

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELOUISE PEPION COBELL, et al.,)
)
Plaintiffs,)
)
v.)
)
P. LYNN SCARLETT, Acting Secretary)
of the Interior, et al.,)
)
Defendants.)
_____)

Case No. 1:96CV01285
(Judge Lamberth)

**NOTICE OF FILING OF INTERIOR DEFENDANTS'
TWENTY-FIFTH STATUS REPORT**

Interior Defendants hereby give notice of the filing of their twenty-fifth report due in accordance with the Order of December 21, 1999.

A copy of the report is attached hereto.

Dated: May 1, 2006

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that, on May 1, 2006 the foregoing *Notice of Filing of Interior Defendants' Twenty-fifth Status Report* was served by Electronic Case Filing, and upon the following, who is not registered for Electronic Case Filing, by facsimile:

Earl Old Person (*Pro se*)
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/s/ Jay St. John
Jay St. John



THE SECRETARY OF THE INTERIOR
WASHINGTON

MAY 01 2006

J. Christopher Kohn
U.S. Department of Justice
Civil Division
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P.O. Box 875
Ben Franklin Station
Washington, D.C. 20044-0875

Re: Cobell v. Norton – Status Report to the Court Number Twenty-Five

Dear Mr. Kohn:

Enclosed is the Department of the Interior's *Status Report to the Court Number Twenty-Five* (For the Period January 1, 2006 through March 31, 2006). Please forward a copy to the Court.

This is the 18th report in the revised Report format. My signature on this Report reflects my belief that the information provided to me by others is correct to the best of my knowledge

Thank you for your assistance.

Sincerely,

A handwritten signature in black ink that reads "P. Lynn Scarlett".

P. Lynn Scarlett
Acting Secretary

Enclosure

Status Report to the Court Number Twenty-Five

For the Period
January 1, 2006 through March 31, 2006



May 1, 2006

May 1, 2006

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I. INTRODUCTION

This *Status Report to the Court Number Twenty-Five* (Report) represents the period from January 1, 2006, through March 31, 2006. The Report is presented for the purpose of informing the Court of actions taken since the issuance of the preceding quarterly report. In addition, the Report references some matters that might be of interest to the Court, including delays in and obstacles to trust reform activities, and a report on the progress of the historical accounting of individual Indian beneficiary funds managed by Interior.¹

This Report is prepared in a manner consistent with previous reports to the Court. Managers from the Office of the Chief Information Officer, Bureau of Indian Affairs, Bureau of Land Management, Minerals Management Service, Office of the Special Trustee for American Indians, and Office of Historical Trust Accounting submit reports on the status of their respective Indian trust activities.

A change in the Report format Interior brings to the Court's attention is that there will not be a Secretary's Observations section in this Report. The Acting Secretary, P. Lynn Scarlett, will sign the Report as part of the transmittal of the Report to the Court.

A glossary of acronyms and abbreviations is included in this Report. The glossary is located at the end of the Report.

¹ This Report contains information on the broad trust reform efforts underway at Interior. Accordingly, it may include information on reform efforts that are not within the scope of the *Cobell* litigation.

A. INFORMATION TECHNOLOGY

Introduction

This section describes the status of Interior IT systems, particularly the systems that house or provide access to IITD or provide various computing capabilities, including functions critical to the proper administration of the individual Indian trust responsibilities within Interior. In addition, this section describes various efforts being made to improve IITD security within Interior, pursuant to OMB Circular A-130 Appendix III, and the status of Internet connectivity.

Accomplishments and Completions

Computer Security:

The primary focus for this reporting period has been remediation of weaknesses, reduction of open POA&M items, and IT security policy. Interior continued to make progress in enhancing IT security, through continuous monitoring of Internet-accessible systems and implementing corrective actions for weaknesses identified by the Interior penetration tests and audits of financial systems. The most noteworthy accomplishments, completions and challenges during the reporting period are described below.

ESN:

- Two Internet gateway routers were replaced with newer and more capable equipment. This upgrade is expected to enhance security and increase availability of Internet services.
- BLM reconfigured Denver and Portland interfaces to the ESN to create a more consistent, layered approach to the perimeter security, including intrusion prevention systems, firewalls, routers, and application firewalls.

Prevention and Monitoring:

- Interior continued its external perimeter extended vulnerability scan testing of Internet-accessible systems, using capabilities established at ESN. As of the end of this reporting period, all identified critical or major vulnerabilities in trust systems were either remediated or were identified as false positives.
- Interior continued deployment of the Interior-wide internal scanning tool for BOR, NPS, FWS and OST. Interior also continued refining the internal scanning process in order to reduce the number of false positives. Reducing false positives should allow Interior to focus on remediating actual vulnerabilities.
- BLM procured, configured and implemented a security event log consolidation and evaluation program that provides increased security response, including custom coding an automated quarantine tool to deny access to BLM resources to all potentially hostile contacts.

- There were no successful security incidents detected during this reporting period that resulted in the compromise of trust systems or data.

Policies and Guidance

- The Interior CIO issued “Information Resources Management (IRM) Internal Control Review (ICR) Guidance for FY 2006” to the heads of bureaus and offices on January 31, 2006. This directive transmitted Interior’s “Guidelines for FY 2006 Internal Control and Audit Follow-up Programs,” dated November 4, 2005, that requires performing annual ICR assessments by evaluating the security controls in place for all IT systems contained in Interior’s IT system C&A master list.
- The Interior Chief Information Security Officer and OIG agreed to “Rules of Engagement for IT Security Penetration Testing” on February 9, 2006. This document provides a framework of procedures and guidelines to be followed by OIG, its contractor and Interior in performing the independent evaluation of Interior’s public-facing network infrastructure and ESN. It establishes the test objective, scope, timeframe, rules, and points of contact.
- The Interior CIO issued “Software Piracy” to the heads of bureaus and offices on February 14, 2006. This directive sets Interior’s policy for the prevention of software piracy.
- The Interior CIO issued “Fiscal Year 2006 (FY06) Annual End-user Federal Information Systems Security Awareness Training” on February 17, 2006, and “Fiscal Year 2006 (FY 2006) Annual End-user Federal Information Systems Security Awareness Training” on March 10, 2006, to the assistant secretaries and heads of bureaus and offices. These memoranda require that all personnel, including contractors and other external authorized users, with access to DOI information systems complete training that satisfies the annual FISMA requirement. It also mandates the use of a centralized source to standardize the training across Interior.
- The Interior Deputy Secretary issued “Approval of the Interior's Enterprise Architecture” to the heads of bureaus and offices on February 27, 2006. This memorandum endorses the Interior’s IT Investment Review Board approval of the IEA as outlined in Version 2.0 of the ETP. The ETP provides a sequencing plan that describes the business transformation efforts required to move Interior from its current state to the target architecture. The ETP is in alignment with guidance from OMB.
- The Interior CIO issued “Plan of Action and Milestones (POA&M) Process Standard” to the heads of bureaus and offices on February 27, 2006. This revised guidance provides a set of standards and procedures for developing and maintaining

- bureau and office POA&Ms for identifying weaknesses, managing remediation, and providing quarterly reporting to OMB.
- The Interior CIO issued “Interim Guidance for the Certification and Accreditation of Information Technology Systems” to the heads of bureaus and offices, SOL, OIG, and bureau and office CIOs on March 14, 2006. This directive provides guidance on the C&A process to be used throughout Interior regarding implementation of the NIST Special Publications 800-37, 800-18, 800-30, 800-34, 800-47, 800-53, 800-60, and FIPS Publications 199 and 200.
 - The Interior CIO issued “Information Technology (IT) System Inventory Requirements” to the heads of bureaus and offices on March 20, 2006. This directive provides supplemental guidance to OCIO Directive 2004-010 “Population and Maintenance of the Department of the Interior Enterprise Architecture Repository” on system inventory requirements.
 - The Interior CIO issued “Instant Messaging, Internet Relay Chat, Web Conferencing, and Peer-to-Peer Usage Policy” to the assistant secretaries, and heads of bureaus and offices on March 20, 2006. This directive establishes usage policy and procedures for various collaborative programs. It also mandates standardization and technical controls to ensure the computing environment and data remain secure.
 - MMS issued security requirements for all network users to read and acknowledge the FY2006 MMS IT rules of behavior, which apply to all MMS IT systems.

Training and Awareness

- Training was held for users of DEAR’s new reporting and C&A self-guided capabilities in DC and Denver, a step-by-step process that allows for standardized and consistent input of data. The new enhancements to DEAR provide for one authoritative data source that links each information system to an overall C&A boundary, thus improving oversight and reporting with respect to FISMA requirements. Training focused on:
 - Assuring roles, processes, and tasks for collecting and maintaining information were clearly defined and reviewed;
 - Performing quality assurance checks on the information contained in DEAR using the new reporting features;
 - Using NIST Special Publication 800-60 guidance to assess the appropriate confidentiality, integrity and availability ratings of an accreditation boundary.

Plans of Action and Milestones:

- Interior reduced POA&M weaknesses by 9.6 percent during this reporting period. Interior remediated and closed out 327 weaknesses. Interior continues to address the remaining 1,211 open weaknesses.

