entity ID Required
 - 53/03 Producer Name Required
 - 53/05 Producer Communication Optional
 - 53/16 Producer Training and Continuing Education Optional
 - 53/17 Producer State Training Confirmation Optional
 - 53/18 Producer Product Training Confirmation Optional

DTCC will store specific data elements from the above mentioned records based on the following repository tables:

- Producer/Course Table (table 1)
 - Data elements from records 50, 52, 5301, 5302, 5305, and 5316
 - Data elements include:
 - Submitter ID required (PR = #6000; TU = #6702)
 - Distributor ID required (PR = #6050; TU = spaces)
 - Producer Tax ID required (PR/TU = #6150)
 - Producer National Producer Number optional (PR/TU = #6153 NP)
 - Distributor Producer ID optional (PR/TU = #6152 J8)
 - Carrier Producer ID optional (PR/TU = #6153 IN)
 - Producer Last Name required (PR/TU = #6202)
 - Producer First Name required (PR/TU = #6203)
 - Producer E-mail Address optional (PR/TU = #6302)
 - Course Provider ID required (PR/TU = #6702)
 - Course Type required (PR/TU = #6703)
 - Course Training Method required (PR/TU = #6704)
 - Course Number required (PR/TU = #6705)
 - Course Title required (PR/TU = #6706)
 - Course Completion Date required (PR/TU = #6707)
 - Course Expiration Date required (PR/TU = #6708)
 - State optional/conditional (PR/TU = #6709)
 - Course Credit Hours optional (PR/TU = #6710)
 - Certification Date optional (PR/TU = #6711)
 - Certification Number optional (PR/TU = #6712)
 - Product Training Category optional (PR/TU = #6713)
 - Product CUSIP optional (PR/TU = #6714)
 - Certificate State optional (PR/TU = #6716)
- Producer State Authorization (table 2)
 - Data elements from record 5317
 - Each 5317 record can be repeated up to 10 times per single LNA transaction (record 5301) and each record can support up to 10 states or US territories.
 - Data elements include:
 - Carrier ID required (PR = #6000)

- Distributor ID required (PR = #6050)
- Producer Tax ID required (PR = #6150)
- Producer Training State required (PR = #6800)
- State Training Satisfied Indicator required (PR = #6801)
- State Training Satisfied Reason Code optional/conditional (PR = #6802)
- State Training Effective Date required (PR = #6803)
- State Training Expiration Date optional (PR = #6804)
- Producer Product Authorization (table 3)
 - Data elements from record 5318
 - Each 5318 record can be repeated up to 10 times per single LNA transaction (record 5301) and each record can hold up to 10 CUSIP numbers.
 - Data elements include:
 - Carrier ID required (PR = #6000)
 - Distributor ID required (PR = #6050)
 - Producer Tax ID required (PR = #6150)
 - Product CUSIP required (PR = #6850)
 - Product Training Satisfied Indicator required (PR = #6851)
 - Product Training Satisfied Reason Code optional/conditional (PR = #6852)
 - Product Training Effective Date required (PR = #6853)

The LNA record layouts are available on our I&RS website located under our current and production record layouts. Click on <u>LNA Record Layouts</u> to see the last version.

3 DTCC SOLUTIONS, LLC USER ONBOARDING PROCESS

DTCC's Producer Management Portal service is being offered a subsidiary of DTCC called DTCC Solutions, LLC. This section provides provides information and requirements on becoming a user. Please contact your I&RS Account Manager at insurance@dtcc.com for individual assistance with the onboarding process.

DTCC Solutions, LLC Onboarding Documents

- DTCC Solutions, LLC Non-Member Questionnaire (doc)
- DTCC Solutions, LLC User Agreement (pdf)
- DTCC Solutions, LLC Operating Procedures (pdf)
- Invoice Settlement Form (doc)

The user agreement and operating procedures outline to the firm how DTCC works within our DTCC Solutions, LLC subsidiary and defines our processes and procedures for working with DTCC. The PMP appendix defines our service and outlines the pricing structure for the service itself.

Please contact your I&RS Account Manager at insurance@dtcc.com for individual assistance with the onboarding process.

Document Revision Updates – changes from baseline document drafted June 20, 2013

Date	Document Version	Change
06/20/2013	1.0	Initial production version, posted to the I&RS website.