

Appendix 2: Submitting Entity Start-up Checklist **Version 2.1 – June 1, 2014**

Submitting Entity: _____

FBI Assigned ORI: _____

Address: _____

Executive Contact: _____

Phone: _____ **E-mail** _____

Operational Contact: _____

Phone: _____ **E-mail** _____

Submitting Entities are the State Identification Bureaus (SIB); the Federal Submitting Agencies who are submitting applicant fingerprints for themselves and/or for other federal applicant agencies; and Authorized CHRI Contractors who submit fingerprints for applicant agencies under contract. Prior to providing Rap Back services for potential Subscribing Entities within their purview, Submitting Entities must work with FBI CJIS Division to ensure that they have created the appropriate infrastructure to support their role as a Submitter. This Checklist is to guide the FBI CJIS Division and prospective Submitter through the requirements.

One goal of the Checklist is to assist those Submitters who already have in-state or federal agency Rap Back Programs to decide the best means of adding the national service to their existing efforts. In addition it is hoped that State Identification Bureaus without any current Rap Back programs can use the Checklist to decide upon the best way to implement the NGI Rap Back functionality as a full service in-state and out-of-state Rap Back service. Equally, the Checklist is intended to assist Authorized CHRI Contractors in deciding the best means of implementing NGI's Rap Back in the context of their existing activities.

The FBI CJIS Division's role is to ensure that all NGI Rap Back Submitters fully understand the requirements of Rap Back and of their roles as Submitters. It is critical that the FBI CJIS Division holds each Submitter to the same set of participation standards so that all contributors know that the program controls are being universally applied and their data and applicants are protected under those controls.

As such, the FBI CJIS Division guides the potential Submitters through this Checklist, answers their questions regarding policy, compliance, etc., and acts as the arbiter of when the Submitter is ready to begin submitting NGI Rap Back subscriptions. The Submitters' written responses to this Checklist comprise their Rap Back Plan, which will identify system implementation choices and document the Submitter's readiness.

Following are the steps FBI CJIS Division must follow with each Submitter:

1. Regarding the authority for the Submitter to participate in Rap Back.

NGI's Non-Criminal Justice Rap Back Service requires that the participating state and federal agencies and all participating entities have authority:

1. To submit the fingerprints to NGI;
2. For the fingerprints to be retained by NGI; and,
3. For the fingerprints to be searched by future submissions to the NGI system and appropriate responses sent to submitting entities. These future searches include latent fingerprint searches.

_____The Submitter has verified their authority to participate in NGI's Rap Back Service.

_____The Submitter agrees to verify the authority of each Subscribing Entity prior to allowing their participation in NGI's Rap Back Service.

2. Verify that Submitter agrees to train Subscribers prior to the Subscribers' participation and to administer NGI Rap Back policies and requirements with their Subscribers.

As the FBI CJIS Division must ensure the compliance of all Submitting Entities, so also must the Submitters ensure the compliance of all the Subscribing Entities for whom they submit applicant prints and Rap Back Subscriptions. The first step in ensuring the compliance of the Subscribers is that the Submitting Entity agrees to work through and understand the Non-Criminal Justice Rap Back Policy and Implementation Guide. The Submitter must also agree to train their Subscribers on at least the information in the Subscribing Entity Reference Guide (Appendix 3) prior allowing them to submit Rap Back subscriptions to NGI. Also, the Submitter must agree that they will continue to administer Rap Back policies and requirements for their Subscribers.

_____Submitter agrees to train the Subscribers on at least the Subscribing Entity Reference Guide and to administer NGI Rap Back policies and requirements with their Subscribers

3. Verify that Submitter agrees to train and audit all Subscribers under the CJIS Security Policy requirements.

Statement of audit requirements will go here when completed.

_____Submitter agrees to train and audit all Subscribers under the CJIS Security Policy requirements

4. Identify the Subscription Management Plan the Submitter has chosen.

Each Submitter must decide upon and implement the appropriate Subscription Management Plan for its Subscribers.

The design of the NGI Rap Back service provides Submitting Entities a choice between two alternatives for how to manage the subscriptions they submit. These choices are intended to allow Submitters with current Rap Back programs to more easily integrate the national system into their current efforts, and allow Submitters starting new programs to decide the easiest means for them to take advantage of the national service.

