Buckley Sandler LLP

InfoBytes

FINANCIAL SERVICE HEADLINES & DEADLINES FOR OUR CLIENTS AND FRIENDS

June 21, 2013

TOPICS COVERED THIS WEEK (CLICK TO VIEW)

FEDERAL ISSUES

CFPB Teams With Boston to Field Consumer Complaints. On June 18, the CFPB announced a partnership with the City of Boston to provide local residents access to the CFPB's consumer complaint hotline through the city's existing constituent service hotline. Boston residents who call the city hotline with a question or complaint about consumer financial products or services will be transferred directly to the CFPB for assistance.

SEC Plans to Alter Policy on Seeking Admissions. On June 18, numerous media outlets reported that SEC Chair Mary Jo White indicated that the SEC will shift its policy toward extracting admissions from parties facing allegations of wrongdoing as a condition of resolving those allegations. While a majority of cases likely still will be settled under the current "neither admit nor deny" rubric, the SEC will seek admissions in cases that meet certain criteria, which likely will include "widespread harm to investors." The shift would extend a policy adopted last year by then-SEC Enforcement Director Robert Khuzami to no longer allow defendants who are convicted of or admit guilt with regard to criminal charges to neither admit nor deny the parallel civil liability. The SEC now may seek an admission even where there is no criminal finding or admission. This change follows increasing pressure from members of Congress on federal regulators and law enforcement authorities to more vigorously pursue allegations of wrongdoing by financial institutions, including, most recently, an inquiry by Senator Elizabeth Warren (D-MA) as to whether the SEC and other agencies have conducted any internal research or analysis on trade-offs to the public between settling an enforcement action without admission of guilt and going forward with litigation to obtain a judicial finding of unlawful conduct.

National Mortgage Settlement Monitor Identifies Few Servicing Violations. On June 19, the National Mortgage Settlement Monitor, Joseph A. Smith, Jr., released summaries of the mortgage servicing compliance reports he submitted to U.S. District Court Judge Rosemary Collyer - the judge presiding over the consent judgments that constitute the National Mortgage Settlement. The summaries indicate that the five servicers subject to the national agreement were largely compliant

with the agreement's mortgage servicing requirements and currently are taking actions to address certain potential violations. Still, the Monitor stated that consumer and state attorney general complaints indicated that some issues may remain with regard to the loan modification process, single points of contact, and billing and statement inaccuracies, and that he is negotiating more stringent testing with the banks to address these issues.

HUD Proposes Expansion of Mortgagee Evaluation System, Clarifies Good Neighbor Sales Program Rules. On June 12, HUD proposed in Mortgagee Letter 2013-21 revisions to the system used by the FHA to measure and inform mortgagees of their loss mitigation performance. The proposed revisions involve more comprehensive metrics to evaluate mortgagees on their overall performance with regard to delinquent loan servicing, as opposed to the limited review of default reporting of forbearance actions and loss mitigation and foreclosure claims paid under the current system. HUD is seeking comments on the proposal, which are due by July 12, 2013. Also on June 12, HUD issued Mortgagee Letter 2013-20 to clarify that under its Good Neighbor Next Door Sales Program, which enables eligible participants to purchase at a discount certain designated properties, (i) the mortgage insurance premium is based on the first mortgage only and (ii) the process for submitting requests for an interruption in the owner-occupancy term.

Fannie Mae Updates Short Sale Requirements, Issues Servicing Clarifications and Reminders. On June 19, Fannie Mae issued Servicing Guide Announcement SVC-2013-13, which describes policy changes related to its standard short sale requirements, including (i) the multiple listing service requirements, (ii) credit report seasoning, and (iii) streamlined documentation requirements for transition from standard short sale to standard deed-in-lieu of foreclosure. With regard to standard deeds-in-lieu of foreclosure, the announcement addresses (i) property inspection requirements, (ii) REOgram® and subordinate lien release submission requirements, and (iii) title insurance requirements. In a Servicing Notice issued the same day, Fannie Mae clarified its policies related to (i) "full file" reporting to credit repositories, (ii) certain income documentation requirements, and (iii) liquidation reporting requirements for standard short sales and deeds-in-lieu of foreclosure.