A-130 Certification and Accreditation:

- BIA reviewed and updated all trust system security plans to be compliant with NIST Special Publications 800-60 and 800-53 standards. This included following the FIPS Publication 199 guidelines to determine the appropriate security categorization (high, medium, or low) for each system. NIST Special Publication 800-53 requires the selection and employment of appropriate security controls for an information system based upon the security categorization of the system.
- BIA performed tests on a new document scanning module for TAAMS. The test results will be evaluated to assess the impacts, if any, that the introduction of the module will have on the system as a whole.
- BIA completed the ST&E and C&A documentation of the Trust Network Root Enterprise Active Directory system and is reviewing for submission to the DAA.

E-Authentication and HSPD-12:

- BLM has transferred existing Smartcard technology to NBC for implementation of HSPD-12 Personal Identification Verification (PIV-II) requirements.

Staffing:

- Interior filled several key positions this reporting period, including a Deputy CIO, IT Security Project Manager, IT Enterprise Security Architect, IT Security Trust Officer and an Information Systems Security Officer, OST Deputy CIO, and BIA IT Security and Privacy Deputy Office Director and Security Engineer.

Current Status

A-130 Certification and Accreditation:

- All trust systems have full ATO status except for one. The one exception is a BIA legacy system called the Land Ownership Tracking System. The system was operating under an IATO valid for 90 days from December 19, 2005. The IATO for this system is expected to be renewed and remain valid until the system is retired, which is expected by the end of CY2006. The risk of continued operation under an IATO has been determined to be necessary since the system is required for BIA to conduct its business.

ZANTAZ:

- The contract to restore the ZStage tapes was awarded. All bureaus and offices affected by the ZStage issue from the last reporting period sent their tapes to ZANTAZ.
 - OST sent 112 backup tapes and all were restored without incident.
 - SOL sent 97 backup tapes and restoration is expected to be complete by the end of June 2006.
 - NBC Denver sent 57 backup tapes and restoration is expected to be complete by the end of June 2006.

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Information Technology

- NBC DC sent 409 backup tapes and restoration is expected to be complete by the end of June 2006. Three tapes have not been sent because of national security issues.
- BIA sent 280 backup tapes. Of the 280 tapes sent, 268 of these tapes are blank and 12 tapes have only partial data. BIA sent a technician to ZANTAZ in an attempt to confirm whether the tapes were blank. On March 31, 2006, BIA sent ZANTAZ one tape that it believes may contain some of the data that would have been captured on the 280 tapes.

- The NBC Denver servers were upgraded on January 27, 2006, to correct the ZStage issues reported in the last reporting period.

- BLM shipped a new router to the ZANTAZ Las Vegas data center for the connection to the archive servers. The new router is part of a technology refresh effort and will include implementing a buffer server between the BLM forwarder and the ZANTAZ data center. This will provide up to two weeks of buffer space in the event that connectivity to the datacenter is interrupted for an extended period.

- BIA deployed a ZStage Alert script in late November 2005. During this period, the ZStage Alert script noted problems in three areas have been referred to ZANTAZ for further investigation.
 - A misconfiguration by one user caused that user's messages not to reach ZANTAZ. BIA expects to coordinate with ZANTAZ to deliver whatever messages can be recovered to the digital safe.
 - Notification messages informing the user of e-mail delivery failures were not being captured by ZANTAZ. Messages which the user attempted to send, but which were not actually sent, were captured by ZANTAZ. Therefore, ZANTAZ will show a discrepancy between the senders' and receivers' e-mail collections.
 - A process irregularity occurred whereby an incorrect ZStage value indicated that the e-mail was not captured when it actually has been. This created a false negative in the ZStage value.

REPORTS:

These reports were among those issued during this reporting period.

FISMA

- OMB issued "FY 2005 Report to Congress on Implementation of The Federal Information Security Management Act of 2002," on March 1, 2006. This report informs Congress and the public of the Federal government's security performance, and provides OMB's assessment of government-wide information technology security strengths and weaknesses and a plan of action to improve performance. It provides key security performance measures from FY2002 through FY2005 for each agency, based on the report issued by each agency's OIG. While Interior does not believe the FISMA report reflects the current status of Interior's information technology security, Interior

acknowledges that the report identified some important areas that need improvement. These areas include, but may not be limited to network security, POA&M, and C&A.

- The House Government Reform Committee issued the “Federal Computer Security Grades - 2001-2005” on March 16, 2006. This document is compiled by the Committee from FISMA reports submitted to Congress by agency CIOs and OIGs. The Committee report, based on the FY2005 report issued by Interior’s OIG, indicates Interior’s grade moved from “C+” in FY2004 to an “F” in FY2005. Interior is concerned that the FY2005 congressional FISMA report card did not reflect the current status of its information technology security.
- The Interior CIO, in a letter to Congressman Davis, Chairman of the House Government Reform Committee, stated that the FISMA report “did not reflect the current status of [Interior’s] information technology security ... despite further improvements to [Interior’s] IT security.” The letter notes the following “accomplishments that strengthened [Interior’s] IT security”:
 - Provided \$1.1 million to OIG for penetration testing in all bureaus;
 - Certified and accredited 98 percent of IT systems, with 100 percent quality assurance reviews;
 - Trained 98.7 percent of the workforce in user security awareness;
 - Ensured that 67 percent of IT security specialists completed role-based training;
 - Increased the number of certified security professionals from 63 to 86;
 - Survived 650 million probes and attacks, with only a couple of web defacements, through sophisticated vulnerability scanning and enhanced intrusion detection and prevention devices;
 - Consolidated 13 networks into one with added security services;
 - Reduced Internet Service Providers from 35 to 5, which created simpler and more effective perimeter security;
 - Developed eight enterprise software and hardware agreements for standardization, cost efficiencies, and increased security;
 - Received OMB’s top ranking for Interior’s enterprise architecture with an integrated security architecture;
 - Submitted 60 IT investment proposals to OMB: each received passing IT security scores and OMB approval, and security was given special review in each case;
 - Established qualified project managers on major IT projects;
 - Maintained a privacy program recognized as a best practice by the Industry Advisory Council; and,
 - Completed the first departmental IT security assessment through an independent contractor. The nine major program areas received ratings of four good, four satisfactory and one unsatisfactory.
- GAO issued “INFORMATION TECHNOLOGY: Agencies Need to Improve the Accuracy and Reliability of Investment Information (Report No. GAO-06-250),” to Congressional Requesters on January 12, 2006. The report responds to a Congressional

request to determine the extent to which selected agencies have underlying support for their FY2006 investment information. It emphasizes the use of the GAO-developed IT Investment Management framework in implementing capital planning processes and notes Interior to be among those agencies using the IT Investment Management Framework. Interior was cited as having made significant improvements.

- The Interior IG issued “Security Vulnerabilities at the Information Technology Center Place Sensitive Data at Risk (Report No. NSM-EV-OSS-0004-2006),” on January 17, 2006. The report details IT security vulnerabilities that would allow unauthorized users access to sensitive data located on the NBC network. The concern was that the Information Technology Center could be physically entered by anyone with access to the Main Interior Building. NBC has developed and implemented corrective actions for a majority of the vulnerabilities. Corrective actions have been developed and prioritized as POA&Ms for the remaining vulnerabilities identified in the report.
- OMB issued “Report to Congress on the Benefits of the President’s E-Government Initiatives,” on January 20, 2006. This report provides a status update to Congress on E-Government initiatives which were approved by the President’s Management Council. Initiatives included E-Authentication and the security line of business.
- BIA and ESN issued “NBC Network Security Recommendations Report.” The report, developed in collaboration with NBC, provides recommendations for improving the security of BIA connections to NBC applications and is intended to prevent the possibility of access to sensitive BIA data and systems from users on the NBC network. This has a low risk of occurrence and a configuration change has been developed and programmed for implementation to correct the weakness.

MRM Legacy Media

As previously reported, MRM expected to dispose of 30,000 legacy backup tapes that contain data redundant to data in the new MRMSS. Due to objections by tribal litigants, MRM has postponed the disposal of these tapes pending resolution of objections.

Delays and Obstacles

Like other federal agencies, Interior must address many challenges regarding the integration, performance, funding, security, and data integrity of IT systems. Interior initiated or completed steps to address some of the challenges reported in this and previous reporting periods. However, delays and obstacles listed below impede progress in achieving Interior’s IT management goals.

Litigation

- Delays caused by last summer’s extensive collection and production of documents and by Court appearances continue to put Interior several months behind in completing many required IT and IT security activities. These include completing corrective actions from

audits and on POA&Ms, updating of required security policies and procedures, and implementing initiatives critical to continued improvements in IT security.

- Employee fears about becoming personally implicated in the *Cobell* litigation continue to undermine communication and decision-making, and are contributing factors to low employee morale.

Staffing

- Interior is experiencing high staff and management turnover in critical IT positions, particularly IT security. Recruitment challenges to attract qualified candidates continue, particularly in light of litigation impacts. The CISO position remains vacant and the Department's IT security staff is at 70 percent.

