

ATTACHMENT

J.5 CONTINUITY OF OPERATIONS PLAN

Penser North America Inc. employs a multi-faceted plan to protect our data base and to ensure continuity of our operations.

We take many different precautions and do everything we can upfront to avoid disasters and mitigate potential downtime.

Here are some of the key components and precautions we take to protect our data base:

1. Our data base and server is hosted out of Seattle's premiere hosting location, the Fisher Plaza Internap Data Center (http://fisherplaza.com/tech_data_center.html?38415096). This facility has redundant commercial power feeds, redundant network feeds, and a redundant cooling infrastructure. The data is available for any Internet connected device that has the proper security credentials.
2. Our physical server has redundant power supplies, redundant network cards and is protected by a next business day guarantee from Dell to have any hardware malfunction addressed.
3. All claims data is considered essential. Data is backed up nightly and the back up data is held at a secondary site.
4. The data is stored on a Storage Area Network (SAN) and can suffer the catastrophic loss of a hard drive without causing data loss.
5. The server is continuously monitored and failure of key metrics will alert IT staff so that they can immediately begin responding proactively in the event of an alert.

With regard to a potential disaster or an issue that renders our Richland physical office temporarily unable to operate, we have DOE team members working out of our Lacey corporate office. All team members will be involved in the oversight of the DOE account and be familiar with the DOE contract. This team is comprised of certified experienced personnel who will service the DOE claims in an emergent situation immediately until our Richland operations are restored. By having both our data and personnel housed out of more than one location Penser will be able to mitigate any potential downtime in the event of a disaster.

The COOP will be implemented if the physical Richland office and access to data from the Richland area is anticipated to be unavailable for more than one business day. It will be possible to operate under the COOP until operations are re-established in the Richland area.