Freddie Mac Announces Numerous Servicing Requirements. On June 14, Freddie Mac issued Bulletin 2013-10 to announce servicing policy changes with regard to Hurricane Sandy, foreclosure and alternatives to foreclosure, and other servicing issues. The Bulletin announces that servicers must submit any Hurricane Sandy exterior property inspection reimbursements by September 16, 2013, using a new template included in the Bulletin. Regarding foreclosures, the Bulletin, among other things, (i) sets the parameters under which servicers may utilize bulk trial foreclosures as an alternative foreclosure process in Florida, (ii) updates requirements for requests related to the preservation of deficiency rights, (iii) revises FICO score seasoning requirements for standard short sales and deeds-in-lieu of foreclosure (DILs), (iv) revises property inspection and closing requirements for DILs and adds a MLS requirement for short sales, and (v) removes, in most instances, the requirement that a servicer obtain a copy of a borrower's tax transcript or most recent signed federal income tax return to be evaluated for HAMP. Among numerous other servicing policy updates, the Bulletin also (i) specifies that Freddie Mac does not reimburse for credit reports obtained in servicing activities, and (ii) requires servicers to notify Freddie Mac within 24 hours of blocking or rejecting a mortgage or mortgage transaction based on a valid match to the OFAC list of Specially Designated Nationals and Blocked Persons.

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OCC Issues Semiannual Risk Report, Highlights Cyber Security and Anti-Money Laundering Risk. On June 18, the OCC released its Semiannual Risk Perspective, which assesses risks facing national banks and federal savings associations with regard to: (i) the operating environment, (ii) condition and performance of the banking system, (iii) funding, liquidity, and interest rate risk, and (iv) regulatory actions. Among the many issues reviewed in the report, the OCC noted that cyber threats continue to grow in sophistication and require heightened awareness and appropriate resources to identify and mitigate the associated risks. It also stated that BSA/AML threats are increasing as a result of changing methods of money laundering and an increase in the volume and sophistication of electronic banking fraud, while compliance programs are failing to evolve or incorporate appropriate controls into new products and services.

FDIC Announces Senior Personnel Changes. On June 17, the FDIC announced that Arthur J. Murton will replace James Wigand, Director of the Office of Complex Financial Institutions, who plans to retire. Mr. Murton most recently served as the Director of the Division of Insurance and Research where he has been responsible for, among other things, leading the agency's efforts in assessing economic and financial sector risks to the banking industry, developing and overseeing risk-based deposit insurance pricing and overall insurance fund management, and overseeing the collection and publication of bank financial information. Diane Ellis will serve as the new Director of the Division of Insurance and Research, where she currently serves as Deputy Director for Financial Risk Management and Research.

FTC Chairwoman Announces Senior Personnel Changes. On June 17, FTC Chairwoman Edith Ramirez named several senior staff members, including Jessica Rich as Director of the Bureau of Consumer Protection. Ms. Rich has been with the FTC for more than 20 years and most recently served as Associate Director of the Division of Financial Practices. Prior to that, Ms. Rich was a Deputy Director of the Bureau and has served as the Acting Associate Director and Assistant Director of the Bureau's Division of Privacy and Identity Protection, among numerous other positions. Ms. Ramirez also named Jonathan E. Nuechterlein as General Counsel. He joins the agency from a large law firm, where he was a partner and chair of the firm's communications, privacy, and Internet law practice group. He previously was Deputy General Counsel for the FCC and an Assistant to the Solicitor General at the U.S. Department of Justice.

STATE ISSUES

New York Signals Crackdown on Bank Consultants with Substantial Fine, Temporary Ban. On June 18, New York announced an agreement with a bank consulting firm in connection with the firm's work for a state-regulated bank alleged to have engaged in deceptive and fraudulent misconduct on behalf of client Iranian financial institutions in violation of anti-money laundering and sanctions rules. An investigation conducted by the New York Department of Financial Services (DFS) found that the consultant (i) failed to demonstrate autonomy and removed a recommendation aimed at rooting out money laundering from a written final report submitted to the DFS, and (ii) violated New York Banking Law § 36.10 by disclosing confidential information of other consulting firm clients to the bank. To resolve that investigation, the consulting firm agreed to (i) a voluntary one-year suspension from consulting work at any DFS-regulated institution, (ii) pay a $10 million penalty, and (iii) adopt a new code of conduct. The DFS intends for the code of conduct to serve as "a new model that will govern independent consulting firms that seek to be retained or approved by

DFS." The code of conduct states, among other things: (i) the financial institution and consultant must disclose all prior work by the consultant for the institution in the previous three years, (ii) the engagement letter must require that the ultimate conclusions and judgments will be that of the consultant based upon the exercise of its own judgment, (iii) the consultant and institution must submit a work plan for the engagement and timeline for completion of work, (iv) the DFS and the consultant must have ongoing communication, including outside the presence of the institution, and (v) the consultant must implement numerous record keeping, training, reporting, and other policies and procedures.

