

Achieving Compliance

**Meeting Today's Reporting Requirements
With Business Intelligence Technology**

An Expert Series White Paper

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Executive Summary

The demand for timely, reliable information is placing a tremendous amount of attention on corporate reporting and auditing practices. Financial institutions must comply with an ever-increasing number of regulatory mandates that impact both customer and capital information – such as the USA Patriot Act requirement to gather as much customer information as possible at all levels of interaction and the Basel II directive to track capital adequacy across the enterprise. Additionally, new legislation such as the Sarbanes-Oxley Act has brought financial reporting and forecasting to the forefront of today's executive agendas. At the same time, industry-specific regulations make unique demands for reporting and compliance in just about every public and private sector, from education to banking to pharmaceuticals.

This paper examines many types of reporting requirements faced by today's organizations, with attention to formal government legislation, industry-specific regulations, and internal governance. The overriding purpose is to explain the challenges, highlight potential solutions, and demonstrate how an enterprise business intelligence (BI) environment can help companies overcome hurdles related to gathering, analyzing, presenting, and storing information. This paper does not attempt to cover every industry regulation or offer details about all types of compliance, but rather to use a few examples to reveal how business intelligence technology can be applied universally in many different situations, where reporting and compliance are pertinent.

Formal Government Legislation

Complying With the Sarbanes-Oxley Act

Some types of compliance impact all companies in all industries, such as the Sarbanes-Oxley Act. Created in response to high-profile accounting and management scandals, such as the corporate abuses uncovered at Enron and Tyco, the Sarbanes-Oxley Act is crucial to restoring investor trust in public markets and reestablishing corporate and accounting credibility. The reforms are designed to reduce fraud and oversights in corporate reporting, accounting, and auditing practices.

The Challenge

Financial reporting and forecasting are placed in the spotlight by the Sarbanes-Oxley Act. Facing tightened quarterly and annual reporting deadlines, corporations must gather disparate information from throughout the enterprise, then quickly process, format, and distribute it.

Corporate executives are held personally responsible for the accuracy and consistency of information located anywhere in their organizations. Given just 48 hours to report material changes in financial status that could affect the stock market, these senior officers need to be able to quickly summarize financial information and drill down to the underlying details. They must establish and certify internal financial controls and be able to open up their audit trails to government auditors. Criminal penalties have been established for altering documents, which means companies must implement auditable document retention procedures and schedules.

The filing deadlines for 10Ks have been shortened to 60 days, and the filing deadline for 10Qs to just 35 days, forcing corporations to produce complex financial statements faster than ever before. Disclosure of additional off-balance sheet transactions (such as debt leases, lines of credit, and guarantees) must also be included in a company's regulatory filings, providing a more complete picture of financial health and making potential financial problems more visible.

A recent study conducted by Deloitte Consulting and *Business Week* shows that 93 percent of CFOs believe their jobs become more difficult under Sarbanes-Oxley and its heightened reporting requirements. Additionally, 63 percent of CFOs indicated that they are the ones who shoulder the burden for ensuring compliance with the new corporate governance regulations, serving as both stewards and strategists.

Meta Group suggests that organizations focus on the following financial reporting criteria¹:

- Aggregating financial data
- Making financial details more accessible
- Enabling frequent flash reporting
- Drilling down on accounting reports
- Highlighting key analysis areas based on tolerances and financial metrics
- Segmenting reporting into material/significant elements
- Enabling workflow
- Instilling a financial management mindset within the organization

The Solution

Most organizations deliver financial closing statements using a detailed consolidation cycle. Data from throughout the enterprise must be manually manipulated to create flash sheets and financial statements. Financial reporting is very complex. Rather than the usual columnar reports, it is cell oriented. Many analysts use spreadsheet programs such as Microsoft Excel to compute results and calculate totals because they help automate this process. However, to meet today's more stringent reporting requirements, these disparate financial reporting activities need to be combined into automated, repeatable processes. This involves simplifying data integration, report generation, and information delivery. For example, rather than allowing ad hoc report generation from Excel, departmental reporting processes should be integrated so that all sources of financial data across all lines of business can be quickly combined, summarized, and displayed.