Funding and Resources

- OCIO, along with Interior bureaus and offices, is responding to an extraordinary level of scrutiny, including OIG evaluations and audits, GAO evaluations and audits, and OMB required reviews. With the significant increase in review, Interior is expending considerable efforts in data collection, document production and related workloads, which diminishes the resources available for IT security-related activities. For example, staff has less time to implement and test security controls.
- Funding availability will continue to dictate the timing of IT-related initiatives. Interior's FY2006 budget will require managing a variety of IT-related requirements and tradeoffs. Interior continues to prioritize its IT security needs in its budget requests within fiscal constraints.

Denied Internet Access

- Several Interior bureaus and offices (BIA, OHA, OST and SOL) have not been permitted by the Court to have Internet access since December 5, 2001. Lack of Internet access impedes work processes and the ability to communicate effectively, both internally and externally. For example:
 - Coordination and dissemination of new policies and training is delayed due to the need to deliver material physically. Even after receipt, considerable re-work is required to tailor web-based training programs to run locally.
 - Policy discussion is hampered due to additional time required in coordinating group discussions via teleconferencing when e-mail collaboration would be more appropriate and timely.
 - Ensuring Continuity of Operations and Continuity of Government through the implementation of contingency plans requires rapid notification of an event. The lack of Internet access degrades Interior's capabilities to notify all of its bureaus and offices in a timely and efficient manner.

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Information Technology

- Maintaining security on internal systems is more difficult without access to the Internet for research, reporting, and patch management.
- The concerns over potential future Court-ordered Internet shutdowns or other Court-ordered disruptions create uncertainty over how to proceed with enterprise initiatives and security improvements. Contingency planning for either external or internal disconnections (and all potential permutations) takes resources from planned and daily activities.

Assurance Statement

I concur with the content of the information contained in the Information Technology section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 20, 2006

Name: *Signature on File*
W. Hord Tipton
Interior Chief Information Officer

B. CADASTRAL SURVEY

Introduction

Cadastral surveys provide assurance that land boundaries for individual Indian and tribal trust lands are identified appropriately. By federal law, surveys of Indian lands are to be performed under BLM's direction and control. Official surveys, whether preexisting or new, identify the location of land boundaries of Indian trust assets and determine official acreage. The official surveys are integral to realty transactions, resource management activities, litigation support and the federal system of patent, allotment and survey records maintained by BLM. Ownership information, distribution of trust assets, and management of trust accounts may be related to or based upon information recorded in official surveys.

Accomplishments and Completions

BLM Indian Lands Surveyors

During this reporting period, the FTM goal to hire and locate 12 BLM Indian lands surveyors for the 12 BIA Regions was accomplished, with the final six surveyors having reported to duty.

The BLM Indian lands surveyors for Eastern, Navajo, Pacific, Rocky Mountain, Southwest and Western Regions reported to their respective duty locations in this reporting period. All BLM Indian lands surveyors are actively working with BIA staff and others in addressing survey boundary issues.

Current Status

Interior Standards for Indian Trust Lands Boundary Evidence

Reviews of the draft Standards for Indian Trust Lands Boundary Evidence (previously referred as Draft Boundary Standards) were received from the Office of the Solicitor, Division of Land and Water Resources, Branch of Public Lands, and the Division of Indian Affairs, Branch of General Indian Legal Affairs. The SOL comments were integrated into the revised draft. The updated draft will be provided to the Directives Coordinator, Office of Planning and Performance Management, Assistant Secretary - Policy Management and Budget for inclusion in the Departmental Directives system.

Implementation of the FTM

During this reporting period the FTM goals continued to be implemented. These goals as they relate to cadastral survey are: (1) funding for the 12 BLM Indian lands surveyors located in the BIA Regions; (2) creation of the Certified Federal Surveyor program (where state licensed land surveyors can be certified to perform commercial activities under the direction and control of BLM); (3) improving the maintenance of the Public Land Survey System within Indian Country;

and (4) creation of one standardized source of land status information based on cadastral data that delineates the official legal land descriptions.

The main focus of the CFedS program for this reporting period was the development of the training program. The training will be offered through distance learning. Approximately 30 hours of the planned 50 hours of video lecture were developed, and several web-based problems and case studies nearly completed. The draft manual and handbook for the administration and oversight of the CFedS program are in review. It is anticipated that the CFedS program should assure better survey integrity, and should increase the production of surveys.

An inventory of the survey conditions for all exterior boundaries on 325 Indian reservations was prepared during this reporting period as part of the FTM implementation. The inventory consists of information about the condition and era of the survey monumentation (on-the-ground survey markers) along with their extent and location. This inventory will serve as the basis for prioritizing funding allocations and the commitment of resources to meet BLM's fiduciary trust responsibilities.

Delays and Obstacles

Disconnection from the Internet

The Court-ordered disconnection from the Internet continues to adversely impact the way communications are handled between BLM, BIA, OST and SOL, including the way CARS is being implemented and the review of the Interior Indian Trust Lands Boundary Standards. BLM's productivity has decreased, and the cost associated with dual networks has caused the cost of survey services to increase. This issue continues to impact BLM's ability to provide cadastral services in an effective and cost efficient manner to clients.

Funding of the FTM

Planning and scheduling of out-year FTM work is dependent on future funding.

Assurance Statement

I concur with the content of the information contained in the Cadastral Survey section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 19, 2006

Name: *Signature on File*
Donald A. Buhler
Chief Cadastral Surveyor
Bureau of Land Management

C. MINERALS MANAGEMENT SERVICE

Introduction

Minerals Revenue Management, an MMS program, is responsible for collecting, accounting for, and distributing mineral revenues from both federal and Indian mineral leases, and for evaluating industry compliance with laws, regulations and lease terms. MRM maintains reported information and distributes revenues at the lease level. BIA maintains individual Indian ownership records that are used to provide information to OST for disbursement of the lease revenues to individual Indian beneficiaries.

Current Status

Indian Oil Rule

MMS continued with the rulemaking process for the valuation of oil produced from tribal and allotted Indian lands. The proposed rule was published in February 2006, and the comment period ended on April 14, 2006.

Payment Receipt Date Verification

MMS continues to work with its contractor on system modifications to finalize a listing of prior data errors in the Indian mineral revenue distribution file. The data listings will be provided to BIA, OST, and any affected tribes.

MRM Legacy Media

As previously reported, MRM expected to dispose of 30,000 legacy backup tapes that contain data redundant to data in the new MRMSS. Due to objections by tribal litigants, MRM has postponed the disposal of these tapes pending resolution of objections.

Assurance Statement

I concur with the content of the information contained in the Minerals Management Service section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 20, 2006

Name: *Signature on File*

Cathy J. Hamilton
Chief of Staff
Minerals Revenue Management
Minerals Management Service

D. OFFICE OF HISTORICAL TRUST ACCOUNTING

Introduction

OHTA was established by Secretarial Order No. 3231 on July 10, 2001, and is charged with planning, organizing, directing and executing the historical accounting of IIM and tribal trust accounts. Since its 2001 inception, neither OHTA nor its contractors have stored the IIM transaction data used to perform historical accounting on a system connected to the Internet.

Current Status

Judgment and Per Capita IIM Accounts

OHTA continues to perform historical accounting procedures on Judgment and Per Capita IIM accounts. During this reporting period, OHTA reconciled an additional 3,818 Judgment IIM accounts and 2,022 Per Capita IIM accounts.

Results through March 31, 2006, are summarized in the table below.

	<u>Judgment Accounts</u>		<u>Per Capita Accounts</u>	
	<u>Number of Accounts</u>	<u>Percent of Total</u>	<u>Number of Accounts</u>	<u>Percent of Total</u>
Total at December 31, 2000 (including accounts open at or after October 25, 1994, but closed prior to December 31, 2000)	80,539	100%	19,033	100%
Reduction for accounts subsequently determined to be outside of the scope of the population	(835)	(1%)	N/A	N/A
Reconciled January 1, 2001, through December 31, 2005	(50,519)	(63%)	(15,086)	(79%)
Reconciled this reporting period	(3,818)	(5%)	(2,022)	(11%)
Remaining to be reconciled at March 31, 2006	<u>25,367</u>	<u>31%</u>	<u>1,925</u>	<u>10%</u>

Mailings to Judgment and Per Capita IIM Account Holders

On March 9, 2006, a fourth submission for permission to mail 20,402 Historical Statements of Account was filed with the U.S. District Court. The third submission to mail 28,107 Historical Statements of Account was filed on March 24, 2005. Mailing of these 48,509 Historical Statements of Account awaits approval from the Court.

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Office of Historical Trust Accounting

In its October 22, 2004, Order, the Court permitted OHTA to transmit Historical Statements of Account to 17,096 Judgment IIM account holders; of this number, 4,974 Statements could not be sent because the account holders were classified as WAU. OHTA has been working with OST and contractors to identify addresses for the WAU account holders. During this reporting period, OHTA mailed 826 Historical Statements of Account to account holders for whom addresses had been located, bringing the total number of Statements mailed to 12,948. OHTA will re-mail any of these Statements that are returned as forwarding addresses become available.