New York Announces Agreement to Resolve Alleged International Sanctions Violations. On June 20, New York announced a consent order with the New York branch of a foreign bank to resolve charges that the bank - over a five year period that ended more than five years ago - violated Bank Secrecy Act, Anti-Money Laundering and international sanctions rules by stripping from wire transfer messages information that could have been used to identify government and privately owned entities in Iran, Sudan, and Myanmar, and entities on the Specially Designated Nationals list issued by the OFAC and moving billions of dollars through New York on their behalf. The order requires the bank to pay a $250 million penalty, conduct a compliance review, and revise written compliance and management oversight plans. The compliance review must be conducted by an independent consultant that will be subject to the new DFS code of conduct for bank consultants described in the InfoByte above. This is at least the second time in the last year that New York has taken a major action against a domestic branch of a foreign bank related to money laundering and international sanctions violations. In a previous instance, federal authorities followed with substantial civil and criminal penalties related to the same conduct.

Connecticut Expands Foreclosure Mediation Program. On June 18, Connecticut enacted HB 6355, which expands the state's existing foreclosure mediation program and adds new mortgagee requirements. Specifically, the bill extends the foreclosure mediation program to (i) cover the disposition of property through means other than foreclosure, including short sales and deeds-in-lieu of foreclosure, and (ii) foreclosure actions with return dates of July 1, 2008 through June 30, 2009. The bill also, among other things, (i) establishes a pre-mediation process, (ii) requires mortgagees to provide to a borrower a complete financial package in connection with a request for a foreclosure alternative and provide to a mediator and the borrower an account history and related information after receiving notification that the case has been assigned to mediation, and (iii) establishes expedited foreclosure procedures for vacant and abandoned properties. The bill becomes effective on July 15, 2013.

North Carolina Increases Maximum Installment Loan Rates, Adds Servicemember Protections. On June 20, North Carolina enacted SB 489 to increase from $10,000 to $15,000 the maximum installment loan amount, and to increase the maximum allowable interest rates on installment loans. Under the new tiered rate structure, effective July 1, 2013, lenders may charge 30 percent on loans up to $4,000, 24 percent on loans $4,000 to $8,000, and 18 percent on loans $8,000 to $15,000. The bill also (i) extends the allowable terms of such loans to 96 months, (ii) allows lenders to charge late and deferral fees, and (iii) adds new protections for military servicemembers.

Massachusetts Finalizes Foreclosure Regulations. This week, the Massachusetts Division of Banks adopted revised foreclosure and mortgage modification regulations. The amendments implement a 2012 law that makes it harder to foreclose in that state, including by creating a pre-foreclosure modification notice requirement for creditors. The amended regulations (i) establish the processes for a borrower and creditor with regard to the borrower's right to request a loan modification, (ii) establish the actions that constitute a borrower's good faith response to a creditor's notice of the right to request a loan modification, (iii) define good faith efforts by creditors to avoid

foreclosure, and (iv) establish safe harbors for creditors that comply with the loan modification process. The new regulations take effect on June 21, 2013 and must be implemented by September 18, 2013.

Texas Enacts Stringent Email Privacy Bill. On June 14, Texas enacted HB 2268, which amends current state law relating to "search warrants issued in [that] state and other states for certain customer data, communications, and other related information held in electronic storage" by "electronic communications services and remote computing services" providers. Among other things, the bill requires law enforcement to obtain a warrant to search emails, regardless of the age of the emails. The requirement exceeds the privacy protections granted by the federal Electronic Communications Privacy Act, which allows warrantless searches of emails left unopened for 180 days.