It is anticipated that Submitters will select a single Plan for all Subscribers in their jurisdictions; however, Submitters may use both Plans in combination, if it would be beneficial. The Submitter is responsible for ensuring that all subscriptions passed to NGI are managed under the chosen Subscription Management Plan. The two Plans are as follows:

A. EVENT-BASED SUBSCRIPTION MANAGEMENT

The Submitter establishes a new NGI Rap Back subscription for each subscription request from a Subscribing Entity.

That is, separate NGI subscriptions are set on the same NGI Identity for each subscription event for that person—each application for a license, application for a covered governmental job, application to volunteer, etc. The subscription is based upon each event.

The Submitter will manage each subscription separately, including multiple subscriptions on the same Identity. A future criminal event against that Identity would generate separate Rap Back Activity Notifications from the separate subscriptions. See the Rap Back Policy and Implementation Guide for further discussion.

Under Event-Based Subscription Management, the Subscriber may identify Designated Recipients (up to 9) to receive notification of Rap Back activity on a specific subscription.

If Designated Recipients are used, does the Submitter understand and communicate to the Subscribers:

- _____ The Designated Recipients must have FBI assigned ORIs and be authorized to receive the CHRI related to this subscription;
- _____ Their authority must be directly related to the reason for the subscription itself;
- _____ They must be authorized to receive it under the same conditions as the Subscriber;
- _____ That this function cannot be used to add additional recipients related to other civil events (applications, volunteering, licenses, etc.) for this person's NGI Identity, only to add additional recipients authorized to receive notifications related to this one subscription;
- _____ That the participation of the Designated Recipients is totally dependent upon the Subscribing Entity maintaining their ORIs in the Electronic Biometric Transmission Specification (EBTS) Designated Recipient field.

If the Event-Based Subscription Management Plan is chosen and Designated Recipients are used, do the Submitter’s processes and procedures include the ability to:

- _____ Include Designated Recipients for setting a Rap Back subscription with initial fingerprint submission or Subsequent Subscription;
- _____ Automatically or through manual means process the messages to the Designated Recipients from the SCO field of the Rap Back Activity Notification.

B. CATEGORY-BASED SUBSCRIPTION MANAGEMENT

The Submitter establishes a single subscription for a Category within an NGI Identity and tracks all subscriptions internally, without any subscriber information residing in NGI.

That is, the Submitting Entity creates just one subscription per NGI Identity for each identified Category as called out in the Rap Back Policy and Implementation Guide, and does not add any Subscriber information to the NGI record. These subscriptions can be thought of as “Submitter-Owned” subscriptions. The Submitter manages all NGI subscription adds, deletes, modifications, notifications, etc. internally. The subscription is based upon the Submitter knowing and managing the subscription information locally.

This approach may be beneficial for Submitters with in-state or federal agency Rap Back programs who want to send NGI notifications through their current processes. They keep their NGI “Submitter-owned” subscriptions synched with their in-state or federal agency Identity records that have one or more subscriptions. Then the Submitter processes any NGI notifications relevant to that Identity to the single or multiple in-state or federal agency subscribers, as appropriate. The burden is on the Submitter to ensure that the appropriate Privacy Strategy and other Rap Back controls are enforced in their subsequent processing of notices received from NGI.

This Subscription Management Plan requires the Submitter to track all subscriptions within their own records. Appendix 5: NGI Rap Back Subscription Management Plans contains further discussions.

If the Submitter chooses Category-Based subscription management, have they identified adequate controls to:

- _____ Track all in-state or federal agency subscriptions related to NGI Identities;
- _____ Ensure that the appropriate Privacy Strategies and other Rap Back controls are applied to the Rap Back Activity Notifications generated by NGI on the Submitter-owned subscriptions. This is always important and may be a larger challenge when different Subscribers on the same Identity require different processing (e.g. one gets pre-notification; one gets the Triggering Event and Identity History Summary; one gets just the Triggering Event);
- _____ Similarly, ensure that the appropriate Triggering Events are stored in their Submitter’s files, accommodated in the NGI Rap Back Submitter-owned subscription record, and processed accurately to the Subscribers;
- _____ Ensure that the Submitter’s own files accurately track the various Expiration Dates of the Subscriptions, that the Submitter-owned NGI subscription contains an appropriate subscription Expiration Date, and that the NGI subscription is removed immediately after the last subscription expires;

