

# NERC

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

January 31, 2011

Ms. Kimberly Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: NERC Abbreviated Notice of Penalty regarding Unidentified Registered Entity,  
FERC Docket No. NP11-\_\_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Abbreviated Notice of Penalty (NOP) regarding Unidentified Registered Entity (URE), with information and details regarding the nature and resolution of the violation<sup>1</sup> discussed in detail in the Disposition Documents attached hereto (Attachment a), in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).<sup>2</sup>

After being notified that WECC was initiating the semi-annual Critical Infrastructure Protection (CIP) self-certification process, URE self-reported its noncompliance with CIP-007-1 R4 for its failure to add anti-virus and anti-malware software to workstations and network-based video capture appliances. This NOP is being filed with the Commission because URE does not dispute the violation of CIP-007-1 R4 and the assessed six thousand five hundred dollar (\$6,500) penalty. Accordingly, the violation identified as NERC Violation Tracking Identification Number WECC200901728 is a Confirmed Violation, as that term is defined in the NERC Rules of Procedure and the CMEP.

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<sup>1</sup> For purposes of this document, each violation at issue is described as a "violation," regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

<sup>2</sup> *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2010). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A). See 18 C.F.R. § 39.7(c)(2).

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**Statement of Findings Underlying the Violation**

This NOP incorporates the findings and justifications set forth in the Notice of Confirmed Violation and Proposed Penalty or Sanction (NOCV) issued on January 29, 2010 by WECC. The details of the findings and the basis for the penalty are set forth in the Disposition Document. This NOP filing contains the basis for approval of this NOP by the NERC Board of Trustees Compliance Committee (BOTCC). In accordance with Section 39.7 of the Commission’s Regulations, 18 C.F.R. § 39.7, NERC provides the following summary table identifying each violation of a Reliability Standard at issue in this NOP.

Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty (\$)
WECC	Unidentified Registered Entity	NOC-485	WECC200901728	CIP-007-1	4	Medium <sup>3</sup>	6,500

**Statement Describing the Assessed Penalty, Sanction or Enforcement Action Imposed<sup>4</sup>**

**Basis for Determination**

Taking into consideration the Commission’s direction in Order No. 693, the NERC Sanction Guidelines and the Commission’s July 3, 2008 and October 26, 2009 Guidance Orders,<sup>5</sup> the NERC BOTCC reviewed the NOCV and supporting documentation on July 12, 2010. The NERC BOTCC approved the NOCV and the assessment of a six thousand five hundred dollar (\$6,500) financial penalty against URE based upon WECC’s findings and determinations, the NERC BOTCC’s review of the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violation at issue.

In reaching this determination, the NERC BOTCC considered the following factors:<sup>6</sup>

1. the violation constituted URE’s first occurrence of violations of the subject NERC Reliability Standards;
2. WECC reported that URE was cooperative throughout the compliance enforcement process;

<sup>3</sup> When NERC filed Violation Risk Factors (VRFs) for CIP-007-1, NERC originally assigned “Lower” VRF to CIP-007-1 R4, R4/1 and R4.2. The Commission approved the VRFs as filed, but directed modifications. On December 19, 2008, NERC filed the modified “Medium” VRFs for CIP-007-1 R4, R4/1 and R4.2 for approval. On February 2, 2009, the Commission issued an Order approving the modified VRFs. Therefore, the “Lower” VRFs were in effect from June 18, 2007, until February 2, 2009, and the “Medium” VRFs for CIP-007-1 R4, R4/1 and R4.2 have been in effect since February 2, 2009.

<sup>4</sup> See 18 C.F.R § 39.7(d)(4).

<sup>5</sup> *North American Electric Reliability Corporation*, “Guidance Order on Reliability Notices of Penalty,” 124 FERC ¶ 61,015 (2008); *North American Electric Reliability Corporation*, “Further Guidance Order on Reliability Notices of Penalty,” 129 FERC ¶ 61,069 (2009). See also *North American Electric Reliability Corporation*, “Notice of No Further Review and Guidance Order,” 132 FERC ¶ 61,182 (2010).

<sup>6</sup> URE did not receive credit for having a compliance program because it was not reviewed by WECC.

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3. there was no evidence of any attempt to conceal a violation nor evidence of intent to do so;
4. WECC determined that the violations did not pose a serious or substantial risk to the reliability of the bulk power system (BPS) as discussed in the Disposition Document and
5. WECC reported that there were no other mitigating or aggravating factors or extenuating circumstances that would affect the assessed penalty.