COURTS

U.S. Supreme Court Agrees to Hear Challenge to Disparate Impact Analysis Under the Fair Housing Act. On June 17, the U.S. Supreme Court granted certiorari in *Township of Mount Holly, New Jersey, v. Mt. Holly Gardens Citizens in Action, Inc.,* No. 11-1507, to address one of two questions presented in a petition from the Township of Mount Holly -- specifically the threshold question of whether disparate impact claims are cognizable under the FHA. Though not a lending case, the case could offer the Supreme Court its first opportunity to rule on the issue of whether the FHA permits plaintiffs to bring claims under a disparate impact theory. However, the question before the Court is whether disparate impact claims are cognizable under Section 804 of the FHA. Depending on the Court's analysis, the question of whether Section 805 of the FHA -- the section specifically applicable to mortgage financing -- permits disparate impact claims may remain an open issue. Because the parties in the Mt. Holly case have been involved in well-publicized settlement meetings, the prospect exists that this matter may also be resolved prior to the Court having a chance to determine the question it has certified for review. For additional information about these developments, please see our Special Alert.

U.S. Supreme Court Holds FAA Permits Class Arbitration Waivers. On June 20, the U.S. Supreme Court held that the Federal Arbitration Act (FAA) does not permit courts to invalidate a class arbitration waiver "on the ground that the plaintiff's cost of individually arbitrating a federal statutory claim exceeds the potential recovery." *American Express Co. v. Italian Colors Restaurant*, 570 U.S. ___ (2013). The Court reversed a Second Circuit decision that held that because the costs for the individual plaintiff to arbitrate its claims would be prohibitive, the class action waiver was unenforceable and arbitration could not proceed. The Court explained that the Second Circuit's "effective vindication" doctrine is a judge-made exception to the FAA that "finds its origin in the desire to prevent 'prospective waiver of a party's *right to pursue* statutory remedies,'. . . [b]ut the fact that it is not worth the expense involved in *proving* a statutory remedy does not constitute the elimination of the *right to pursue* that remedy." The Court added that there is no congressional command to reject the waiver of class arbitration, and that congressional approval of Rule 23 does not establish an entitlement to class proceedings for the vindication of statutory rights.

MISCELLANY

U.K. Parliamentary Commission Report Offers Comprehensive Bank Governance Reforms. On June 19, the U.K. Parliamentary Commission on Banking Standards published a report titled "Changing Banking for Good." The Commission, established in July 2012 after the alleged rigging of LIBOR was revealed, was tasked "to conduct an inquiry into professional standards and culture in

the UK banking sector and to make recommendations for legislative and other action." The report covers a broad range of banking sector issues, but focuses on the impacts of a perceived misalignment of incentives in banking. Some of the key recommendations include: (i) establishing a new regime to ensure that the most important responsibilities within banks are assigned to specific, senior individuals so they can be held fully accountable for their decisions and the standards of their banks ; (ii) creating a new licensing regime underpinned by Banking Standards Rules; (iii) creating a new criminal offense of reckless misconduct in the management of a bank for senior bank officers; (iv) adopting a new remuneration code to better align risks taken and rewards received that would also defer more remuneration for a longer period of time; and (v) giving the bank regulator a new power to cancel all outstanding deferred remuneration for senior bank employees in the event their banks require taxpayer support.

Nevada Locality Latest to Explore Use of Eminent Domain to Seize Mortgages. On June 19, the city council of North Las Vegas, Nevada, reportedly voted to explore the potential use of the government's eminent domain powers to seize underwater mortgages from trusts, write down the loan principal, and re-sell the altered mortgages to new investors. In January, a California county that had threatened such a course voted to abandon the concept. Since then, several other California cities have signed agreements with a third-party to explore the issue, with North Las Vegas now deciding to pursue a similar path. To date, however, no locality has taken the next step to implement a mortgage seizure plan.

FIRM NEWS

Andrew L. Sandler will participate in the Stafford webinar, Bank Enforcement Actions: New Issues, Higher Penalties, Joint Enforcement Actionsbeing held on Thursday, July 18, 2013, from 1:00 pm to 2:30 PM EDT.

Jonice Gray Tucker will speak at the Thomson Reuters workshop, Preparing for a CFPB Examination in Washington, DC on August 1, 2013.

Jonice Gray Tucker will moderate a Regulatory "Super Session" at the California Mortgage Bankers Association's Western States Loan Servicing Conference on August 4, 2013, in Las Vegas, Nevada. The panel will focus the changing regulatory landscape for mortgage servicers and practical tips for compliance.

