Bureau of Competition Production Guide

An eDiscovery Resource

This guide explains what the Bureau of Competition generally requires when we send a formal request, such as a Request for Additional Information or a Civil Investigative Demand. The suggested formats are based on our experience with many different submissions; follow them to organize your submission and minimize the chance of incompatibility with our processes and systems.

This resource is intended as guidance and does not supersede instructions in any request or subpoena issued by the Bureau. We continue to streamline the production process, so contact the staff person identified in the formal request to discuss any specific issues you may have with collecting, formatting, or submitting documents.

1.   Getting Started: Protocols for All Submissions

Before processing documents in response to a formal request, please note: The following protocols apply to ALL formats submitted to the Bureau of Competition. The Bureau has additional requirements pertaining to metadata, format, etc., for certain types of documents. See Preparing Collections for details.

a.   Concordance Version and Load Files

The Bureau of Competition uses LexisNexis® Concordance® v 10.011. With the production, you must submit:

- an image load file containing a line for every image file in the production, and
- a delimited data load file containing a line for every document in the production.

b.   Virus Scanning

All electronic documents and production media shall be scanned and free of viruses prior to shipping to the Bureau. The Bureau will request replacement for any infected media, **which may affect the timing of your compliance with the Bureau's request.**

c.   Extracted Text / OCR

Submit text:
- as document-level text files,
- named for the beginning Bates number, and
- organized into a folder separate from images.

We prefer not to receive Unicode text files unless absolutely necessary.

d.   Deduplication

You must have the approval of the Bureau representative to globally de-dupe or to apply email threading. You do not need prior Bureau approval to deduplicate within a custodian's document set.

e.   Labeling & Numbering Files

For image file names, bates numbers and document identification numbers (Doc IDs), use a consistent number of numerals to prevent issues with image display, using leading zeros where necessary. Do not use a space to separate the prefix from numbers.

Acceptable formats (as long as you are consistent)
- ABC-0001
- ABC0001

Unacceptable format
- ABC 0001

f.   Recommended Delimiters

We strongly recommend using these delimiters in delimited data load files:

Description	Symbol	ASCII Character
Field Separator		20
Quote Character	Þ	254
Newline	®	174
Multiple field entries	;	059

g.   Image Files

We accept images files that are:

Black and White: 300 DPI, Group IV Tiff
Color: Jpeg files or PDF files, submitted as linked native file

h.   Date & Time Format

Submit date and time data in separate fields so Concordance can load it.

**2.	Preparing Collections**

**a.	Preparing Scanned Documents**

Preferred Format: Submit TIFF images with OCR text

Metadata & Other Information Requirements

Include the following metadata fields and information in the delimited data load file. Alongside each piece of information, we have recommended a corresponding field name for the delimited data load file.

Document Info / Metadata	Description	Concordance Field Name
Beginning Bates number	The beginning bates number for the document	BEGBATES
Ending Bates number	The ending bates number for the document	ENDBATES
Page Count	The total number of pages in the document	PGCOUNT
Custodian	Mailbox where the email resided	CUSTODIAN

b. Preparing Email & Attachments

Preferred Format

Email: Submit TIFF images with extracted text of email

Attachments:
- Submit Microsoft **Excel** and **PowerPoint** files in native format with extracted text and metadata.
- Submit Microsoft **Access** files and other **multimedia files** in native format with *metadata only*.
- Submit other files and attachments as images with extracted text and metadata.

Metadata & Other Information Requirements

- Preserve the parent/child relationship in email by including a reference to all attachments.
- Produce attachments as separate documents and number them consecutively to the parent email.
- Include the following metadata fields and information in the delimited data load file. Alongside each piece of information, we have recommended a corresponding field name for the delimited data load file.

Metadata for Emails

Document Info / Metadata	Description	Concordance Field Name
Beginning Bates number	The beginning bates number for the document	BEGBATES
Ending Bates number	The ending bates number for the document	ENDBATES
Page Count	The total number of pages in the document	PGCOUNT
Custodian	Mailbox where the email resided	CUSTODIAN
To	Recipient(s) of the email	RECIPIENT
From	The person who authored the email	FROM
CC	Person(s) copied on the email	CC
BCC	Person(s) blind copied on the email	BCC
Date Sent	Date the email was sent	DATESENT
Time Sent	Time the email was sent	TIMESENT
Subject	Subject line of email	SUBJECT
Date Received	Date the email was received	DATERCVD
Time Received	Time the email was received	TIMERCVD
Child records (attachments)	The beginning bates number(s) of attachments delimited by comma	ATTACHMENTID

Location or "Path"	Location of email in personal folders/Deleted Items/Sent Items	FILEPATH
Message ID	MS Outlook Message ID or similar number in other message systems	MESSAGEID

