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OFFICE OF THE SECRETARIAT

COMMENT

July 29, 1998

Jean A. Webb, Secretary
 Commodity Futures Trading Commission
 Three Lafayette Centre
 1155 21st Street, NW
 Washington, DC 20581

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 COMMODITY FUTURES
 TRADING COMMISSION
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Dear Ms. Webb,

Microsystems, Inc. wishes to comment on the CFTC's proposed amendment:
 Recordkeeping Requirements - Expanded Use of Micrographic and Electronic Storage
 Media, dated June 1, 1998.

Microsystems, Inc. has been in the records management industry since 1957. Several changes have taken place in this industry, but none with greater impact than that of Electronic Document Imaging (EDI). For the past 4 years we have been converting our customers records (hand written & text) to electronic media, such as CD ROM. This conversion process, in some cases, has replaced the need for our clients to use microfilm or off-site storage as the solution to their records management concerns.

The Commissions' current position, as it relates to Trading Cards and Written Customer Orders, does not seem fair to those companies who would like to consolidate all of their records (electronic and hand written / text) into an easy to use retrieval system and take advantage of today's technology. Two negative aspects of storage and handling paper documents are the possibility of losing records and costs to perform an audit of a particular trade or series of trades.

Using an Electronic Document Imaging system would eliminate costly audits of trades and of lost records. Documents could be reproduced in minutes rather than in days.



Microsystems agrees with the Commission in regards to their security/integrity concerns. The software used in this type of a conversion process should be capable of providing standard images (TIFF Group 4 as an example) and databases in an easy to read format (i.e. ASCII). Also, audit trails, tracking the conversion and retrieval processes should be inherent in the software. The media of choice should be that of a WORM (Write Once Read Many) technology. Once the document has been burned into a media, it becomes a permanent record - unable to be manipulated. Non-rewritable CD-ROM's perform this task very adequately.

Enclosed please find a document that Microsystems, Inc. created. Also please find a floppy disk which contains this document in an electronic format (TIFF Group 4 file). You can use a product called Imaging in a Windows 95 operating system to open this file and make a printout of the document. We've enclosed a printout to show the Commission that a copy of a document scanned into an electronic file is of high quality, and can take the place of an original.

Thank you for allowing Microsystems, Inc. to comment. If you should have any questions, please don't hesitate to call me at 847-205-1986 or fax us at 847-205-5386.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick A. Healy".

Patrick A. Healy
Microsystems, Inc.

July 29, 1998

Sample document created by Microsystems, Inc. with text and hand written information.

The point of this demonstration is to convince the Commission that a text or hand written document scanned and captured onto a non-rewritable media such as a CD-ROM, once reproduced, can take the place of the original document. Certain security/integrity issues do need to be, and can be followed with today's technology. Borrowing from the Commissions own discussion on page 2 of 13, "The Commission anticipates that this change will permit the type of simplification and streamlining of recordkeeping systems likely to result in both a reduction in costs and improvements in system reliability". Our customers have indeed experienced just that!


Microsystems, Inc.

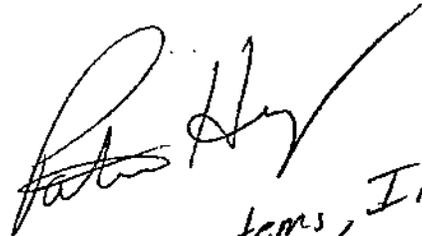
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July 29, 1998

Sample document created by Microsystems, Inc. with text and hand written information.

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