For the foregoing reasons, the NERC BOTCC believes that the assessed penalty of six thousand five hundred dollar dollars (\$6,500) is appropriate for the violations and circumstances at issue, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to 18 C.F.R. § 39.7(e), the penalty will be effective upon expiration of the 30 day period following the filing of this NOP with the Commission, or, if the Commission decides to review the penalty, upon final determination by the Commission.

### **Request for Confidential Treatment**

Information in and certain attachments to the instant Notice of Penalty include privileged and confidential information as defined by the Commission's regulations at 18 C.F.R. Part 388 and orders, as well as NERC Rules of Procedure including the NERC CMEP Appendix 4C. Specifically, this includes non-public information related to certain Reliability Standard violations, certain Regional Entity investigative files, Registered Entity sensitive business and confidential information exempt from the mandatory public disclosure requirements of the Freedom of Information Act, 5 U.S.C. 552, and should be withheld from public disclosure.

In accordance with the Commission's Rules of Practice and Procedure, 18 C.F.R. § 388.112, a non-public version of the information redacted from the public filing is being provided under separate cover.

Because certain of the attached documents are deemed "confidential" by NERC, Registered Entities and Regional Entities, NERC requests that the confidential, non-public information be provided special treatment in accordance with the above regulation.

**Attachments to be included as Part of this Notice of Penalty**

The attachments to be included as part of this NOP are the following documents:

- a) Disposition of Violation, included as Attachment a;
- b) URE's Response to the Notice of Alleged Violation and Proposed Penalty or Sanction dated January 21, 2010, included as Attachment b;
- c) URE's Self-Certification, included as Attachment c;
- d) URE's Mitigation Plan submitted January 7, 2010, included as Attachment d;
- e) URE's Certification of Mitigation Plan Completion dated April 16, 2010, included as Attachment e; and
- f) WECC's Verification of Completion dated July 12, 2010, included as Attachment f.

**A Form of Notice Suitable for Publication<sup>7</sup>**

A copy of a notice suitable for publication is included in Attachment g.

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<sup>7</sup> See 18 C.F.R. § 39.7(d)(6).

**Notices and Communications**

Notices and communications with respect to this filing may be addressed to the following:

<p>Gerald W. Cauley President and Chief Executive Officer David N. Cook* Sr. Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, NJ 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile david.cook@nerc.net</p>	<p>Rebecca J. Michael* Assistant General Counsel Davis Smith* Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, DC 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net davis.smith@nerc.net</p>
<p>Christopher Luras* Manager of Compliance Enforcement Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6887 (801) 883-6894 – facsimile CLuras@wecc.biz</p>	<p>Mark Maher* Chief Executive Officer Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (360) 713-9598 (801) 582-3918 – facsimile Mark@wecc.biz</p>
<p>*Persons to be included on the Commission’s service list are indicated with an asterisk. NERC requests waiver of the Commission’s rules and regulations to permit the inclusion of more than two people on the service list.</p>	<p>Constance White* Vice President of Compliance Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6885 (801) 883-6894 – facsimile CWhite@wecc.biz</p>
	<p>Sandy Mooy* Senior Legal Counsel Western Electricity Coordinating Council 155 North 400 West, Suite 200 Salt Lake City, UT 84103 (801) 883-6857 (801) 883-6894 – facsimile SMooy@wecc.biz</p>

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## Conclusion

Accordingly, NERC respectfully requests that the Commission accept this NOP as compliant with its rules, regulations and orders.

Respectfully submitted,

Gerald W. Cauley  
President and Chief Executive Officer  
David N. Cook  
Sr. Vice President and General Counsel  
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/s/ Rebecca J. Michael  
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cc: Unidentified Registered Entity  
Western Electricity Coordinating Council

Attachments

## **Attachment a**

### **Disposition of Violation**

**DISPOSITION OF VIOLATION<sup>1</sup>**  
Dated July 12, 2010

NERC TRACKING NO.	REGIONAL ENTITY TRACKING NO.	NOC#
WECC200901728	URE_WECC20091906	NOC-485

REGISTERED ENTITY Unidentified Registered Entity (URE)	NERC REGISTRY ID NCRXXXXX
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REGIONAL ENTITY  
Western Electric Coordinating Council (WECC)

**I. VIOLATION INFORMATION**

RELIABILITY STANDARD	REQUIREMENT(S)	SUB-REQUIREMENT(S)	VRF(S)	VSL(S)
CIP-007-1	4		Medium <sup>2</sup>	Lower