- _____ Audit their processes. Since the Submitting Entity has taken on responsibility for the administration of all the subscriptions, they must have controls in place to enforce all the NGI Rap Back Policies at the Submitter level, with adequate documentation in the files to show the processes related to the subscriptions and the controls in place to ensure compliance to policy in addition to the standard non-criminal justice auditing and training requirements;
- _____ Administer the fees. Since only one NGI subscription will be established even though there could be multiple in-state or federal agency subscriptions in a Category, the Submitter will have to manage how they handle the various fees.
- _____ Reconcile Submitter-level billing without itemized assistance from FBI CJIS. Since Category Based subscriptions are all entered with the Submitter's ORI in the ORI and CRI fields, the subscription bills from CJIS for Category Based Submitters will show just one total for the Submitter, all itemized to the Submitter. The Submitter will have to have audit processes in place to be able to reconcile the Rap Back Subscription fees to be charged to each Subscriber, without additional information from CJIS.

5. Identify how the Submitter and Subscribers have chosen or will choose the Privacy Strategies for the different populations of the Subscribers.

The FBI CJIS Division will provide to each Submitter the Rap Back Policy and Implementation Guide and Appendices, which includes the Approved Privacy Strategies for NGI Rap Back in Appendix 1.

- _____ If the Submitter already has a Rap Back program, determine how the NGI privacy risk mitigation requirements fit in with their current activities.
- _____ The discussion should include the specific privacy risk mitigation tools the Submitter will use with Subscribers.
- _____ Ensure that Submitter understands these operational concepts and can work with their Subscribers to identify the correct Rap Back Privacy Risk Mitigation Strategy by evaluating the implementation of these operational processes by the Subscriber. Key operational components of the Privacy Strategies are:
 - Rap Back Activity Notification Formats;
 - Subscription Term;
 - Subscription Expiration;
 - Monthly Validation/Expiration List processing.
- _____ The Submitter must agree to work through the relevant decision points regarding the Privacy Risk Mitigation Strategies with the Subscribers, using at least the information in the Subscribing Entity Reference Guide.
- _____ The Submitter understands to role of the Privacy Risk Mitigation Strategies that will be used with their Subscribers, and how they will work with Subscribers to choose and administer those Strategies.

6. Verify that the Submitter understands the relationship of Expiration Date to Rap Back Term Date.

Choosing the Privacy Strategy, as discussed in Item #5, above, determines the Expiration Date for the Subscription. It is critical that the Submitter understand the relationship between that Expiration Date and the Rap Back Term Date of the Subscription. The management of these dates is key to the correct functioning of the Rap Back Service, as follows:

- The Rap Back Term Date reflects how long of a subscription period has been purchased by the Subscriber through the payment of the fee.
- The Expiration Date is the date at which the subscription expires to fulfill the validation requirement, even if time still remains on the Subscription Term. If time does remain on the Subscription Term, the subscription may be “extended” with no additional fee.

The Subscriber must pay a fee for each NGI Subscription. The amount of the fee determines the length of time (the Subscription Term) during which the subscription can be repeatedly “extended” without incurring an additional fee. The available Subscription Terms are 2-year; 5-year; or, lifetime

Although the Subscriber pays a fee for a 5-year Subscription Term, for example, that does not mean that the subscription automatically remains active for five years. The Privacy Risk Mitigation Strategies require that NGI Rap Back subscriptions be reviewed and validated at certain Expiration Dates in order to remain in NGI.

The logic is as follows:

- a. The Subscriber has paid for the Subscription to remain in NGI for a certain Subscription Term (2-year; 5-year; or lifetime), so they will not be charged again during that Term.
- b. However, the approved Rap Back Privacy Risk Mitigation Strategies require that the Subscriber periodically verify that they are still in an authorizing relationship with the subscribed person—the subscription must be validated at intervals determined by the Privacy Risk Mitigation Strategy chosen by the Subscriber and Submitter.
- c. At the mandatory Expiration Date required by the chosen Privacy Risk Mitigation Strategy, the Subscriber must review their subscription, validate that it can still be in NGI Rap Back and, if it is still valid, “extend” it for a new validation/expiration period that is within the Subscription Term. If they do not extend the subscription, it is automatically removed from file at the Expiration Date.
- d. The Subscription is “extended” by use of the Rap Back Maintenance “Replace” transaction, through which the Subscriber replaces the Expiration Date field with a new date that is consistent with the selected Privacy Strategy, and which does not extend the subscription past the Rap Back Term Date.
- e. No fee is charged for the Rap Back Maintenance “Replace” transaction that replaces the Expiration Date field with a new “extended” Expiration Date that is less than or equal to the Subscription Term.
- f. If the new Expiration Date would extend the Subscription past the Rap Back Term Date, the Subscriber must either:
 - i. Use a different Expiration Date that is less than the Rap Back Term Date;
 - Or
 - ii. “Renew” the Subscription for a new Subscription Term. The renewal is accomplished by using the Rap Back Maintenance “Renew” transaction to renew

the Subscription; automatically create a new Rap Back Term Date; enter a new Expiration Date; and incur a new subscription fee.

