2013 BCP Update Worksheet

Preliminary Risk Assessment

Does the firm provide access to the securities and funds of its customers through a clearing firm? Yes/No

Does the firm provide trade execution services on behalf of its customers? Yes/No

If yes, does the custodian allow for clients to contact the custodian directly in the event of a disruption? Yes/No

If custodian do not allow direct access, how will clients obtain access to their funds or securities in the event of a disruption?

If the services provided by the firm do not include providing its customers with access to their securities and or funds, describe the services that are critical for client contact during a disruption:

Does the	firm maintain	a checklist of	f action item	s to be don	e at such	time as the	firm in	nplements
its BCP?	Yes/No							

Technology

What is the name, address, phone number, and contact of the technology provider ("Technology Provider")? ______.

What services are provided by the Technology Provider?

Are those services critical to the day to day operations of the company? Yes/No

If yes, does the Technology Provider have a business continuity plan? Yes/No

If no, what are the contingency plans for a disruption of services by the Technology Provider?

Where are the Firm's primary computer servers located?

Are the primary computer servers backed-up in a different geographic location? Yes/No

If yes, where is the backup location: _____

Where are the Firm's e-mail servers located?

Are the e-mail servers backed-up in a different geographic location? Yes/No

If yes, where is the backup location:

Vendors

List all vendors utilized by the firm to provide services to its clients below, and categorize the critical nature of their services as high, medium or low:

Vendor Name

Critical

Low/Medium/High

Low/Medium/High

 Low/Medium/High
 Low/Medium/High
 Low/Medium/High
Low/Medium/High

To the extent that the services provided by the third party vendors have been categorized as medium or high critical to the services provided by the firm, have you received a BCP from each of those vendors? Yes/No

If no, what are the contingency plans for a disruption of services by any vendor critical to your operations that who does not have a BCP?

Facilities and Communications Systems

Phones

Who is the Firm's primary telephone provider?

Does the phone system utilize internet (voice over internet protocol)? Yes/No

Is there a secondary telephone provider? Yes/No

If yes, list providers: _____

Internet

Who is the Firm's primary internet provider?

Does the firm have a secondary internet provider? Y/N

If yes, is the secondary internet provider currently connected? (Y/N

Alternate location

Where is the alternative location for a local disruption?

Where is the location for a regional disruption?

With respect to the alternative locations, please review the following questions so as to make an assessment of the capability of the alternate location(s) to accommodate personnel from the disrupted location?

Personnel

- Key personnel only? Yes/No
 - If yes, list the key personnel?
 - If no, how many personnel will be at the temporary site?

Facilities

• Approximately how many square feet of space will be utilized at the temporary location: _____

- Does the firm maintain computers at the temporary site? Yes/No
 - If no, describe plan to move computers and or access servers:
- Does the firm maintain a phone system at the temporary site? Yes/No
 - Does the firm maintain spare phones for the temporary site? Yes/No
 - If no, describe plan to provide phone access to clients from the temporary site:
- Does the temporary site have internet access? Yes/No
 - Is the internet access wireless or hard wired?
 - If hard wired, does the firm adequate spare routers for the temporary site to assure all computers have internet access (and phones if VOIP sysem is utilized)? Yes/No
 - If no, describe plan to provide internet access from the temporary site:
- To the extent the temporary site is located in the same region, does the temporary site have access to a back-up generator? Yes/No
 - If no, describe plan to obtain power for facilities in the event of a regional disruption:

Remote Access

Does the BCP include provisions for certain employees to work from home? Yes/No

- If yes, do they have
 - o internet capability? Yes/No
 - the ability to access the firm's server? Yes/No
 - o redundant phone access? Yes/No
- If no, describe the activities such persons will perform and whether those services are critical to the firm: _____

Branch Offices

- Where is the alternate location?
 - Office space_____
 - o Computers_____
 - o Telephones_____
 - Internet capability_____

Testing

Does the BCP address annual testing of the BCP? Yes/No If yes, does the firm maintain records evidencing the annual test? Yes/No If no, describe how the firm evidences the integrity of its BCP:

Other Issues

List other considerations made in refining the firms BCP: