Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, NW
Washington, DC 20580
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January 11, 2000

Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: <u>Advisory Committee on Online Access and Security--Nomination, P004807</u>

Dear Sir:

Pursuant to the Notice and Request for Nominations printed in the Federal Register, Vol. 64, No. 244, on Tuesday, December 21, 1999, the Electronic Financial Services Council (the "EFSC") is submitting this nomination of James D. Trovato, Manager of the Virtual Security Team at Intuit Inc. ("Intuit"), to serve on the Federal Trade Commission Advisory Committee on Online Access and Security (the "Advisory Committee"). The EFSC is comprised of eighteen member companies, one of which is Intuit. The EFSC's mission is to enhance consumer access to financial products and services at lower cost by promoting legislation and regulation to ensure that electronic commerce continues to revolutionize the availability and delivery of financial services, including mortgage loans, insurance products, investment products, consumer loans and credit, and on-line banking. A list of EFSC members is attached.

As Manager of Intuit's Virtual Security Team, Mr. Trovato is responsible for managing the company's internal security procedures, defining the minimum level of internal protection required for maintaining adequate levels of security, and ensuring that security topics are being addressed in a complete and consistent manner throughout the company. Mr. Trovato coordinates the definition and enforcement of all company

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policies on internal information security. Clearly these responsibilities would equip Mr. Trovato with the knowledge that is applicable to the Advisory Committee's task of recommending options on how to define appropriate standards for granting consumers secure access to personal information collected from and about them.

The EFSC believes Mr. Trovato is well qualified to assist the Advisory Committee with the various technical aspects of security procedures concerning access to protected information.

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His expertise in defining and enforcing information security procedures will offer the Committee a unique understanding of the challenges of dealing with privacy and security issues in the online environment.

Mr. Trovato will represent the broad range of interests of the EFSC's member companies, all of which operate commercial Web sites and interact with consumers over the Internet. The EFSC is comprised of companies diverse in charter or lack thereof, size, and products and services offered. EFSC membership ranges from financial institutions such as Citigroup and Wells Fargo, to insurance companies such as AIG and The Principal Financial Group, to on-line lending platforms such as E-Loan and Lending Tree. Mr. Trovato's participation will also bring to the Advisory Committee the views of software developers such as Microsoft and his employer, Intuit.

As required, Mr. Trovato is available to participate in all four of the Advisory Committee's scheduled meetings. Mr. Trovato's resume is attached.

Please contact me at (202) 974-1010 if I can provide additional information regarding this nominee or if you have any questions. Thank you.

Sincerely,

Jeremiah S. Buckley
Electronic Financial Services Council

Attachments
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JAMES D. TROVATO, JR.
Professional Skills Summary

560 Elm Street #308   Home: (650) 591-9156
San Carlos, CA 94070-2256   Work: (650) 432-1810
eMail: trovato@visa.com

<u>Career Objective:</u>
Mr. Trovato's short term objective is to secure a senior management position that will allow him to manage technical solutions to business opportunities and issues. His longer term goal is to operate in an executive business capacity to ensure market leadership and increased profitability for the corporation.

<u>Background:</u>
Twenty one (21) years of increasing responsibility in numerous and varied data processing environments, with a demonstrated ability to consistently meet or exceed goals in a timely manner and within budgetary constraints. A proactive and innovative approach to identifying and satisfying short and long term objectives with a primary focus on overall quality and customer satisfaction have been the trademarks of his professional career.

<u>Proficiencies:</u>
- I am an energetic, motivated and goal-oriented individual who eagerly accepts new challenges.
- I am a good team player and consensus builder, both at the executive level as well as at the internal IS working level.
- I feel strongly about delivering solutions on time, on budget and in a quality manner.
- I have been involved, either as a programmer, analyst or manager, in building, deploying and operating a wide variety of data processing systems.
- I am personally a strong technologist with a special talent in systems analysis and software design.
- I excel at identifying, attracting and retaining high quality technical talent.
- I have strong verbal and written communication skills and enjoy delivering presentations to both technical as well as non-technical audiences.