OHTA SDA Distribution Project - Undistributed SDA Balances at December 31, 2002

During this reporting period, 148 SDA involving \$826,508 were resolved and distributed. There remain 11,670 SDA involving \$18,530,532 to resolve and distribute. Distributions of SDA balances to rightful owners during the period January 1, 2003, through March 31, 2006, total \$39,840,578, including interest of \$2,878,375 posted from January 1, 2003, through the date of distribution.

Imaging/Coding – Individual Indian Trust Documents

During this reporting period, OHTA completed scanning 456,262 pages, coding 73,041 documents and loading 116,493 documents into ART. All documents are checked for quality and accuracy before they are loaded into ART for reconciliation.

Accounting Standards Manual

As previously reported, periodic revisions are routinely made to the *Accounting Standards Manual*. Another revision was issued on March 17, 2006.

Accounting Plan

As previously reported, Interior expects to modify the January 6, 2003, accounting plan. Modifications will be based on lessons learned from the work already completed, court decisions, statistical sampling parameters, accounting costs, and the history of congressional funding.

Delays and Obstacles

Enacted appropriations for FY2003 through FY2006 have been below the President's requests, thus limiting the historical accounting that could be performed.

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Assurance Statement

I concur with the contents of the information contained in the Office of Historical Trust Accounting section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 24, 2006

Name: *Signature on File*
Bert T. Edwards, Executive Director
Office of Historical Trust Accounting

II. OFFICE OF THE SPECIAL TRUSTEE FOR AMERICAN INDIANS

Introduction

The Office of the Special Trustee for American Indians was created by the American Indian Trust Fund Management Reform Act of 1994. The 1994 Act provides direction to the Department of the Interior on accounting for Indian trust funds and reforming the operation of the Indian fiduciary trust. The Special Trustee's responsibilities under the Act include creating a comprehensive strategic plan for the operation of the trust and providing oversight of the accounting for Indian trust funds and the reform of the trust.

Special Trustee's Observations

During this reporting period, work continued in the Rocky Mountain and Great Plains BIA region offices toward conversion of IT systems and reengineering business processes. Meetings were held with officials of these two regions to help develop plans for the conversion process.

The Interior Regulatory Initiative working group held two consultation sessions during this reporting period. Attendees included Interior officials and tribal representatives, among others. Publication of proposed regulations in the Federal Register is expected to begin during CY2006.

Continued absence of Internet connectivity continues to cause loss of productivity and requires use of expensive, alternative methods to obtain and transmit information. Appraisers often travel to access public Internet systems for research of local property values in order to prepare appraisals. BLM surveyors are often delayed in getting access to information to perform survey work. Probate specialists are wasting many hours of time attempting to locate prospective heirs while using telephone and fax resources instead of the Internet. In addition, by accessing Internet databases, OST could locate account holders whose whereabouts are unknown and distribute funds to them.

Internet is a key delivery mechanism for communications and services to individuals and Tribes, and must be available to Indians and Tribes as access becomes available. With Internet access, many account holders would be able to obtain account and asset information "online" rather than having to use the call center or make personal visits to field offices. The President of the National Congress of American Indians, Joe Garcia, during the fourth annual State of the Indian Nations address said, "Because of our often-remote location relative to superior professional services, it is crucial for us to join the telecommunications revolution of distance learning, telemedicine, public safety, e-commerce, and electronic government. Not enough Indians have access."

During this reporting period, one hearing was held by the Senate Indian Affairs Committee and a second hearing was held jointly with Senate Indian Affairs and the House Resources Committee regarding a proposed *Cobell* settlement bill S. 1439. Congressional leaders have strongly indicated they would like to see an end to the litigation in favor of more direct use of resources in the trust reform area. Also, during this reporting period, staff from these two committees were

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Office of the Special Trustee for American Indians

hosted at the Lenexa record center where they saw the approximately 300 million pages of records, including trust records, the indexing project and the record imaging project, followed by a demonstration of the accounting tool that reconciles IIM accounts to the source documents.

During this reporting period, Secretary Norton advised Congress that the proposed FY2007 budget for trust management, including the ongoing trust reform efforts, is \$536 million. This budget includes funding for BIA trust asset management responsibilities, accounting and distribution of trust funds by OST, funding for the OHTA historical accounting efforts and tribal litigation work, as well as funding for the Indian land consolidation project. In addition, funding for trust reform activities including the conversion to new technology at all BIA locations, encoding of documents and cleanup of records is included in the budget.

The FY2007 budget includes a requested increase of \$25.4 million from this year's budget for the Indian land consolidation program. Fractionation is one of the most challenging problems in Indian country. This money will help direct attention to acquiring the most highly fractionated tracts of land.

The budget also includes an increase of \$6.5 million for other trust programs. This money is expected to provide survey work, including adding a cadastral surveyor in each BIA region, continue support of the probate project and to assist Tribes in their development of energy resources on reservations.

Assurance Statement

The comments and observations are provided by the Special Trustee for American Indians and reflect the opinion of the Special Trustee only.

Date: April 21, 2006

Name: *Signature on File*
Ross O. Swimmer
Special Trustee for American Indians

A. TRUST REVIEW AND AUDIT

Introduction

OTRA reports directly to the Special Trustee for American Indians. OTRA was created by OST as a response to trust initiatives developed during the tribal consultation process of 2002. OTRA conducts performance audits, examinations and reviews of Interior entities as well as Tribes that manage fiduciary trust activities. Examinations are routinely conducted at locations that perform trust operations, and are planned to result in a performance rating. Also, compliance reviews are undertaken in response to information and complaints received from beneficiaries, employees and the public.

Current Status

Indian Trust Examinations

During this reporting period, OTRA performed seven trust reviews. Nine draft reports were issued for comment and ten final reports were issued.

OTRA completed four trust record assessments and issued five final reports during this reporting period.

During this reporting period, OTRA started follow-up on the findings in the reports already issued. Twenty-six letters were sent to regions, agencies and Tribes asking for updates on the findings reported in our reviews. OTRA received three responses by the end of this reporting period.

Compliance Reviews

During this reporting period, nine cases were in inventory. Three reviews were closed. Field work or report drafting continued on the remaining cases.

Delays and Obstacles

Lack of Internet access impedes OTRA's work processes and its ability to communicate effectively, both internally and externally.

Assurance Statement

I concur with the content of the information contained in the Trust Review and Audit section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 28, 2006

Name: *Signature on File*

D. Jeff Lords

Director, Office of Trust Review and Audit

Office of the Special Trustee for American Indians

B. OST-OFFICE OF THE CHIEF INFORMATION OFFICER

1. RECORDS MANAGEMENT

Introduction

The Office of Trust Records was established in 1999 to develop and implement a program for the economical and efficient management of trust records, consistent with the 1994 Act, the Federal Records Act, and other statutes and implementing regulations. The OTR records management program has been developed and implemented, and continues to evolve, to ensure that necessary Indian records are maintained, records retention schedules are consistent with retention needs, and records are safeguarded throughout their life-cycles.

Accomplishments and Completions

American Indian Records Repository

Approximately 136,471 indexed boxes are located in the AIRR as of the end of this reporting period. As previously reported, OTR has historically reported the number of boxes transferred to AIRR for storage. However, NARA uses cubic feet as the measure for records stored. Thus far, NARA reports that they are currently storing 142,433 cubic feet of indexed inactive records at AIRR. Some boxes are larger than one cubic foot (e.g., map boxes).

Records Indexing Project

Indexing of approximately 138,425 boxes has been completed as of the end of this reporting period. The number of completed boxes (indexed and quality reviewed) differs from the number of boxes stored at AIRR because not all completed boxes were sent to AIRR from the Annex before the end of the reporting period.

Approximately 3,890 boxes of inactive records were moved from BIA/OST field locations to the Lenexa Annex for indexing during this reporting period. Once indexed, these boxes will be stored in the AIRR.

Training

OTR provided records management training for 121 BIA and OST identified records contacts and 51 tribal employees during this reporting period.

Equipment Purchases

242 pieces of fireproof filing equipment were delivered to BIA, OST and tribal offices during this reporting period.

Current Status

Safeguarding Records

As reported, 283 boxes of inactive records that were or may have been damaged or contaminated by mold, mildew, mouse droppings or other adverse elements were shipped to NARA for remediation in June 2005. As reported in the OTR Activity Report for November 2005, the number of boxes increased to 289 as a result of holdings maintenance being performed. Some boxes cannot hold the entire contents of the original box and are placed in an “overflow box” which is kept with the original box.

OTR reported in December 2005 that 145 boxes were released by NARA and sent for indexing and storage in the AIRR. NARA subsequently informed OTR that the number released in December 2005 was actually 146 boxes. Of the 143 boxes (289 – 146)² remaining to be treated by NARA, 48 of 60 boxes requiring holding maintenance were completed; 12 of 21 boxes requiring humidification flattening were completed; and 37 of 54 boxes requiring conservation treatment were completed. The completed boxes have been sent to the Annex for indexing. NARA anticipates that the remaining 46 original boxes will be completed by the end of April 2006, except for those materials which are beyond NARA’s capabilities to repair.