PURPOSE OF THE RELIABILITY STANDARD AND TEXT OF RELIABILITY STANDARD AND REQUIREMENT(S)/SUB-REQUIREMENT(S)

**The purpose statement of CIP-007-1 provides in pertinent part: “Standard CIP-007 requires Responsible Entities to define methods, processes, and procedures for securing those systems determined to be Critical Cyber Assets, as well as the non-critical Cyber Assets within the Electronic Security Perimeter(s). Standard CIP-007 should be read as part of a group of standards numbered Standards CIP-002 through CIP-009....”**

**CIP-007-1 R4 provides:**

- R4. Malicious Software Prevention — The Responsible Entity shall use anti-virus software and other malicious software (“malware”) prevention tools, where technically feasible, to detect, prevent, deter, and mitigate the introduction, exposure, and propagation of malware on all Cyber Assets within the Electronic Security Perimeter(s).**

<sup>1</sup> For purposes of this document and attachments hereto, each violation at issue is described as a “violation,” regardless of its procedural posture and whether it was a possible, alleged or confirmed violation.

<sup>2</sup> When NERC filed Violation Risk Factors (VRFs) for CIP-007-1, NERC originally assigned “Lower” VRF to CIP-007-1 R4, R4/1 and R4.2. The Commission approved the VRFs as filed, but directed modifications. On December 19, 2008, NERC filed the modified “Medium” VRFs for CIP-007-1 R4, R4/1 and R4.2 for approval. On February 2, 2009, the Commission issued an Order approving the modified VRFs. Therefore, the “Lower” VRFs were in effect from June 18, 2007, until February 2, 2009, and the “Medium” VRFs for CIP-007-1 R4, R4/1 and R4.2 have been in effect since February 2, 2009.



- R4.1. The Responsible Entity shall document and implement anti-virus and malware prevention tools. In the case where anti-virus software and malware prevention tools are not installed, the Responsible Entity shall document compensating measure(s) applied to mitigate risk exposure or an acceptance of risk.**
- R4.2. The Responsible Entity shall document and implement a process for the update of anti-virus and malware prevention “signatures.” The process must address testing and installing the signatures.**

VIOLATION DESCRIPTION

After being notified that WECC was initiating the semi-annual CIP self-certification process, URE self-reported its noncompliance with CIP-007-1 R4.

URE stated on the Self-Report that URE is working with two software vendors to assess feasibility of adding anti-virus and anti-malware software to workstations that run interface software and network-based video capture devices.

A WECC subject matter expert (SME) conducted two telephone interviews with URE and concluded that URE did not install, or determine technical feasibility of, anti-virus and malware prevention tools on its substation interfaces (three (3) workstations) and thirteen (13) network-based video capture devices used in the physical security systems. The SME determined sixteen (16) of URE’s 328 (4.88%) cyber assets within the Electronic Security Perimeter did not have anti-virus or other malware prevention tools. The SME conducted a follow-up interview and further determined that, based on documentation provided by the video capture device vendor; it is technically feasible to install at least one brand of anti-virus software on the video capture devices.

Enforcement confirmed the SME’s findings in that URE is required to use anti-virus software and other malware prevention tools, where technically feasible, for all Cyber Assets within URE’s Electronic Security Perimeters. Enforcement determined that URE violated CIP-007-1 R4 because it did not: 1) document its decision to implement anti-virus or malware prevention tools, and to document compensating measures, as required by R4.1, on its substation interfaces and 2) install anti-virus and malware prevention tools on its network-based video capture devices.

RELIABILITY IMPACT STATEMENT- POTENTIAL AND ACTUAL

WECC concluded that this violation did not pose a serious or substantial risk to the reliability of the bulk power system (BPS) because URE had secondary detection measures in place; including, but not limited to network-based intrusion detection technologies, procedural and technical controls for access to its Electronic Security

**Perimeters, physical access security, and daily operations monitoring and alerting. Specifically, URE's other measures include:**

- URE uses McAfee virus and malware prevention tools as a corporate standard on all other Windows-based cyber assets across all networks;
- URE has processes in place for testing and updating McAfee virus and malware signatures on those other Windows-based cyber assets across the networks per CIP-007-1 R4.2; and
- In addition, URE has other secondary levels of security in place for the cyber assets that do not have anti-virus installed, which may include one or all of the following: physical access security, network-based intrusion detection technologies, operational monitoring and alerting, and procedural and technical controls for access to the Electronic Security Perimeters including but not limited to network segmentation, firewalls, and two factor authentication.

