

September 23, 2009

RE: International ACH Transactions

On September 18, 2009, an amendment to the National Automated Clearing House Association (NACHA) Operating Rules became effective and has the potential to impact U.S. businesses that send or receive ACH transactions. This amendment will require all payments funded internationally or sent to another country via the ACH Network to be identified as International ACH Transactions (IATs). NACHA is responding to a request from the Office of Foreign Asset Control (OFAC) to be able to adequately identify transactions that are international in scope.

U.S. corporations/organizations are required to comply with OFAC obligations and the penalties for ignoring those obligations can be both criminal and civil and include both jail time and fines ranging between \$10,000.00 and \$10,000,000.00 per occurrence depending on the sanctions program that is violated.

You can determine whether or not your organization is impacted by answering the following questions:

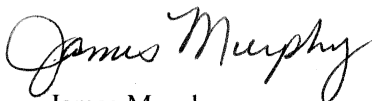
- Is your company a subsidiary of a multi-national company and funds are transferred between the U.S. offices and offices outside the legal jurisdiction of the U.S.?
- Does your company have foreign subsidiaries?
- Does your company send payroll, pension or benefit payments via the ACH Network to individuals that have permanent addresses outside the territorial jurisdiction of the United States?
- Does your company have employees working in countries outside the legal jurisdiction of the U.S. either permanently or on a temporary basis, and you continue to pay them using direct deposit?
- Does your company have retirees who have moved outside the legal jurisdiction of the U.S., either permanently or on a temporary basis, and they are receiving pension or other benefits through direct deposit?
- Is any employee of your organization who receives direct deposit forwarding the funds to a financial institution in another country for any purpose?

If you answered "yes" to any of the above questions, you must notify Columbia EDP Center, Inc. so your files can be formatted as IAT transactions as necessary.

Please read and sign the enclosed declaration of compliance form and return it to us within 30 days of the date of this letter. Thank you for your cooperation.

If you have any questions, please let us know and we will be happy to help. We appreciate your business and look forward to serving you in the future.

Sincerely,



James Murphy
Chairman/CEO

NACHA IAT COMPLIANCE STATEMENT – EMPLOYER

An Amendment to NACHA Operating Rules, effective September 18, 2009, requires all payments funded internationally or sent to another country via the ACH Network to be identified as International ACH Transactions.

If any of the following situations apply to your organization, then you MAY need to originate IAT transactions and must inform Columbia EDP Center, Inc.

Circle “Yes” or “No” to each question below as it relates to your company/organization.

- Yes/No Is your company a subsidiary of a multi-national company and funds are transferred between the U.S. offices and offices outside the legal jurisdiction of the U.S.?
- Yes/No Does your company have foreign subsidiaries?
- Yes/No Does your company send payroll, pension or benefit payments via the ACH Network to individuals that have permanent addresses outside the territorial jurisdiction of the United States?
- Yes/No Does your company have employees working in countries outside the legal jurisdiction of the U.S. either permanently or on a temporary basis, and you continue to pay them using direct deposit?
- Yes/No Does your company have retirees who have moved outside the legal jurisdiction of the U.S., either permanently or on a temporary basis, and they are receiving pension or other benefits through direct deposit?
- Yes/No Is any employee of your organization who receives direct deposit forwarding the funds to a financial institution in another country for any purpose?

If you answered “Yes” to any of the preceding questions you must inform Columbia EDP Center, Inc. so your files can be formatted as an IAT transaction if necessary.

I have read and understand the above paragraph and declare I have been informed by Columbia EDP Center, Inc. of my obligation to comply with the NACHA rules regarding IAT transactions. I also declare that our company/organization is in compliance.

Signed _____
(Owner/Principal)

Date _____

Printed _____

Company/Organization _____