Historically, financial reporting software was mainly geared to analysts and power users trained to use multidimensional databases, online analytical processing (OLAP) tools, and other specialized software. The latest business intelligence tools need to simplify the process considerably with user-friendly financial reporting capabilities that automate the collection, calculation, analysis, and presentation of financial information. Forecasting capabilities enable analysts and other financial professionals to quickly calculate moving averages, linear regression, and exponential moving averages on measures that they select from drop-down lists.

¹ Sarbanes-Oxley: The Impact on Financial Reporting, March 13, 2002.

There's no need to retrieve, group, and calculate data by columns, or to sort it numerically or alphabetically. Reports need to be easily sorted in order of liquidity or according to mandated rules. Excel PivotTables can be automatically generated and saved from any report, combining advanced reporting with Excel's powerful data manipulation capabilities.

The best BI tools can maintain drill-downs and styling when a report is saved to an Excel or PDF file, and perform columnar or inter-row calculations. These advanced financial reporting capabilities allow analysts and other business users to spend more time planning and forecasting, and less time validating, justifying, and auditing. As a result, companies can close each quarter faster, more accurately, and with greater understanding – and corrective action can be taken quickly, if necessary.

The USA Patriot Act

The USA Patriot Act, passed in October of 2001, is a vital tool in the continuing effort to prevent future acts of terrorism. The primary goals of the Act, which is also known as the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act, are to gather and cultivate detailed terrorism-related intelligence so potential terrorist plots can be detected, disrupted, and prevented, and to build our country's long-term counter-terrorism capacity. Although most of the act is targeted toward law enforcement agencies, it also poses a significant impact to financial organizations, higher education institutions, transportation and logistics companies, as well as any foreign organization doing business within the United States.

Integrated Justice and Law Enforcement

The act significantly increased the surveillance and investigative powers of law enforcement agencies in the United States. Above all, the act stresses the importance of having immediate access to timely, accurate, and complete information that can be quickly exchanged among law enforcement and justice officials.

Rapid reporting and information sharing is essential not only to respond to threats of international terrorism, but also for domestic terrorism, natural disasters, and many routine

incidences related to public safety. Common examples of interagency reporting include the ability to perform the following functions:

- Automatically query local, regional, statewide, and national databases to assess the criminal justice status of a person
- Report key transactions and events regarding people and cases to local, regional, statewide, and national systems
- Generate records that can automatically be “pushed” from one agency or jurisdiction to another based on actions taken within the originating agency
- Receive notification of actions or otherwise automatically “pull” information from other agencies or jurisdictions based on actions they have taken regarding individuals or cases of interest²
- Broadcast alerts among healthcare providers in response to threats of bioterrorism
- Enable port security solutions for identifying shipments, tracking goods, sharing information, and tracking patterns of activity

For example, the State of Pennsylvania developed and implemented a Uniform Crime Reporting (UCR) system that provides instant access to state crime data. The solution provides for the collection and reporting of information from any location with Internet access, including police departments, municipal buildings, schools, libraries, and private homes. Thanks to this Web-based business intelligence system, everyone from law enforcement agencies to private citizens can access crime information on demand.

Pennsylvania’s Uniform Crime Reporting Web site helps local police fight crime more effectively while giving citizens 24x7 access to crime statistics for towns, counties, regions, college campuses, and the state as a whole. It features real-time statistical analysis, queries that anyone can customize, and automated file transfer to the FBI national crime database.

² Roberts, David J., “Integrated Justice Information Systems Planning and Implementation: Organizing for Change,” SEARCH, the National Consortium for Justice Information and Statistics, August 2002.

Money Service Businesses – The Bank Secrecy Act

Title III of the USA Patriot Act requires all registered financial brokers and dealers – also called money service businesses (MSBs) – to implement anti-money laundering programs designed to achieve compliance with the Bank Secrecy Act (BSA). Money laundering involves acts committed to conceal or disguise the criminal origin of funds so that the unlawful proceeds appear to have derived from legitimate sources. All financial institutions, including credit unions, are subject to recordkeeping and reporting requirements of the Bank Secrecy Act and the Treasury Department’s regulations.