IS THERE A SETTLEMENT AGREEMENT      YES       NO

WITH RESPECT TO THE VIOLATION(S), REGISTERED ENTITY

NEITHER ADMITS NOR DENIES IT (SETTLEMENT ONLY)      YES   
ADMITS TO IT      YES   
DOES NOT CONTEST IT (INCLUDING WITHIN 30 DAYS)      YES

WITH RESPECT TO THE ASSESSED PENALTY OR SANCTION, REGISTERED ENTITY

ACCEPTS IT/ DOES NOT CONTEST IT      YES

**III.      DISCOVERY INFORMATION**

METHOD OF DISCOVERY

SELF-REPORT   
SELF-CERTIFICATION   
COMPLIANCE AUDIT   
COMPLIANCE VIOLATION INVESTIGATION   
SPOT CHECK   
COMPLAINT   
PERIODIC DATA SUBMITTAL   
EXCEPTION REPORTING

**DURATION DATE(S) July 1, 2009, the effective date of the Standard for Table 1 entities, through April 13, 2010, the date that URE completed its Mitigation Plan**

**DATE DISCOVERED BY OR REPORTED TO REGIONAL ENTITY July 2009**

IS THE VIOLATION STILL OCCURRING

YES  NO

IF YES, EXPLAIN

REMEDIAL ACTION DIRECTIVE ISSUED YES  NO   
 PRE TO POST JUNE 18, 2007 VIOLATION YES  NO

**IV. MITIGATION INFORMATION**

FOR FINAL ACCEPTED MITIGATION PLAN:

MITIGATION PLAN NO. **MIT-08-2308**  
 DATE SUBMITTED TO REGIONAL ENTITY **1/7/2010**  
 DATE ACCEPTED BY REGIONAL ENTITY **2/2/1020**  
 DATE APPROVED BY NERC **2/9/2010**  
 DATE PROVIDED TO FERC **2/9/2010**

IDENTIFY AND EXPLAIN ALL PRIOR VERSIONS THAT WERE ACCEPTED OR REJECTED, IF APPLICABLE

**On July 31, 2009, URE submitted a Mitigation Plan with an expected completion date of September 30, 2009. On November 6, 2009, URE submitted a revised mitigation plan stating that the Mitigation Plan had been completed as of September 30, 2009. To mitigate this violation, URE stated that it had “completed [an] assessment with the vendors and determined it was not technically feasible to apply McAfee virus and malware prevention tools on the three workstations” that run the an interface software. URE also determined that it was not technically feasible to apply McAfee virus and malware prevention tools on the network-based video capture devices. URE documented the results of these assessments.**

**On November 11, 2009, URE submitted a formal Certification of Mitigation Plan Completion, stating that URE completed the Mitigation Plan by September 30, 2009.**

**On December 17, 2009, WECC reviewed the completed Mitigation Plan and determined the plan did not include a provision for installing anti-virus or malware prevention tools on the interface software or video capture devices. URE had provided WECC with a letter from the manufacturer of the video capture devices that stated while it may not be technically feasible to install a certain brand of anti-virus or malware prevention tools, other brands could work. In an email dated December 18, 2009, WECC stated to URE the Mitigation Plan must “allow for the assessment of technical feasibility for installation of any market available anti-virus and malware prevention tool on its cyber assets within the Electronic Security Perimeter.” WECC rejected the completed November 11, 2009 Mitigation Plan on December 17, 2009. URE submitted a revised Mitigation Plan on January 7, 2010 (as shown above).**

MITIGATION PLAN COMPLETED      YES       NO

EXPECTED COMPLETION DATE **5/14/2010**  
EXTENSIONS GRANTED      N/A  
ACTUAL COMPLETION DATE      **4/13/2010**

DATE OF CERTIFICATION LETTER **4/16/2010**  
CERTIFIED COMPLETE BY REGISTERED ENTITY AS OF **4/13/2010**

DATE OF VERIFICATION LETTER **7/12/2010**  
VERIFIED COMPLETE BY REGIONAL ENTITY AS OF **4/13/10**

ACTIONS TAKEN TO MITIGATE THE ISSUE AND PREVENT  
RECURRENCE

**URE completed its assessment of the interface software on the three workstations within the Substations network ESP is completed. The vendor did not recommend installation of virus and malware prevention tools on these computers. Evidence of the vendor's statement was provided to WECC as requested on November 6, 2009.**

**URE completed its assessment and testing of market available virus and malware prevention tools on the 13 digital video recorders (DVRs) on February 19, 2010.**