Metadata for Attachments

Document Info / Metadata	Description	Concordance Field Name
Beginning Bates number	The beginning bates number for the document	BEGBATES
Ending Bates number	The ending bates number for the document	ENDBATES
Page Count	The total number of pages in the document	PGCOUNT
Custodian	The name of the original custodian of the file	CUSTODIAN
Parent Record	Beginning bates number of parent email	PARENTID
Creation Date	The date attachment was saved at the location on the electronic media for the first time	CREATEDATE
Creation Time	The time the attachment was saved at the location on the electronic media for the first time	CREATETIME
Modified Date	The date/time the attachment was last changed, and then saved	MODDATE
Modified Time	The time the attachment was last changed, and then saved	MODTIME
Size	The amount of space the file takes up on the electronic media. Usually recorded in kilobytes, however may be reported in single bytes	FILESIZE
File Name	The name of the attachment including the extension denoting the application in which the file was created	FILENAME
Production Link	Relative path of submitted native files such as Excel spreadsheets	NATIVELINK
Hash	The SHA (Secure Hash Algorithm) for the original native file if available	HASH

c.   Preparing Native Files

Preferred Format
a. Submit Microsoft **Excel**, and **PowerPoint** files in native format with extracted text and metadata.
b. Submit Microsoft **Access** and **other multimedia** files in native format with *metadata only*.
c. Submit other files and attachments as images with extracted text and metadata.

Metadata & Other Information Requirements

Include the following metadata fields and information in the delimited data load file. Alongside each piece of information, we have recommended a corresponding field name for the delimited data load file.

Metadata and other information requirements for native files

Document Info / Metadata	Description	Concordance Field Name
Beginning Bates number	The beginning bates number for the document	BEGBATES
Ending Bates number	The ending bates number for the document	ENDBATES
Page Count	The total number of pages in the document	PGCOUNT
Custodian	The name of the original custodian of the file	CUSTODIAN
Creation Date	The date attachment was saved at the location on the electronic media for the first time	CREATEDATE
Creation Time	The time the attachment was saved at the location on the electronic media for the first time	CREATETIME
Modified Date	The date/time the attachment was last changed, and then saved	MODDATE
Modified Time	The time the attachment was last changed, and then saved	MODTIME
Size	The amount of space the file takes up on the electronic media. Usually recorded in kilobytes	FILESIZE
File Name	The name of the file including the extension denoting the application in which the file was created	FILENAME
Originating Path	File path of the file as it resided in its original environment.	FILEPATH
Production Link	Relative path to production media of submitted native files. Example: FTC-001\NATIVE\001\FTC-0003090.xls	NATIVELINK
Hash	The SHA (Secure Hash Algorithm) for the original native file if available	HASH

3. Submitting Your Production

Once you have prepared documents according to this guide, follow these instructions to submit them to the Bureau of Competition.

a. Encryption

Encryption of productions using NIST FIPS-Compliant cryptographic hardware or software modules is strongly encouraged.[1]

For larger productions, we encourage you to use encrypted hardware instead of software modules.

Passwords should always be emailed to the FTC contact. Additionally, please also include information on the method of encryption.

b. Media We Accept

Submit any of the following:

- For Productions *under* 10 gigabytes:
  - o CD-R CD-ROM optical disks formatted to ISO 9660 specifications
  - o DVD-ROM optical disks for Windows-compatible personal computers
  - o USB 2.0 flash drives

- For Productions *over* 10 gigabytes
  - o IDE, EIDE and SATA hard disk drives, formatted in Windows-compatible, uncompressed data in a USB 2.0 external enclosure
  - o USB 2.0 flash drives

Alternatively,

- For Productions under 50 gigabytes
  - o FTC's Accellion Secure File Transfer
  - o Non-FTC secure file transfer method may be accepted if coordinated with FTC Contact.

c. Submit a Production Transmittal Letter

For any format, accompany the submission with a letter that includes all of the following:
- volume name,
- Bates ranges and custodians,
- total number of records,
- total number of images or files,
- list of fields in the order in which they are listed in the data files,
- date and time format, and
- confirmation that the number of files on the volume match the load files.

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[1] The National Institute of Standards and Technology (NIST) issued the Federal Information Processing Standard (FIPS) Publications 140-1 and 140-2 that details certified cryptographic modules for use by the U.S. Federal government and other regulated industries that collect, store, transfer, share and disseminate sensitive but unclassified information. More information about FIPS 140-1 and 140-2 can be found at http://csrc.nist.gov/groups/STM/index.html

d. What About Hosted Productions?

The Bureau of Competition accepts hosted productions IF:

1. you demonstrate for Bureau staff the review tool, which must include (at a minimum), all of the following:
    - full Boolean or similar searching of both text and fielded data, separately and combined,
    - ability to add custom coding fields,
    - printing of documents with document ID number or Bates number on native files,
    - training and technical support,
    - local batch printing,
    - ability to download native documents, and
    - customizable user permissions.

2. we can establish access to the demo database to rule out network security issues (due to stringent network security policies at the FTC, we cannot guarantee we'll be able to access the system), and

3. the Bureau of Competition staff person identified in the formal request confirms in writing the production requirements.