These organizations need BI tools to file Suspicious Activity Reports that help law enforcement officials identify fraudulent, criminal, or terrorist activity. According to Richard A. Small, assistant director with the Division of Banking Supervision and Regulation at the Federal Reserve Board, compliance with the Bank Secrecy Act and suspicious activity reporting requirements by financial institutions provides timely and valuable information to law enforcement and is the best indicator of the existence of satisfactory anti-money laundering and anti-fraud policies and procedures.³

The U.S. Postal Service took a proactive approach by establishing its own BSA Compliance Program. The Postal Service sells money orders and stored-value cards and offers a funds-transfer service, all of which make it a money service business. Over 100,000 employees at more than 35,000 locations sell approximately 1 million money orders each day.

The challenge faced by the Postal Service was to set up a compliance program that would provide training, monitor compliance, and – most importantly – automate BSA reporting processes. Using BI tools, the Postal Service built a secure BSA compliance system that applies a complex set of business rules as it searches through millions of money order transactions. Unusual transactions are identified and their associated images are captured by clearing banks – in this case the Federal Reserve Bank – and transmitted to the Postal Service for further analysis.

The system detects patterns that may indicate money-laundering activity and uses sophisticated drill-down, querying, and reporting functions to deliver to law enforcement officials the

³ “Reporting requirements under the Bank Secrecy Act,” (Delivered to the Committee on Banking and Financial Services, U.S. House of Representatives), April 20, 1999.

intelligence they need to identify criminals. This allows postal officials not only to identify suspicious transactions, but also to reconstruct purchase patterns for further analysis and to support law enforcement investigations through online query and reporting capabilities. Postal employees can enter information about transfers or purchases flagged by the system into a database that can be analyzed by law enforcement personnel. Data can be screened using 500 different parameters, such as money type or post office.

Industry Regulations

Formal government regulations stemming from legislation like the USA Patriot Act and the Sarbanes-Oxley Act have a universal impact on many companies in many market sectors. On top of that, specific industry regulations demand unique reporting solutions. For example, pharmaceutical companies must report on the results of clinical trials. Consumer goods companies must publish the results of safety testing. Educational institutions must track international students and scholars for the Immigration and Nationalization Service (INS). Financial institutions must respond to the specific risk-management mandates of BASEL II.

This section explains the ramifications of these far-reaching industry regulations, and explains how an enterprise-scale business intelligence environment can help ease the reporting burden.

Financial Services – BASEL II

Financial institutions are in the business of taking risk for their customers and are therefore subject to a high level of industry supervision and control. As part of Basel II – a directive designed to harmonize international banking regulations – government auditors demand proof of robust compliance controls and enhanced levels of management oversight, forcing senior managers to coordinate and monitor regulatory compliance activities.

This intensive regulatory environment demands an enterprise view of risk that enforces common reporting structures across the enterprise and the development of information sharing across functional departments. TowerGroup, a research and consulting firm focused on the global financial services industry, estimates that financial institutions worldwide will be spending some \$7.5 billion by the end of 2003 to approximately \$11.8 billion in 2005 in implementing Basel II. These figures include people, process, technology, and data initiatives.

Key technologies to support an enterprise risk-management framework include reporting, data collation, data cleansing, exception monitoring, and compliance reporting. A complete BI toolset provides the requisite flexibility for dealing with reporting period changes and discrepancies that result from mergers and acquisitions, including direct drill-through to daily postings from aggregated data in a data warehouse.

Being able to access live data throughout the enterprise makes it much easier to obtain correct data. Most BI environments include a graphical user interface to simplify the development of new reporting applications and a dynamic chart of accounts to produce “self-maintaining reports,” with no need to reload the data warehouse just because changes are made.

At BMO Bank of Montreal, business analysts formerly had to wade through paper reports to collect and combine risk management information, then use complex reporting algorithms to analyze the data. Now, they use BI tools to quickly generate and deliver reports over the bank’s intranet. Analysts can drill down in seconds to a single branch, freeing up hundreds of hours to work with customers and analyze data. The bank identifies problems more quickly and responds proactively to opportunities.