Records Retention Schedules

During this reporting period, OTR received approval from the Archivist of the United States for the following five BIA electronic systems records schedules: MADS, Keyfile System, GLADS, Alaska Title Plant Data Base, and Land Title Mapper. The Archivist also approved the Box Index Search System records schedule.

Records Evaluation

As previously reported, 31 boxes set aside for evaluation remain at OTR in Albuquerque pursuant to a litigation hold. There has been no change during this reporting period.

Records Management Policies and Procedures

As reported in the OTR Activity Report for February 2006, OTR was notified of allegations of destruction of trust and non-trust records at the BIA Fort Defiance Agency. OTR and OTRA conducted a joint examination of the allegations and concluded that approximately one cubic foot of documents, comprised of original incomplete sand and gravel permits (which were considered to be records) and non-record duplicate copies of archaeological clearances and reports were shredded by Agency staff. As a follow-up to the destruction of records at the BIA Fort Defiance Agency, OTR provided records management briefings specifically targeted to the

² The OTR Monthly Activity Reports for January and February 2006 inadvertently referenced the original number of 283 boxes.

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Records Management

managers of BIA programs in the BIA Navajo Region. The purpose of the training was to reinforce the record keeping responsibilities of managers.

Also as reported in the OTR Activity Report for March 2006, OTR received a request from the OST Northwest Regional Fiduciary Trust Administrator to conduct an investigation into possible unauthorized destruction of federal records or non-records material stored at the OST field office in Portland, on or about February 16, 2006. OTR and OTRA conducted a joint examination March 28 – 30, 2006. It is anticipated that a report will be prepared in the next reporting period.

Delays and Obstacles

Lack of Internet access continues to hinder OTR's ability to provide remote access to the record index database for authorized users of the records. If Internet access were available, authorized researchers could conduct their searches from their respective work sites and only visit AIRR when necessary to inspect specific boxes or request documents from specific boxes.

Assurance Statement

I concur with the content of the information contained in the Records Management section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 20, 2006

Name: *Signature on File*

Ethel J. Abeita

Director, Office of Trust Records

Office of the Special Trustee for American Indians

C. TRUST ACCOUNTABILITY

1. TRUST BUSINESS PROCESS MODELING

Introduction

Interior is working to build a highly effective fiduciary trust services organization by implementing the business objectives contained in the CTM. Those business objectives are being used to guide implementation of the FTM. Implementation of the FTM is a collaborative effort of BIA, OST, BLM, MMS and OHA, and is integrated with Interior's other trust reform initiatives. The FTM is being implemented to transform the current trust business processes into more efficient, consistent, integrated and fiscally responsible business processes that meet the needs and priorities of the beneficiaries.

Accomplishments and Completions

Standardized leasing and permitting, rights-of-way, and LTRO handbooks were adopted by BIA. The final standardized handbooks were distributed at the March 2006 National BIA Realty Conference.

Based on the skill sets developed in the previous reporting period, BIA revised its position description for new hires in key trust realty positions.

Current Status

As a part of the DOI Regulatory Initiative, reengineering staff participated in the consultation meetings, evaluated comments received and also participated in revising the draft regulations.

The reengineering staff also participated in the initial drafting of new rights-of-way and appraisal regulations with BIA and OAS. It is expected that these regulations will become a part of the Regulatory Initiative.

Validation of managerial skill sets is continuing and is expected to be completed during the next reporting period. Once completed, the skill sets will be used to update the current position descriptions. This will allow supervisors to determine additional training needs for managers to perform their jobs in accordance with FTM requirements.

Reengineering staff conducted follow-up site visits to further assess post-conversion activities and lockbox implementation at pilot agencies. A report on the site visits will be available during the next reporting period. Recommendations are expected to be included as a part of the report.

Initial drafting began of the following handbook chapters: Sales and Exchanges of Tribal Trust or Restricted Land; Negotiated Sales, Gifts and Exchanges of Individually Owned Lands; Tribal Tract Purchases; Consolidation by Sale of Highly Fractionated Tracts; Partitions in Kind; and

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Trust Business Process Modeling

Mortgages and Deeds of Trust. The Fluid Minerals handbook and Sand, Gravel and Aggregates handbook have been delivered to BIA.

The reengineering staff began documenting the impact of the lock box process on existing procedures in order to develop DOPs for future use.

Two of three sections of the DOPs for Reporting and Reconciliation have been drafted and are in review. All three sections are expected to be completed during FY2006.

Delays and Obstacles

Lack of Internet access impedes communication with other trust bureaus and offices, and hinders the expansion of reengineered processes that utilize the Internet. This exacerbates the sheer complexity of reengineering the existing trust business processes.

Assurance Statement

I concur with the content of the information contained in the Trust Business Process Modeling section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: May 1, 2006

Name: *Signature on File*
Margaret Williams
Deputy Special Trustee, Trust Accountability
Office of the Special Trustee for American Indians

2. TRUST DATA QUALITY AND INTEGRITY

Introduction

The success of trust reform depends, in part, on the accuracy of data generated from the maintenance of trust assets, ownership of trust assets, distribution of trust income, and management of trust accounts. The DQ&I project focuses on three primary initiatives: (1) assisting BIA with document encoding into the trust systems, (2) validating/correcting CDE to their respective source documents and (3) implementing Post-QA processes.

Accomplishments and Completions

During this reporting period, TPMC's contractors:

- Conducted DQ&I site assessments for the Ft. Hall Agency, Yakama Agency, EORO-LTRO and the SWRO-LTRO.
- Completed encoding of encumbrance documents into TAAMS Leasing for Horton, Pawnee and Shawnee Agencies.
- Validated beneficiary ownership data for Horton Agency and Pawnee Agency land tracts. Provided these Agencies and LTRO with a tract-level summary of identified variances for further research and corrections, if necessary.

Current Status

The DQ&I Project expanded to include NWRO-LTRO; Ft. Hall and Yakama Agencies; EORO-LTRO and SWRO-LTRO. Operations continued for: (1) SPRO, (2) GPRO, (3) Pima Agency, (4) PRO-LTRO, (5) RMRO and (6) Miami Agency. Through the project, agencies and regions:

- Continued validation/correction of Shawnee Agency beneficiary ownership data.
- Performed additional global ID changes in TAAMS Title for SPRO, achieving 84% completion.
- Scanned 5,853 active encumbrance documents at RMRO-LTRO to prepare for future validation/correction task.
- Recorded an additional 2,315 for a total of 4,333 documents at RMRO-LTRO.
- Encoded missing required data into TAAMS Title for 4,932 RMRO-LTRO encumbrance documents, allowing the full record to be mapped electronically into TAAMS Leasing.

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Trust Data Quality and Integrity

- Initiated encoding of active encumbrance documents into TAAMS Leasing at Rosebud Agency.
- Scanned encumbrance documents for Crow Creek, Lower Brule, Yankton, Sisseton and Ft. Totten Agencies. Utilized scanned images to conduct the Post-QA task on BIA encoding into TAAMS Leasing for these locations.
- Analyzed ownership data for 155 Miami Agency tracts and provided assistance with researching and correcting variances identified.
- Continued encoding of active encumbrances into TAAMS Leasing for Miami Agency.

Delays and Obstacles

Lack of access to the Internet has resulted in: (1) communication delays; (2) adverse project coordination issues; (3) increased administrative program costs; and (4) the overall DQ&I project being unable to take full advantage of available information technology.

Assurance Statement

I concur with the content of the information contained in this Trust Data Quality and Integrity section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 21, 2006

Name: *Signature on File*
John E. White
Trust Reform Officer
Office of the Special Trustee for American Indians

3. INDIAN FIDUCIARY TRUST TRAINING PROGRAM

Introduction

Interior has a continuing responsibility to provide adequate staffing, supervision and training for trust fund management and accounting activities. Fiduciary trust training is essential to the success of Interior's trust reform efforts and forms an integral part of all training for Interior employees who are involved in the management of Indian trust assets.

Accomplishments and Completions

OST offered two sessions of the course, *Fiduciary Overview Program*, presented by Cannon Financial Institute, with 57 OST, BIA and tribal personnel attending during this reporting period. A total of 793 people have attended this course since March 2003. This course compares and contrasts the federal Indian trust administered through Interior with private sector trusts administered through banks and other financial institutions.

During this reporting period, Cannon Financial Institute personnel presented all six of the specialty courses to 100 OST, BIA and tribal personnel. The specialty courses, *Risk Management, Probate, Trust Accounting, Asset Management, Fiduciary Behavior* and *Guardianships* are part of the *Certified Indian Fiduciary Trust Specialist* certification program as described in previous reports.

During this reporting period, OST training staff conducted 10 training sessions in TFAS, CSS, StrataVision and the historical query database for 60 OST, BIA and contractor staff.