- g. The Rap Back Maintenance “Renew” transaction which renews the Subscription does cause the billing process to charge the Subscriber a new Rap Back subscription fee.

_____ The Submitter understands the use of the Subscription Term and the Expiration Date and can assist the Subscribers in choosing appropriate Subscription Terms for their Subscriptions.

7. Verify that the Submitter has a plan for processing Monthly Validation/Expiration Lists or is implementing an alternative Validation Processing Plan.

The validation of the Rap Back subscriptions can be accomplished using the monthly validation/expiration lists, or the Submitter may opt-out of receiving those lists if they have implemented an alternative validation process that reliably results in the validation of all subscriptions prior to reaching their Expiration Dates.

If the Submitter is using the monthly validation/expiration lists, they must prepare processes to handle the receipt of the lists from CJIS each month and their subsequent processing and response from the Subscribers.

The flow is as follows:

1. CJIS provides the Submitters a list of all the subscriptions that will expire in the month that occurs approximately 45-75 days in the future (on November 15th they send the January expiring records).
2. The list is sorted by Subscriber ORI. The Submitter separates the list and sends each Subscriber their portion through secure electronic means (or whatever is the agreed upon secure communications methodology).
3. The Subscriber must review all the subscriptions and verify whether they still have the authorizing relationship with each person and can therefore “extend” or “renew” the subscriptions. Then:
 - a) They create a bulk response to the validation/expiration list, indicating which subscriptions should be extended, which ones should be renewed, and which ones are no longer valid or will expire at the date indicated on the list.
 - b) For those that can be extended, they must include the new Expiration Date.
 - c) If the new Expiration Date would extend the subscription past the Rap Back Term Date, the Subscriber must renew the Subscription and pay the fee that results from that transaction.
 - d) If the subscription is no longer valid at present, the Subscriber should include in their response to the validation/expiration list that it should be canceled immediately.
4. For all the responses on the list from the Subscriber, the Submitter sends the updates to NGI.
5. Ten days prior to the expiration of each of the January subscriptions that were not extended or renewed by the Subscriber and Submitter through the monthly validation/expiration list process, NGI will send an EBTS Rap Back Renewal Notification as an additional reminder. (The Submitter can opt-out of receiving those reminders.) For each one, if no response is received by NGI by the date of expiration, the NGI System deletes the subscription. The civil event associated with the subscription remains in file.

6. After the end of January, NGI sends the Submitter a list of all the January Subscriptions that expired or were canceled. As previously agreed upon by the Submitters and Subscribers, the Submitter sends those lists of expired and canceled records to the Subscribers for them to check for any errors. (The Submitter can opt-out of receiving those expired/canceled records lists.)

_____ Submitter has chosen to receive the monthly validation/expiration lists, understands the processing, and has a plan for fulfilling their role.

_____ As the monthly validation/expiration and expired/canceled lists are not sent via an EBTS transactions, Submitter is providing the following secure location for the CJIS transmittals: _____

The Monthly Validation/Expiration List process is only one means of fulfilling the validation/expiration requirement of the Privacy Risk Mitigation Strategies.

It is also possible for Submitters to opt out of receiving the monthly validation/expiration lists if they have created an alternative process that adequately addresses validation/expiration. That process would have to result in the Rap Back Maintenance “Extend” or “Renew” transactions being sent to NGI prior to the subscriptions’ Expiration Dates. It is requested that Submitters discuss with CJIS any plans to create such a process, so that CJIS and the Submitter can ensure that all details have been considered and addressed.

_____ Submitter understands the possibility of creating an alternative validation process, and they will discuss such a plan with CJIS prior to implementing it.

_____ Submitter understands the opportunity to opt-out of some of the services put in place to assist the Submitter with fulfilling the validation requirement, and is choosing to opt-out of the following NGI Rap Back services:

- _____ The monthly validation/expiration list process;
- _____ The Rap Back Renewal Notification (RBRN) EBTS messages for those subscriptions that will expire in ten days; and,
- _____ The list of subscriptions expired or cancelled in the previous month.