Jonice Gray Tucker will moderate a panel at the American Bar Association Annual Meeting entitled: Knowing is Half the Battle: The CFPB's Mortgage Rules, HUD's Disparate Impact Rule, and More. Speakers will include BuckleySandler partner Joseph Reilly, David Berenbaum (NCRC), Ken Markison (MBA), and David Stein (Promontory). The panel will be held on August 10, 2013, in San Francisco, CA

Donna Wilson will speak at ACI's 12th National Forum on Residential Mortgage Litigation and Regulatory Enforcement, on September 26, 2013 in Dallas, TX. Ms. Wilson's panel is titled, "Responding to Stepped Up Litigation and Enforcement Being Brought at the State Level, With an Emphasis on California, Florida, New York, Illinois, Texas, and Nevada."

Thomas Sporkin will participate on a panel on whistleblowers at the American Bar Association's Securities Fraud 2013 Conference in New Orleans, LA, October 24-25, 2013.

FIRM PUBLICATIONS

Benjamin Saul, Valerie Hletko, Liana Prieto, and Shara Chang published the Fair Lending Litigation chapter in *Litigation Services Handbook: The Role of the Financial Expert*, 2013 Cumulative Supplement (5th Edition).

Jeremiah Buckley authored "Help the Fed Get Out of the Mortgage Business" for American Banker on May 7, 2013.

Benjamin Saul published "Private Student Lenders and Servicers Face CFPB Scrutiny," on May 20, 2013, in the Westlaw Journal of Bank & Lender Liability.

Benjamin Klubes, Michelle Rogers, and Katherine Halliday published "HAMP Risk on the Rise: A Complicated Regulatory Scheme Under the Spotlight," on June 5, 2013 in Bloomberg Law.

About BuckleySandler LLP (www.buckleysandler.com)

With nearly 150 lawyers in Washington, New York, Los Angeles, and Orange County, BuckleySandler provides best-in-class legal counsel to meet the challenges of its financial services industry and other corporate and individual clients across the full range of government enforcement actions, complex and class action litigation, and transactional, regulatory, and public policy issues. The Firm represents many of the nation's leading financial services institutions. "The best at what they do in the country." (Chambers USA).

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New York: 1133 Avenue of the Americas, Suite 3100, New York, NY 10036, (212) 600-2400
Los Angeles: 100 Wilshire Boulevard, Suite 1000, Santa Monica, CA 90401, (310) 424-3900
Orange County: 3121 Michelson Drive, Suite 210, Irvine, CA 92612, (949)398-1360

We welcome reader comments and suggestions regarding issues or items of interest to be covered in future editions of InfoBytes. Email infobytes@buckleysandler.com.

In addition, please feel free to email our attorneys. A list of attorneys can be found here.

For back issues of InfoBytes, please see: http://www.buckleysandler.com/infobytes/infobytes.

MORTGAGES

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BANKING

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U.K. Parliamentary Commission Report Offers Comprehensive Bank Governance Reforms. On June 19, the U.K. Parliamentary Commission on Banking Standards published a report titled "Changing Banking for Good." The Commission, established in July 2012 after the alleged rigging of LIBOR was revealed, was tasked "to conduct an inquiry into professional standards and culture in the UK banking sector and to make recommendations for legislative and other action." The report covers a broad range of banking sector issues, but focuses on the impacts of a perceived misalignment of incentives in banking. Some of the key recommendations include: (i) establishing a new regime to ensure that the most important responsibilities within banks are assigned to specific, senior individuals so they can be held fully accountable for their decisions and the standards of their banks ; (ii) creating a new licensing regime underpinned by Banking Standards Rules; (iii) creating a new criminal offense of reckless misconduct in the management of a bank for senior bank officers; (iv) adopting a new remuneration code to better align risks taken and rewards received that would also defer more remuneration for a longer period of time; and (v) giving the bank regulator a new power to cancel all outstanding deferred remuneration for senior bank employees in the event their banks require taxpayer support.