“Previously, it would take days to accurately gather and present monthly financial information,” confirms John Veltkamp, manager of systems programming and design in the bank’s Technology and Solutions Group. “Now, our managers can review and analyze balance sheets, income statements, and other reports in minutes, which allows them to see the results of new initiatives much earlier and respond more quickly to opportunities and challenges.”

Education – SEVIS Reporting to the INS

In today’s environment of heightened terrorist awareness, rigorous reporting and tracking of foreign visitors is becoming the norm in just about every industry. For example, educational institutions need to provide information about foreign exchange students to comply with Student and Exchange Visitor Information System (SEVIS) requirements. Every institution that admits international students or hosts exchange visitors and scholars must share demographic, academic, and immigration-related information electronically with the Immigration and Naturalization Service (INS).

“IT organizations must understand that ‘SEVIS-compliant’ does not mean just another simple data transmission; it requires a major change in process, organizational relationships, and data interfaces on campus,” points out Patty Croom and Kathy Bellows in the EDUCAUSE Quarterly.

“In some cases, portions of the data to be collected have never before been recorded electronically. In others, gathering the necessary data will require combining data from two or three existing campus information systems.”⁴

An effective SEVIS information system must not only gather student data, but also track information on visiting scholars – including researchers and professors who contribute to the intellectual environment. Data about visiting scholars might be stored in multiple locations, such as human resource databases and student information systems.

Creating the necessary INS reports calls for a unique combination of front-end reporting and back-end data integration technology. A complete business intelligence environment can enable this type of closed-loop information flow – accessing information from any source, delivering it to a SEVIS batch processing system in the specified format and distributing compliance tracking and problem detection/resolution information to authorized stakeholders.

⁴ Croom, Patty and Bellows, Kathy, “Understanding the Student and Exchange Visitor Information System (SEVIS),” EDUCAUSE QUARTERLY, Number 3, 2002.

Corporate Reporting and Internal Governance

Apart from any formal legislation or government mandate, every company has myriad reporting issues to contend with. Managers can't wait until the end of the month to evaluate strategy decisions or compute corporate performance gains. They want to know where the business stands at any given moment so they can proactively satisfy customers and meet corporate goals.

The job of satisfying these reporting requirements often falls on the shoulders of information technology (IT) professionals, who typically rely on business intelligence software to lend cohesion to a diverse information landscape. When properly deployed, enterprise business intelligence and reporting tools can deliver information in a variety of ways to many types of people, both inside and outside the enterprise.

Financial professionals, in particular – from CFOs to controllers to analysts – need to be able to access and analyze real-time information from multiple business units to obtain a complete picture of corporate performance. In a recent survey conducted by CFO Research Services, 56 percent of senior finance executives cited technology as the primary hindrance to financial accuracy and visibility. CFOs need to develop systems that can collect, organize, and disseminate information, with the goal of providing true visibility into the operational drivers of share price and the unexpected events that impact valuation.

This implies unique needs, for example, the ability to dynamically read varying hierarchies such as charts of accounts. Dynamic posting allows financial users to generate new summary statements off individual detailed reports, as well as to transfer balance sheet items across years. Embedded roll-up routines use stored, dynamic, or combined reports to simplify rounding issues, and fully integrated OLAP capabilities streamline the transition from summary reporting to analytical processing.

Real-time data sharing between financial and related non-financial processes – such as transaction-processing and enterprise resource planning (ERP) systems – ensures data consistency and accuracy, allowing managers to consolidate inter-company balances and business unit totals prior to reporting, shortening the close cycle.

In addition to reporting, most companies need fast, cost-effective data integration to create accurate snapshots of financial performance. An auditable, single-step process can load consolidated data, eliminating the possibility of error that multi-step processes introduce.

Direct access to many types of data sources is also important. Financial professionals want out-of-the-box access to popular ERP packages (SAP, PeopleSoft, J.D. Edwards, and Lawson, to name a few) along with the ability to directly read multidimensional cubes such as Hyperion Essbase.

For example, USFilter, a \$4 billion company with hundreds of offices, plants, and factories throughout North America, purchased BI tools to help analysts with specific reporting needs related to its J.D. Edwards financial systems. “In order to satisfy our financial reporting requirements, we need software tools that can pull data from multiple business centers, integrate it into a common format, and send it to many different recipients,” explains Michaeline Megahan, a project manager in the Business Systems Development and Integration Group at USFilter.