8. Verify that the Submitter has created a communication methodology for their Subscribers.

As discussed in the Rap Back Policy and Implementation Guide, the Subscribers need to have a clear understanding both of the functions that Rap Back offers them and of how they as Subscribers communicate those activities to NGI through the Submitter. The Submitter must create a communications methodology for the Subscriber to keep the Submitter notified of all subscription adds, deletes, and modifies. The Submitter must include a description of the communications methodology in their Submitter’s Rap Back Plan with at least the following elements.

- _____ A plain language description of the communications methodology (secure email, secure website communications, via overnight mail, by phone, etc.). Include whether options for different methodologies exist for the different Subscribers. This communications methodology could also be through a vendor operating under a contract with appropriate outsourcing controls in place.
- _____ Whether the Submitter has created any defined forms or messages that the Subscriber's internal processing must use to communicate the different transactions to the Submitter, to include communications with third party vendors. If the Submitter is requiring the Subscriber to supply an electronic message that is in the EBTS format, such as through a vendor, for example, the Submitter must provide clear guidance on the field definitions, formats, mandatory status, etc.
- _____ The procedures for handling EBTS errors received from NGI that need to be communicated to the Subscribers; including policies or procedures that ensure the Subscribers know what follow-on action is necessary, such as correction and re-submission of Rap Back Subscription information, etc.
- _____ Discussion and documentation of all the possible transactions that the Subscriber and Submitter must handle, and whether all of them are accommodated within the Submitter's communications methodology with the Subscriber, and whether the Submitter has the ability to pass all of them on to NGI in the correct EBTS formats.
- _____ Discussion and documentation of controls within the communications methodology to ensure that the messages are sent, received, and processed in the expected timeframe to and from the Subscriber and the Submitter.
- _____ Discussion and documentation of controls regarding the validation/expiration and renewal processing, focusing on the need for formalized procedures with Subscribers to handle the monthly validation/expiration lists and the monthly expired and cancelled records lists.

9. Verify that the Submitter has created the capability to capture all Rap Back data elements and to send and receive all required Rap Back transactions to and from NGI in the EBTS formats.

NGI's Rap Back Service is a completely automated service between NGI and the Submitters. Submitters may have manual processes between themselves and their Subscribers, but all transactions coming to NGI must be sent electronically (or in some cases on magnetic media) using the EBTS requirements. As such, prior to participation, the Submitter must verify to the CJIS Division that they have the capability to accommodate all the EBTS Rap Back data fields and to send and receive all the EBTS Rap Back transactions.

EBTS version 10.0 has the Rap Back related data elements and transactions required for Rap Back participation. Appendix 4: Non-Criminal Justice Rap Back Related Data in EBTS summarizes the data elements and transactions. The latest available version of the EBTS can be found at website: <https://www.fbi Biospecs.org/ebts.html>. The Non-Criminal Justice Policy and Implementation Guide describes the transactions in the Section titled NGI Rap Back Service Transactions.

- _____ The Submitter's Rap Back Plan verifies that they have the capability to capture all the above data elements.
- _____ The Submitter's Rap Back Plan verifies that they have the capability to send and receive all the Rap Back transactions contained in the EBTS.

10. Verify that the Submitter has assigned appropriate Category codes to all statutes or other authorities under which they will submit Rap Back Subscriptions to NGI.

The EBTS Rap Back Category field requires a value for each subscription request, and that value must derive from the authority under which the request is submitted. The Submitter must ensure that all subscriptions are requested under the correct Category code.

- _____ Submitter’s Rap Back Plan verifies that they have assigned Category codes to all statutes and other authorities under which they will submit subscription request.
- _____ The Submitter must have a process they will use to ensure the Category code is correctly included with each transaction. It can be supplied by the Subscribers with their subscription requests to the Submitters, or the Submitter may establish a process to assign each Category value to the transaction as the requests are received from the Subscribers.
- _____ The Submitter must have a process to ensure that new values are assigned for subscriptions that are requested under new statutes or other authorities, as those authorities become available to Subscribers.

11. Verify that the Submitter understands Rap Back Triggers and will assist Subscribers with choosing triggers to be used in their subscriptions.