OST and BIA staff presented the three-day course, *Trust Fundamentals*, to 21 OST, BIA and tribal staff. This course includes such topics as the history and policy of Indian trust, current trust reform activities, job roles and responsibilities, and organization and working relationships.

Current Status

During this reporting period, 11 OST personnel attended the *Certified Indian Fiduciary Trust Specialist* review and exam session, and are expected to receive their certifications during the next reporting period.

Dedication ceremonies for the NIPTC are scheduled for Thursday, April 27, 2006.

Delays and Obstacles

The lack of Internet access inhibits electronic communication with other governmental agencies and contractors, hinders the research of training tools and potential contractors, and restricts OST's ability to access online training programs.

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Indian Fiduciary Trust Training Program

Assurance Statement

I concur with the content of the information contained in the Indian Fiduciary Trust Training Program section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 19, 2006

Name: *Signature on File*

Dianne M. Moran

Director, Trust Training

Office of the Special Trustee for American Indians

4. RISK MANAGEMENT

Introduction

The objectives of the risk management initiative are to design, deliver, and implement a comprehensive risk management program that includes extensive management controls for monitoring and evaluating Interior's Indian trust asset management program. The risk management program continues to be implemented by TPMC. OTRA monitors and evaluates management corrective action plans to mitigate control deficiencies.

Accomplishments and Completions

During this reporting period, a revised concept of operations was developed to administer a comprehensive risk management program for Indian trust assets in order to capture the new requirements of OMB Circular A-123. In addition, a Senior Management Council and Senior Assessment Team were established in OST as required by the revisions to A-123.

OST updated and closed out 60 corrective action plans that mitigated identified risks. The remaining corrective action plans are expected to be completed during the next reporting period.

Current Status

RM-PLUS content for OST trust programs is under review to meet the revised OMB Circular A-123 requirements. These revisions became effective in FY2006 and include strengthening requirements for documentation, monitoring and reporting.

TBCC RM-PLUS content is still under development and is expected to be completed during the next reporting period.

OST continues to work with OSM and BLM on the IT security requirements to allow training to begin on the RM-PLUS tool in order for them to conduct their risk assessments.

During FY2006, OST expects BIA to update and/or close out its open corrective action plans from FY2005.

Delays and Obstacles

The lack of Internet access complicates the implementation and use of RM-PLUS, since it is designed as a web-based application.

Assurance Statement

I concur with the content of the information contained in the Risk Management section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: May 1, 2006

Name: *Signature on File*
Margaret Williams
Deputy Special Trustee, Trust Accountability
Office of the Special Trustee for American Indians

5. REGULATIONS, POLICIES AND PROCEDURES

Introduction

OTP in OST was established on April 21, 2003, to assist Interior in establishing “consistent, written policies and procedures for trust fund management and accounting” as stated in the 1994 Act. OTP oversees and facilitates the development, promulgation and coordination of trust-related regulations, policies, procedures and other materials to guide the proper discharge of Interior’s fiduciary responsibilities. OTP is separate from BIA’s PPA, which is responsible for policies, procedures and regulations affecting all BIA activities. PPA activities thus are reported in the BIA section of the reports to the Court.

Accomplishment and Completions

25 CFR 1200 – American Indian Trust Fund Management Reform Act. During this reporting period the technical amendments were submitted in final form and published in the Federal Register.

Current Status

The OST Directives System Handbook is awaiting final approval from OST management. Publication of the handbook is expected during the next reporting period.

Work on the Reporting and Reconciliation DOP, which includes procedures for reconciling financial transactions and preparing financial statements, as well as reporting to Treasury, IRS and beneficiaries, was realigned after priorities were established among various DOP chapters. Groups of completed processes were circulated for surnaming; drafting and review continues on the remainder. Approval and issuance of the entire DOP is expected during the next reporting period.

Proposed changes to the Account Maintenance DOP and the Disbursing DOP, specific to the Osage Nation, were reviewed by field staff. Upon completion of management review, the DOPs will be put into the surname process. Final issuance is now expected in the next reporting period.

Delays and Obstacles

Lack of access to the Internet and its repository of online statutes, the Federal Register and other resources continues to present challenges to this office.

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Regulations, Policies and Procedures

Assurance Statement

I concur with the content of the information contained in the Office of Trust Regulations, Policies and Procedures section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: May 1, 2006

Name: *Signature on File*

Philip Viles, Director

Office of Trust Regulations, Policies and Procedures

Office of the Special Trustee for American Indians

D. FIELD OPERATIONS

1. APPRAISAL

Introduction

The Office of Appraisal Services, under a management contract with NBC-ASD, is responsible for Indian land valuations. The contract was established to provide impartial estimates of market value for a variety of real property interests on land owned in trust or restricted status by individual Indians, Alaska Natives, and Indian Tribes. Various regulations governing Indian trust lands require valuations. To meet this requirement, an appraisal or other valuation method is used to determine fair market value of Indian lands.

Accomplishments and Completions

A Deputy Chief Appraiser for Policy and Compliance and a Deputy Chief Appraiser for OAS Operations were hired and reported for duty during the reporting period.

The position of the director of OME was filled during this reporting period, and the office is expected to be fully staffed during the next reporting period. The OME will perform mineral evaluation services in support of ILCA.

OAS has contracted to develop an automated Indian Trust Appraisal Request Tracking System (ITARS), conduct a fractionated interest study, and provide appraisal services.

Current Status

ASD, in coordination with OST, continues to conduct a comprehensive analysis of OAS staff and training requirements. Temporary review appraisers continue to be used to reduce the backlog. The use of contracted appraisal services is expected to provide additional support in Rocky Mountain and Northwest to supplement the existing workforce.

A department-wide appraisal policy handbook, which incorporates the OAS handbook section, was completed in draft form and circulated for comment. The handbook is expected to be issued in final form before the end of FY2006.

Appraisal Backlog

As of this reporting period, the appraisal backlogs are as follows:

Region	Appraisal Backlog As of 12/30/05	Appraisal Backlog * As of 03/31/06
Northwest	285	166
Rocky Mountain	758	661
Midwest	62	42
Western	153	69
Southwest	12	15
Eastern Oklahoma	85	75
Navajo	30	80
Pacific	0	4
Alaska	407	399
Eastern	0	0
Southern Plains	4	45
Great Plains	5	0
TOTAL	1,801	1,556

* The backlog includes all requests from BIA whether or not they are required for a proposed transaction. The requests are addressed in priority order based on factors such as court-ordered transactions, economic transactions, and rights-of-way transactions. The remaining appraisal requests for which no transaction is pending may appear on the backlog list until appraisal staff has completed priority assignments.

This table does not include appraisal backlog information from the compacted and contracted Tribes. This information is being requested from the tribes and is expected to be included in the next report.

Delays and Obstacles

The inability to utilize the Internet as a tool to communicate with outside contacts to research comparable sales and other information is a continuing hardship.

Difficulties continue in recruiting qualified appraisers for permanent, temporary and contract positions, particularly in remote locations.

Assurance Statement

I concur with the content of the information contained in the Appraisal section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: May 1, 2006

Name: *Signature on File*
Brian M. Holly, MAI
Appraisal Services Directorate
National Business Center

E. TRUST SERVICES

1. CURRENT ACCOUNTING ACTIVITIES

Introduction

Current accounting activities focus on: (a) whereabouts unknown accounts; (b) trust funds accounting system; (c) special deposit accounts; (d) small balance accounts; and (e) accounting discrepancies.

WAU are classified as such for various reasons, including (1) new accounts established without an address, (2) mail returned for invalid address and (3) account holder refused or did not claim mail. A variety of methods and means are used to locate WAU account holders.

TFAS is a generic term for a COTS trust fund accounting system that provides the basic receipt, accounting, investment, disbursing and reporting functions common to commercial trust funds management operations.

SDA are temporary accounts for the deposit of trust funds that cannot immediately be credited to the proper account holders. As explained in the BIA/OST Interagency Procedures Handbook, this type of account is to be used only as an exception to the rule that trust funds immediately be deposited to the credit of, and then distributed as soon as practicable to, the individual and tribal beneficiaries. The SDA project has two sub-projects: the retrospective (pre-January 1, 2003, receipts) and the prospective (post-December 31, 2002, receipts) phases. OHTA has responsibility for "resolution" (i.e., research and distribution of funds) of the retrospective phase, while BIA has comparable responsibility for the prospective phase. This section of the report to the Court thus addresses only the prospective phase.

Small balance accounts are defined as those with balances of \$.01 - \$1.00 and no activity in the preceding eighteen months. Management expenses for these accounts are considerable, in part because (as directed by Congress) annual statements must be sent to these account holders.

Various accounting discrepancies that existed prior to the conversion to TFAS still need research and resolution. Some may impact individual accounts. At present, OST has a daily and monthly reconciliation process in place to ensure that transactional reporting to Treasury is accurate and that any discrepancies are researched and reconciled during the next accounting period. While this process ensures resolution of current discrepancies in timely fashion, separate research and reconciliation efforts are needed to address the pre-TFAS discrepancies.