According to Megahan, it used to take several analysts 10 hours or more to create the required reports at the end of each month. Now the entire data-capture and reporting process is automated with business intelligence technology. USFilter depends on these tools to generate complex financial reports, maintain budgets, track financial performance, and comply with industry-specific regulatory requirements. Because the BI tools create a dynamic Chart of Accounts, there is no need to create a separate database each time a new set of reports is created. This saves the company about two weeks worth of work whenever they go through budgeting exercises. “Our analysts can not only create their monthly reports more easily, but they can obtain point-in-time General Ledgers from the individual J.D. Edwards systems whenever they wish,” says Megahan.

Users can select monthly, quarterly, and year-to-date summaries from the J.D. Edwards data, with budgeted and actual costs shown at whatever levels they desire. These users can view information in a variety of common business formats, including Excel, HTML, and PDF. Additionally, reports can be “pushed” to designated users via e-mail, either on a scheduled basis or as alerts when critical business conditions arise – such as when expenditures exceed budgeted items. A single report can be automatically bursted into multiple sections and then delivered simultaneously to many different users, allowing department managers, for example, to receive customized profit and loss reports.

Achieving Compliance With Business Intelligence Technology

Of course, finance is just one piece of the corporate governance puzzle. There are many good reasons why companies wish to standardize the way they produce and share information. Having a unified reporting layer ensures consistency in the way information is accessed, delivered, presented, and stored. Additionally, it can dramatically reduce the expenses associated with deploying and maintaining the environment.

Different users have different needs. Financial analysts require robust analysis tools. Production managers want to receive alert-based reports, meaning they want to be notified when certain conditions change. Sales managers want to receive periodic summaries, yet have the ability to drill down into the data when something perks their interest. Line-of-business managers need action statements that allow them to set other activities in motion. Executives want to be notified via pagers or cell phones when certain thresholds are reached.

An effective BI environment must be able to cost-effectively accommodate all of these scenarios – broad data access, enterprise-scale reporting, ad hoc queries, online analytical processing (OLAP), real-time information delivery, and portal integration – all backed by flexible development tools, comprehensive security, and built-in management utilities.

Here is a summary of what most organizations are looking for:

- An easy-to-use portal interface, enabling executives and other financial professionals to track key performance indicators (KPIs) to measure the health of the business at any point in time
- The ability to bring data directly into Excel or save reports as Excel files, providing financial professionals with a familiar tool while preventing data-entry errors
- Easy but powerful data analysis and the ability to drill down to real-time posted transactions – ideally, while in Excel – giving analysts the ability to quickly and simply research problem areas in detail
- Ad hoc reports that let managers discover and immediately communicate changes in the business
- A built-in audit trail that gives independent auditors an in-depth view of financial activity at any point in time
- Auditable report management that enables financial professionals to prove compliance if questioned

- Role-based security to ensure the proper flow of information throughout and beyond the organization
- Real-time reporting (within 48 hours) of material events that could affect a company's financial performance, with the ability to consolidate data at report time
- Access to all data in the enterprise
- A common view of information to facilitate collaboration among analysts, financial professionals, and high-level corporate executives
- The ability to deliver information to any appropriate party, within or outside the organization, in any electronic or print format

About Information Builders

For more than 28 years, Information Builders has been providing award-winning technology and superior service to leading organizations around the globe. That's why more than 12,000 customers worldwide – including most of the Fortune 100 and most U.S. federal government agencies – rely on us to turn their enterprise data into actionable information that drives business results.

Our comprehensive approach to enterprise business intelligence improves fiscal accountability for the organization, streamlining essential activities for the executives who must certify financial reports. Information Builders' technologies deliver robust enterprise and financial reporting capabilities that allow users to access, disseminate, and analyze any corporate information in a secure, auditable, and flexible way. Together with the powerful data integration solutions provided by iWay Software, an Information Builders company, our solutions provide all the tools and functionality needed to turn compliance challenges into opportunities for competitive advantage.

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DN7504447.0104

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Printed in the U.S.A.
on recycled paper