The Submitters must understand:

- _____ That future events reported to NGI will cause Rap Back Activity Notifications to be sent from NGI to the Subscriber only if that type of event is on the subscription’s list of Triggering Events;
- _____ That the “Criminal Retain Submission” trigger will be set by NGI by default for every subscription, even if no Trigger Event field is included in the subscription request transaction;
- _____ That Subscribers must identify any additional Triggering Events from the list in the Non-Criminal Justice Policy and Implementation Guide that they would like included in their subscriptions;
- _____ That the Submitters can require the Subscribers to send their additional triggers with each subscription request, or the Submitter can agree to automatically set the additional triggers for each Subscriber.

- _____ The Submitter understands the use of the Triggering Events and that additional Triggering Events can be set with each transaction.

12. Verify that the Submitter has created a strategy for the User Defined fields

These fields are provided to allow the Submitters and Subscribers the greatest flexibility in managing the Subscriptions. Whatever is included in these fields will be returned to the Submitter within Rap Back Activity Notifications and other Rap Back transactions to provide detailed linking ability for the Submitters and Subscribers.

_____As such, each Submitter must decide whether to create a plan at the Submitter level for linking subscriptions back to the right Subscribing Entity.

_____If the Submitter does not need a standardized use of any of the fields for their level of routing, it is acceptable for a Submitter to delegate use of the User Defined fields to each Subscriber to assist in linking the incoming messages to the right section within their organization, and to the right person. The emphasis is on identifying information that will have meaning when the Rap Back Activity Notification is received years after the subscription was originated. On many occasions the persons receiving it will be different than those who originated the subscription. It is recommended the Submitting Entity stress the need for standardized use within each Subscriber.

13. Determine whether the Submitter has the capability to set and apply default settings for Subscribers.

The Subscriber can choose to set some values by default for the Subscribers, if the Subscribers want that service. For example, the Submitter could agree to set the value for the Triggering Events; the Subscription Term; the Category Code; the Rap Back Activity Format, and others for all of a Subscriber's subscriptions. This could possibly simplify communications between Subscriber and Submitter. This capability is optional for the Submitters, and is not necessary if under the Submitter's communications methodology they require that each subscription message includes all the Rap Back Subscription fields' values from each Subscriber for each subscription. That solution would have to be clearly communicated to the Subscribers during the start-up discussions with the Subscribers.

_____The Submitter's Rap Back Plan describes the use of default settings for Subscribers.

14. Determine whether the Submitter has created a plan to ensure that all applicants are notified that his or her fingerprints will be retained in the national file and a summary of intended uses.

The Submitting Entity must ensure that this notice is provided to the applicants. This can be accomplished through a state-wide fingerprinting program, through the application process of each Subscriber or other verifiable means. The Submitter must ensure that each population for which they will submit subscriptions has a verifiable process in place. FBI CJIS will provide appropriate language for this notice.

_____The Submitter's Rap Back Plan describes the procedures that will be used to ensure that applicants receive the appropriate notice regarding future use of their fingerprints.

15. Determine whether the Submitter has decided to opt-out of in-state notifications

Those states with in-state Rap Back programs already in place may find that NGI's Rap Back service integrates best into the state efforts if NGI does not send the state Rap Back Activity Notifications on in-state events. The state system will continue to perform the in-state notifications and NGI Activity Notifications on those events would be duplicative to the Subscribers and may cause confusion.

This option is set on each individual subscription, which gives the state the option of setting default values for all their subscribers or of electing to opt-out of in-state notifications for some populations and not for others. The purpose of this Checklist item is to ensure that the SIBs have considered the best course of action for all their subscribing populations and have put the correct processes in place to fulfill those choices.

_____The Submitter’s Rap Back Plan describes the anticipated use of the Opt-Out of In-State Notifications function and what processes will be used to set the values in each subscription.

16. Verify that the Submitter has determined the appropriate fees and has communicated them to the Subscribers.

Submitters must have identified any changes to their fees and have communicated clearly to the Subscribers that NGI Rap Back Service will require a fee, and that fee is based upon the chosen Subscription Term. The Submitter must integrate the Rap Back Fee collection into its current services. Available Subscription Terms are:

- 2-year Term -- \$ 2.25
- 5-year Term -- \$ 6.00
- Lifetime Term -- \$13.00

If Category Based Subscription Management is used, the Submitter must understand the complexities related to the fees when using that approach. Those fee considerations are discussed in Appendix 5: NGI Rap Back Subscription Management Plans.

_____The Submitter understands the Rap Back Fees, will communicate them to the Subscribers, and collect them as appropriate.