**URE implemented anti-virus software and malware prevention tools in the form of McAfee antivirus on the 13 DVRs by April 16, 2010.**

LIST OF EVIDENCE REVIEWED BY REGIONAL ENTITY TO EVALUATE  
COMPLETION OF MITIGATION PLAN (FOR CASES IN WHICH  
MITIGATION IS NOT YET COMPLETED, LIST EVIDENCE REVIEWED  
FOR COMPLETED MILESTONES)

- DVR assessment
  - DVR implementation
- (These documents provide evidence that URE has installed McAfee anti-virus software on 14 DVRs to ensure compliance with CIP 007-1 R4)

V. PENALTY INFORMATION

TOTAL ASSESSED PENALTY OR SANCTION OF **\$6,500** FOR ONE VIOLATION OF A RELIABILITY STANDARD.

(1) REGISTERED ENTITY'S COMPLIANCE HISTORY

PRIOR VIOLATIONS OF ANY OF THE INSTANT RELIABILITY STANDARD(S) OR REQUIREMENT(S) THEREUNDER

YES  NO

LIST ANY CONFIRMED OR SETTLED VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

PRIOR VIOLATIONS OF OTHER RELIABILITY STANDARD(S) OR REQUIREMENTS THEREUNDER

YES  NO

LIST ANY PRIOR CONFIRMED OR SETTLED VIOLATIONS AND STATUS

ADDITIONAL COMMENTS

(2) THE DEGREE AND QUALITY OF COOPERATION BY THE REGISTERED ENTITY (IF THE RESPONSE TO FULL COOPERATION IS "NO," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

FULL COOPERATION YES  NO

IF NO, EXPLAIN

(3) THE PRESENCE AND QUALITY OF THE REGISTERED ENTITY'S COMPLIANCE PROGRAM

IS THERE A DOCUMENTED COMPLIANCE PROGRAM

YES  NO

EXPLAIN

**WECC has not assessed URE's compliance program**

EXPLAIN SENIOR MANAGEMENT'S ROLE AND INVOLVEMENT WITH RESPECT TO THE REGISTERED ENTITY'S COMPLIANCE PROGRAM, INCLUDING WHETHER SENIOR MANAGEMENT TAKES ACTIONS THAT SUPPORT THE COMPLIANCE PROGRAM, SUCH AS TRAINING, COMPLIANCE AS A FACTOR IN EMPLOYEE EVALUATIONS, OR OTHERWISE.

**WECC has not assessed URE's compliance program**

(4) ANY ATTEMPT BY THE REGISTERED ENTITY TO CONCEAL THE VIOLATION(S) OR INFORMATION NEEDED TO REVIEW, EVALUATE OR INVESTIGATE THE VIOLATION.

YES  NO   
IF YES, EXPLAIN

(5) ANY EVIDENCE THE VIOLATION(S) WERE INTENTIONAL (IF THE RESPONSE IS "YES," THE ABBREVIATED NOP FORM MAY NOT BE USED.)

YES  NO   
IF YES, EXPLAIN

(6) ANY OTHER MITIGATING FACTORS FOR CONSIDERATION

YES  NO   
IF YES, EXPLAIN

(7) ANY OTHER AGGRAVATING FACTORS FOR CONSIDERATION

YES  NO   
IF YES, EXPLAIN

(8) ANY OTHER EXTENUATING CIRCUMSTANCES

YES  NO   
IF YES, EXPLAIN

EXHIBITS:

SOURCE DOCUMENT  
**URE's Self-Certification**

MITIGATION PLAN  
**URE's Mitigation Plan dated January 7, 2010**

CERTIFICATION BY REGISTERED ENTITY  
**URE's Certification of Completion dated April 16, 2010**

OTHER RELEVANT INFORMATION:

NOTICE OF ALLEGED VIOLATION AND PROPOSED PENALTY OR  
SANCTION ISSUED

DATE: **12/22/2009** OR N/A

SETTLEMENT DISCUSSIONS COMMENCED

DATE: OR N/A

NOTICE OF CONFIRMED VIOLATION ISSUED

DATE: **1/29/2010** OR N/A

SUPPLEMENTAL RECORD INFORMATION

DATE(S) OR N/A

REGISTERED ENTITY RESPONSE CONTESTED

FINDINGS  PENALTY  BOTH  NO CONTEST

HEARING REQUESTED

YES  NO

DATE

OUTCOME

APPEAL REQUESTED