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Current Accounting Activities

a. Whereabouts Unknown Accounts

Current Status

During this reporting period, 5,421 accounts with a combined balance of \$3 million were added to the WAU list, and 3,663 account holders with a combined balance of \$7.5 million were located.

Priority continues to be placed on securing current addresses for account holders of the rolling top 100 highest dollar balance WAU accounts. During this reporting period, 21 of the top 100 WAU accounts, with combined account balances in excess of \$2.9 million, were updated with current addresses.

As of March 31, 2006, there were 46,450 WAU accounts with a combined balance of \$61,372,720. The following table illustrates the number of accounts stratified by account balance and WAU category.

Account Balance	Correspondence/ Check Returned	Account Setup No Address	Awaiting Address Confirmation	Refused/ Unclaimed Mail	Total
Equal to or over \$100,000	16	9	0	0	25
Under \$100,000 and equal to or over \$50,000	37	10	0	0	47
Under \$50,000 and equal to or over \$5,000	1,905	808	0	1	2,714
Under \$5,000 and equal to or over \$1,000	5,850	1,530	3	7	7,390
Under \$1,000 and equal to or over \$100	7,939	3,040	12	2	10,993
Under \$100 and equal to or over \$1	11,301	4,748	19	3	16,071
Under \$1	3,139	6,048	20	3	9,210
Total	30,187	16,193	54	16	46,450

Delays and Obstacles

The influx of WAU accounts categorized as "Account Setup No Address" causes the total number of WAU accounts to remain relatively constant. These accounts primarily result from a lack of current addresses for individual heirs named in probate orders or recipients of per capita distributions. Also, accounts are being created in TFAS for non-financial asset owners in order

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May 1, 2006

Current Accounting Activities

to generate asset statements. Many of these owners do not have current addresses. As a result, the total number of WAU is expected to increase significantly.

There presently are 16,422 supervised IIM account holders (minors, emancipated minors, adults in need of assistance, and non-compos mentis) coded as WAU. Updating supervised account addresses coded as WAU presents a challenge, since BIA Social Services must verify and update the address changes to these accounts.

The lack of Internet access limits communication effectiveness. OST and its contractor must rely primarily on mail and telephone communication with IIM account holders.

b. Trust Funds Accounting System

Accomplishments and Completions

During this reporting period, the remaining agencies in the Southern Plains Region and the Miami Agency from the Eastern Oklahoma Region were converted to the TAAMS Leasing module. The interface between TAAMS and TFAS allows for quarterly account statements of performance to be produced for beneficiaries, including ownership and encumbrance information of trust assets located in Southern Plains Regional LTRO.

c. Special Deposit Account Activity

Current Status

BIA has the responsibility for distribution of SDA funds received since January 1, 2003 (prospective receipts). It is the policy of BIA to distribute funds within 30 days of receipt into SDA. During this reporting period, there were 13,623 receipt transactions posted to SDA. Of these, 2,074 were undistributed and aged more than 30 days as of March 31, 2006.

During this reporting period, aged funds were held in 16 fewer SDA than in the previous reporting period. Undistributed aged receipts decreased by 5,176 and the combined dollar amount decreased by \$1,779,963.51. As of March 31, 2006, funds were held in SDA with a combined dollar amount of \$1,984,760.47, which represented 4,109 undistributed receipts aged over 30 days from January 1, 2003, through March 31, 2006. As of March 31, 2006, there were 695 receipts in 188 SDA aged more than one year for a combined dollar amount of \$441,021.35.

During this reporting period, OST contractors continued to assist the Fort Belknap Agency to reduce its backlogs by encoding probate orders into BIA's IRMS. Reducing backlogs assists agencies with their SDA distribution efforts. OST staff and contractors also assisted BIA staff in performing work necessary to distribute aged receipts at the Pima, Eastern Navajo, Fort Hall, Northern Idaho and Coeur d'Alene Agencies.

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Current Accounting Activities

Delays and Obstacles

Lack of use of the Internet continues to delay access to information useful to resolving SDA.

d. Small Balance Accounts

As of March 31, 2006, there were 15,842 accounts that have a \$.01 - \$1.00 balance with no activity for the previous 18 months. The total sum included in those accounts is \$2,548.19. Statements are sent to account holders for these accounts on an annual basis pursuant to direction from Congress.

e. Accounting Discrepancies

As previously reported, Interior submitted to Congress a legislative proposal to resolve the approximate \$6 million difference between the subsidiary account ledger (liabilities) and the investment pool (assets). Additional and detailed information regarding the proposal was submitted to congressional staff during this reporting period.

Assurance Statements

I concur with the content of the information contained in the Accounting Discrepancies subsection of the Current Accounting Activities section of the *Status Report to the Court Number Twenty-Five*. The information provided in this subsection is accurate to the best of my knowledge.

Date: April 27, 2006

Name: *Signature on File*
Charlene Toledo
Deputy Special Trustee, Trust Services
Office of the Special Trustee for American Indians

I express no opinion on the content of the Accounting Discrepancies subsection, above. I concur with the content of the information contained in the balance of the Current Accounting Activities section of the *Status Report to the Court Number Twenty-Five*, and this information is accurate to the best of my knowledge.

Date: May 1, 2006

Name: *Signature on File*
Margaret Williams
Deputy Special Trustee, Trust Accountability
Office of the Special Trustee for American Indians

III. BUREAU OF INDIAN AFFAIRS

A. TRUST REGULATIONS, POLICIES AND PROCEDURES

Introduction

The Office of Planning and Policy Analysis (PPA) in the Office of the Assistant Secretary – Indian Affairs was established on April 21, 2003. PPA is responsible for developing and promulgating Indian Affairs directives. PPA is separate from OST's Office of Trust Regulations, Policies and Procedures, whose activities are reported in the OST section of the status reports to the Court.

Accomplishments and Completions

Grants of Easement for Right-of-Way on Indian Lands – The handbook was completed and issued to all Regions during this reporting period.

Land Titles and Records – The handbook was completed and issued to all Regions during this reporting period.

Leasing and Permitting – The handbook was completed and issued to all Regions during this reporting period.

Indian Probate – The draft handbook was issued to all Regions during this reporting period.

Current Status

Regulatory Initiative – Preliminary draft regulations have been distributed to Indian Affairs staff and Tribes as part of the consultation effort prior to publication in the Federal Register. During this reporting period, two consultation sessions were held. Publication of the regulations is expected to begin during CY2006.

25 CFR 216 – Surface Exploration, Mining, and Reclamation of Lands – The project is on schedule, with publication of the proposed revisions expected during the third quarter of CY2006.

25 CFR 162 – Leases and Permits, Subparts C and D – Residential Leases and Business Leases – Publication of this rule is expected during FY2006.

25 CFR 224 – Tribal Energy Resource Agreements – This rulemaking is required by the Energy Policy Act of 2005, which mandates the Secretary to establish and implement an Indian energy resource development program. This rule is expected to establish a cohesive and comprehensive means of development of energy resources on tribal trust lands. Tribal consultations were held during the last reporting period. The proposed rule is expected to be published in the second quarter of CY2006.

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Trust Regulations, Policies and Procedures

25 CFR 292 – Gaming on Trust Lands Acquired After October 17, 1998 –The proposed rule establishes the criteria that the Department will consider when determining whether a parcel of land acquired in trust after October 17, 1988, qualifies under any of the exceptions listed in 25 U.S.C. 2719. During this reporting period, draft regulations were distributed to tribal leaders. The proposed rule is expected to be published during the second quarter of CY2006.

Delays and Obstacles

Lack of access to the Internet has hindered PPA’s ability to research statutes and departmental manuals and makes distribution of documents for review by Tribes more difficult and costly.

Assurance Statement

I concur with the content of the information contained in the Trust Regulations, Policies and Procedures – BIA section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 20, 2006

Name: *Signature on File*

Debbie L. Clark

Deputy Assistant Secretary – Indian Affairs (Management)

Bureau of Indian Affairs

B. FRACTIONATION

Introduction

Fractionation of Indian trust and restricted land stems from the federal Indian policy of the 19th Century. Fractionation occurs as land passes from one generation to the next and more and more heirs or devisees acquire an undivided interest in the land. This is a complex and potentially emotionally-charged issue, due primarily to cultural differences, historical legacy and family associations of the present owners with the original Indian owners of those lands. Efforts to address this complex issue are coordinated primarily through the BIA Indian Land Consolidation Office, which seeks to help Tribes make use of the opportunities offered by the Indian Land Consolidation Act, as amended in 2004. ILCO is operating several acquisition projects and, from there, a nationwide plan is being implemented to promote consolidation of the ownership of Indian land.

Accomplishments and Completions

- Acquired 10,941 fractional interests during this reporting period, for a cumulative total of 213,716 interests for ILCP in the Midwest, Northwest, Western, Eastern Oklahoma, Navajo, Rocky Mountain and Great Plains Regions.
- Of the total interests acquired, 86% were interests of less than 2% ownership in the respective tracts of land.
- Acquired a cumulative total equivalent of 245,122.18 acres for the project reservations.