<u>Education:</u>
Bachelor of Science (BS), 1977, Indiana University of Pennsylvania, major– Business Systems Analysis with courses in statistics, COBOL and FORTRAN programming, systems analysis and design.

5/92 - Present   Visa International Service Association

9/96 - Present   Vice President, SET Secure Electronic Transaction™

Currently functions as a key member of the Consumer Internet Commerce team within the Electronic Commerce Division, whose mission it is to lead the evolution of Visa dominance in the global electronic commerce marketplace. Responsibilities include:

- Manage the team responsible for the design and development of the SET specification and associated documentation.
- Manage the development and on-going operation of the SET Compliance and Interoperability Testing programs.
- Serve as the primary focal point of interface at Visa to the hardware and software organizations around the world who are developing SET solutions.
- Assist with the formation of SETCo, an entity owned jointly by Visa and MasterCard, make recommendations related to the overall organization structure and decision-making processes.
- Manage annual budget of $3 - 5 million.

6/93 - 8/96   Director, Testing and Certification Services

Reported directly to a Senior Vice President as the initial manager of a new group that was formed at the request of the Visa membership. The objective was to develop the infrastructure and associated operational processes in support of Member testing with core VisaNet systems. Knowledgeable individuals from other Development organizations within Visa were selected in order to build the team that was able to meet the aggressive timeframes that were required by the end users. Responsibilities included:

- Creation of overall plans and management of the technical staff responsible for the development and implementation of the tools and infrastructure needed to allow on-demand, unattended (by Visa staff) testing of host-based systems at Visa Member Banks. The batch-oriented Clearing and Settlement testing environment was developed as the first phase, and the Online Authorization testing environment and PC-based tools as the second and final phase of this three year project.
- Made presentations to Visa Senior Management and Member Advisory Committees in order to secure approval of design approaches and agreement on production service levels.

- Coordinated and executed training efforts for Visa Operations and Member Services staff who operate and use the VisaNet Certification Management Service (VCMS) testing facilities as a tool in support of the Member financial institutions.
- Provide customized support for strategic Visa initiatives and semi-annual software releases by translating business requirements into technical certification test suites and programs which were capable of automatically validating Member readiness for new or enhanced VisaNet services.

5/92 - 5/93   Director, Quality Assurance

His first position at Visa was to manage a staff of 7 Project Leaders and 23 programmer / analysts in support of the Quality Assurance (QA) function within the Service Assurance Division. Responsibilities included:

- Managed the QA process for all Clearing and Settlement System (CSS) deliverables within the guidelines of the system development methodology if effect at that time.
- Prioritized and organized workload, evaluated and resolved situations that could jeopardize timely completion of all required test scenarios, selected and implemented the most cost-effective testing solutions to ensure the best overall quality possible within time and resource constraints.
- Primary interface to the application development group for management of Test Request and Discrepancy Report queues.
- Made presentations at periodic Milestone Reviews to advise of actual test completion status, assess implementation risk, and make a "go" or "no go" recommendation to Senior Management.

10/89 - 4/92   Senior Consultant, Triadigm International

Functioned as a Project Leader for the Quality Assurance group in the VisaNet Automated Clearing House (ACH) Service area within Visa International., specific responsibilities included:

- Management the Quality Assurance team members.
- Created and executed Integration and Regression test plans.
- Participated in application design sessions and milestone reviews.
- Primary interface to the application development group for coordination of Test Requests and Discrepancy Reports.
- Responsible for ensuring successful completion of the software certification testing for prospective new ACH service participants.

After two years, was transferred to the ACH Development group. Ensured that all aspects of the development and testing of the National Settlement enhancement to ACH were completed successfully, and within time and budget constraints. Responsibilities included:

- Created a full-scale production parallel testing environment.
- Devised a plan that allowed for making a copy of the production environment on a development machine so that certain system functions could be executed in a test environment before they were required to be executed in the production environment.
- Wrote Business Requirements documents for resumption of the ACH Service in the event of an extended data center outage, and for the implementation of a generic data compression algorithm.

5/83 - 9/89   Innovative Directions, Incorporated

As President and co-founder of the company, was involved in all aspects of the start-up and operation of a software development business which grew to twenty consultants operating from offices in San Francisco and Los Angeles. Details for specific time periods follow.