CONSUMER FINANCE

U.S. Supreme Court Holds FAA Permits Class Arbitration Waivers. On June 20, the U.S. Supreme Court held that the Federal Arbitration Act (FAA) does not permit courts to invalidate a class arbitration waiver "on the ground that the plaintiff's cost of individually arbitrating a federal statutory claim exceeds the potential recovery." *American Express Co. v. Italian Colors Restaurant*, 570 U.S. ___ (2013). The Court reversed a Second Circuit decision that held that because the costs for the individual plaintiff to arbitrate its claims would be prohibitive, the class action waiver was unenforceable and arbitration could not proceed. The Court explained that the Second Circuit's "effective vindication" doctrine is a judge-made exception to the FAA that "finds its origin in the desire to prevent 'prospective waiver of a party's *right to pursue* statutory remedies,'. . . [b]ut the fact that it is not worth the expense involved in *proving* a statutory remedy does not constitute the elimination of the *right to pursue* that remedy." The Court added that there is no congressional command to reject the waiver of class arbitration, and that congressional approval of Rule 23 does not establish an entitlement to class proceedings for the vindication of statutory rights.

CFPB Teams With Boston to Field Consumer Complaints. On June 18, the CFPB announced a partnership with the City of Boston to provide local residents access to the CFPB's consumer complaint hotline through the city's existing constituent service hotline. Boston residents who call the city hotline with a question or complaint about consumer financial products or services will be transferred directly to the CFPB for assistance.

FTC Chairwoman Announces Senior Personnel Changes. On June 17, FTC Chairwoman Edith Ramirez named several senior staff members, including Jessica Rich as Director of the Bureau of Consumer Protection. Ms. Rich has been with the FTC for more than 20 years and most recently served as Associate Director of the Division of Financial Practices. Prior to that, Ms. Rich was a Deputy Director of the Bureau and has served as the Acting Associate Director and Assistant Director of the Bureau's Division of Privacy and Identity Protection, among numerous other

positions. Ms. Ramirez also named Jonathan E. Nuechterlein as General Counsel. He joins the agency from a large law firm, where he was a partner and chair of the firm's communications, privacy, and Internet law practice group. He previously was Deputy General Counsel for the FCC and an Assistant to the Solicitor General at the U.S. Department of Justice.

North Carolina Increases Maximum Installment Loan Rates, Adds Servicemember Protections. On June 20, North Carolina enacted SB 489 to increase from $10,000 to $15,000 the maximum installment loan amount, and to increase the maximum allowable interest rates on installment loans. Under the new tiered rate structure, effective July 1, 2013, lenders may charge 30 percent on loans up to $4,000, 24 percent on loans $4,000 to $8,000, and 18 percent on loans $8,000 to $15,000. The bill also (i) extends the allowable terms of such loans to 96 months, (ii) allows lenders to charge late and deferral fees, and (iii) adds new protections for military servicemembers.

SECURITIES

SEC Plans to Alter Policy on Seeking Admissions. On June 18, numerous media outlets reported that SEC Chair Mary Jo White indicated that the SEC will shift its policy toward extracting admissions from parties facing allegations of wrongdoing as a condition of resolving those allegations. While a majority of cases likely still will be settled under the current "neither admit nor deny" rubric, the SEC will seek admissions in cases that meet certain criteria, which likely will include "widespread harm to investors." The shift would extend a policy adopted last year by then-SEC Enforcement Director Robert Khuzami to no longer allow defendants who are convicted of or admit guilt with regard to criminal charges to neither admit nor deny the parallel civil liability. The SEC now may seek an admission even where there is no criminal finding or admission. This change follows increasing pressure from members of Congress on federal regulators and law enforcement authorities to more vigorously pursue allegations of wrongdoing by financial institutions, including, most recently, an inquiry by Senator Elizabeth Warren (D-MA) as to whether the SEC and other agencies have conducted any internal research or analysis on trade-offs to the public between settling an enforcement action without admission of guilt and going forward with litigation to obtain a judicial finding of unlawful conduct.

PRIVACY/DATA SECURITY

Texas Enacts Stringent Email Privacy Bill. On June 14, Texas enacted HB 2268, which amends current state law relating to "search warrants issued in [that] state and other states for certain customer data, communications, and other related information held in electronic storage" by "electronic communications services and remote computing services" providers. Among other things, the bill requires law enforcement to obtain a warrant to search emails, regardless of the age of the emails. The requirement exceeds the privacy protections granted by the federal Electronic Communications Privacy Act, which allows warrantless searches of emails left unopened for 180 days.

We welcome reader comments and suggestions regarding issues or items of interest to be covered in future editions of InfoBytes.
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