1/89 - 9/89   Consulting Manager, ATAC Business Services

Responsible for training a newly-hired salesperson in the fundamental concepts of data processing, as well as in assisting in the preparation of the marketing plan for the distribution of the Telekurs (N.A.), Inc. securities pricing data service.

1/88 - 12/88   Project Manager, LCS Incorporated

Functioned as the Manager of the Maintenance and Short-term Development staff. In this capacity, managed a staff of up to 10 programmer analysts which supported over 60 clients of LCS, Inc., a financial software services provider. Coordination and scheduling of staff activities, quality assurance, and management reporting were the primary responsibilities.

5/86 - 12/87   President and CEO, Innovative Directions Incorporated

During this period, functioned full-time as the chief administrator of the company. Reorganized staff responsibilities and functions to better serve our clients. Wrote a personnel policies and procedures manual, developed and implemented corporate budgeting and financial forecasting capabilities, and monitored the performance of two Regional Managers.

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1/84 - 4/86   Project Manager, Recreation and Parks Department, City and County of San Francisco

Initially was responsible for conducting a Feasibility Study for the Recreation and Parks Department. Two years were then spent as the Project Manager, lead analyst and application system designer. The development of seven key application systems was completed in a Wang VS environment using COBOL and the ResponseR Database Management System. Project teams were composed of a mix of IDI consultants and programmers from the City's central staff. Also worked with the Finance Director to assist with the annual budget preparation, and made numerous presentations to the City-wide data processing steering committee in order to secure approvals for the proposed direction of the data processing activities of the Department.

5/83 - 12/83   Consultant, National Advanced Systems

Provided general consulting, database design, database administration and educational services to data processors and end-users of the Model 204 relational database management system. Was also responsible for all aspects of the development of an Equipment Allocation system in support of the sales staff, was well as various other business application systems.

9/80 - 4/83   Independent Consultant

In various capacities, averaged over 1,900 billable hours per year for this two and one half year period. Contracts typically called for the analysis, design, development, testing and implementation of custom application systems. Worked very closely with the end-users for whom the systems at American President Lines, LTD., National Advanced Systems and Itel Corporation were developed. Provided application design and development, as well as system-level consulting services specializing in the Model 204 relational database management system. Also responsible for educating client staff members and interfacing with the developers of the Model 204 DBMS software as needed.

7/79 - 8/80   Consultant, Lambda Technology, Inc.

Performed various engagements as programmer/analyst with a large consulting firm in San Francisco. This allowed for participation in all phases of the development of large-scale computer application systems for Levi Strauss & Co., and American President Lines, LTD.

11/78 - 6/79   Consultant, Computer Corporation of America

This position involved programming and sales support for the Computer Corporation of America in Washington, DC. Was trained in and provided customer support for all aspects of the Model 204 relational database management system technology. Conducted end-user training, assisted with preparations for benchmark testing of the DBMS software, and provided custom programming support for Federal Government agencies and other CCA clients.

8/77 - 10/78   Junior Programmer / Analyst, National Railroad Passenger
                      Corporation (AMTRAK)

Worked as a maintenance programmer supporting the MSA Payroll package for AMTRAK. Trained in IBM JCL and utilities. Documented user procedures and process flows to enhance productivity in the Payroll Department.

Speaking Engagements - past 12 months:

- Sunergy 28 "Securing the Data Network" - Live TV panel discussion hosted by Sun Microsystems. (Focus of discussion was SET™ , 9/97).
- Internet Society of Egypt (Financial Services on the 'Net, 3/98)
- Spring COMDEX '98 (The SET™ Standard, 4/98)
- IBM Payments User Group Meeting (SET™ - A SETCo Perspective, 5/98)

References available upon request.

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Cendant Mortgage
Chase Manhattan Mortgage
Citigroup Mortgage, Inc.
Countrywide Home Loans, Inc.
E-Loan
The First American Financial Corporation
Freddie Mac
GE Capital Mortgage
GHR Systems, Inc.
GMAC Mortgage Corporation
Intuit Inc.
Lender Services, Inc.
Lending Tree
Microsoft Corporation
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