Current Status

ILCO proposed a new strategy during this reporting period, including refocusing its acquisition activities on reservations with the most highly fractionated tracts. The proposal is under review by the TESC, and a decision is expected during the next reporting period. "Highly fractionated" is defined as tracts having 200 or more interests.

ILCO is discontinuing acquisition activities for three reservations that contain fewer highly fractionated tracts. During this reporting period, three reservations with more highly fractionated tracts were added to the program. Acquisition on these reservations is expected to begin during FY2006 and FY2007.

Other ILCP activities include:

- Coordinating with OAS and LTRO to prepare for acquisitions at reservations added to the program.
- Continuing to target and acquire additional *Youpee* interests.
- Continuing implementation of LCTS. The LCTS project is expected to be completed during FY2006.

Delays and Obstacles

- Probate and LTRO backlogs and *Youpee* issues continue to impede acquisitions.
- Lack of Internet access results in slower processing of applications from potential sellers and hinders searches for WAU account holders.
- Delay in obtaining land and mineral values impedes acquisitions.

Assurance Statement

I concur with the content of the information contained in the Fractionation section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: April 13, 2006

Name: *Signature on File*

Brenda Walhovd

Program Specialist, Indian Land Consolidation Office

Bureau of Indian Affairs

C. PROBATE

Introduction

Federal law permits Indian owners to pass title to their trust assets by testamentary devise or by intestate succession, and imposes upon Interior the duty of determining the legal heirs. BIA, OHA and OST must coordinate their work to complete the probates of Indian estates. Information on the status of probates is contained within the ProTrac system. Each BIA regional office and corresponding agency is responsible for encoding new cases, examining “initial load” cases and making corrections. Data-cleanup continues in an effort to make ProTrac a more complete source of probate data.

Current Status

Case Preparation

According to ProTrac, 8,308 probate cases are in the case preparation stage.

Case Adjudication

According to ProTrac, 5,022 probate cases are in the case adjudication stage. As reported by OHA, deciding officials received 1,622 cases and issued decisions in 1,114 cases. OHA reported 3,942 cases pending.

Case Closure

According to ProTrac, there are 3,620 cases in the closing stage. Cases in the closing stage are ones that have been adjudicated but not distributed in TFAS, LTRO, or in the Lease Distribution System. According to ProTrac, 2,702 cases have been closed during this reporting period.

Financial Case Closure

OST reported that it distributed funds and closed 1,868 accounts in TFAS, representing 1,786 estates. As of the end of March 2006, TFAS contained 30,580 open estate accounts, which is an increase of 212 from the 30,368 estate accounts at the end of the last reporting period.

Probate Handbook

Publication was delayed and is expected to be completed during the next reporting period.

Delays and Obstacles

The following obstacles have been identified as having an impact on the progress of the probate program:

- Lack of access to the Internet, which includes the inability to use electronic mail communication between OHA and BIA/OST;
- Continued fractionation of ownership of Indian lands;
- Numerous initiatives competing for resources (e.g., *Youpee* revestitures, *Cobell* requirements);
- Cultural diversities regarding the subject of death;
- BIA probate reorganization has not been completed.

Assurance Statement

I concur with the content of the information contained in the Probate section of the *Status Report to the Court Number Twenty-Five*. The information provided in this section is accurate to the best of my knowledge.

Date: May 1, 2006

Name: *Signature on File*
William Titchywy
Acting Special Projects Director
Western Region
Bureau of Indian Affairs

ACRONYMS AND ABBREVIATIONS

1994 Act (or Act)	American Indian Trust Fund Management Reform Act of 1994
A-130	Office of Management and Budget Circular A-130 Appendix III
ADM	Attorney Decision Makers
AFMSS	Automated Fluid Mineral Support System
AIMS	ActivCard Identity Management System
AIPRA	American Indian Probate Reform Act
AIRR	American Indian Records Repository
ALIS	Alaska Land Information System
ALJ	Administrative Law Judges
ARO	Alaska Region office
ARRTS	Appraisal Request and Review Tracking System
ART	Accounting Reconciliation Tool
AS-IA	Assistant Secretary-Indian Affairs
ASD	Appraisal Services Directorate
ATO	authority to operate
BIA	Bureau of Indian Affairs
BIAM	Bureau of Indian Affairs Manual
BISS	Box Index Search System
BLM	Bureau of Land Management
BOR	Bureau of Reclamation
BPA	Blanket Purchase Agreement
BRM	Business Reference Model
C&A	Certification and Accreditation
CARS	Cadastral Automated Request System
CDE	Critical Data Elements
CFedS	Certified Federal Surveyor
CFI	Continuous Forest Inventory
CGI	Software vendor successor to TAAMS vendor
CGIS	Cadastral Geographic Information Systems
CIFTA	Certified Indian Fiduciary Trust Analyst
CIFTS	Certified Indian Fiduciary Trust Specialist
CIO	Chief Information Officer
CIRC	Computer Incidents Response Center
CISSP	Certified Information System Security Professional
CMS	Credential Management System
COTS	Commercial off-the-shelf
CPIC	Capital Planning and Investment Control
CSIRC	Computer Security Incident Response Capability
CSIRT	Computer Security Incident Response Team
CSS	Customer StrataStation
CTM	Comprehensive Trust Management Plan
DAA	Designated Approving Authority
DEAR	DOI Enterprise Architecture Repository

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Acronyms and Abbreviations

DDoS	Distributed Denial of Service
DLRM	DOI Land and Resource Management
DM	Departmental Manual
DMZ	De-Militarized Zone
DNS	Domain Name Server
DOI	Department of the Interior
DOP	Desk Operating Procedure
DoS	Denial of Service
DQ&I	Data Quality and Integrity
DRM	Data Reference Model
EA	Enterprise Architecture
ENA	Eastern Navajo Agency
EORO	Eastern Oklahoma Region office
ERO	Eastern Region office
ESN	Enterprise Services Network
ETP	Enterprise Transition Plan
FAMS	Facilities Asset Management System
FAR	Federal Acquisition Regulation
FFMIA	Federal Financial Management Improvement Act
FIMO	Farmington Indian Minerals Office
FIPS	Federal Information Processing Standards
FISMA	Federal Information Security Management Act
FMFIA	Federal Managers' Financial Integrity Act
FRC	Federal Records Center
FRD	Functional Requirements Document
FTM	Fiduciary Trust Model
FTO	Fiduciary Trust Officer
GAO	Government Accountability Office
GCDB	Geographic Coordinate Data Base
GIS	Geographic Information System
GLO	General Land Office
GLADS	Great Lakes Agency Database System
GPRO	Great Plains Region office
GPS	Global Positioning System
GSA	General Services Administration
GSS	General Support Systems
HSPD-12	Homeland Security Presidential Directive 12
IAM	Indian Affairs Manual
IATO	Interim Approval to Operate
ICR	Internal Control Review
IEA	Interior Enterprise Architecture
IFTR	Indian Fiduciary Trust Records
IG	Inspector General
IIM	Individual Indian Money
IITD	Individual Indian Trust Data

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Acronyms and Abbreviations

ILCA	Indian Land Consolidation Act
ILCO	Indian Land Consolidation Office
ILCP	Indian Land Consolidation Project
IM	Instruction Memorandum
InfoDat	Indian Forestry Database
Interior	Department of the Interior
IP	Internet Protocol
IPJ	Indian Probate Judges
IPv6	Internet Protocol Version 6
IQCS	Incidence Qualification and Certification System
IRM	Information Resources Management
IRMS	Integrated Records Management System
IRS	Internal Revenue Service
ISA	Information Security Assessment
IT	Information Technology
ITARS	Indian Trust Appraisal Request Tracking System
IV&V	independent verification and validation
LAN	Local area network
LCTS	Land Consolidation Tracking System
LMS	Learning Management System
LR2000	Legacy Rehost 2000 System
LRIS	Land Records Information System
LTIC	Land Tenure in Indian Country
LTRO	Land Titles and Records Office
MA	Major Applications
MAD/LCP	Management Accounting Distribution/Land Consolidation Program
MADS	Management Accounting Distribution System
MMD	Missing Mandatory Documents for Unrestricted Accounts
MMS	Minerals Management Service
MOU	Memorandum or Memoranda of Understanding
MRM	Minerals Revenue Management
MRMSS	Minerals Revenue Management Support System
MWRO	Midwest Region office
NARA	National Archives and Records Administration
NBC	National Business Center
NILS	National Integrated Lands System
NIPTC	National Indian Programs Training Center
NIST	National Institute of Standards and Technology
NPS	National Park Service
NRO	Navajo Region office
NWRO	Northwest Region office
O&G	Oil and Gas
OAS	Office of Appraisal Services
OCIO	Office of the Chief Information Officer
OHA	Office of Hearings and Appeals

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Acronyms and Abbreviations

OHTA	Office of Historical Trust Accounting
OIG	Office of the Inspector General
OME	Office of Minerals Evaluation
OMB	Office of Management and Budget
OSM	Office of Surface Mining
OST	Office of the Special Trustee for American Indians
OTFM	Office of Trust Funds Management
OTP	Office of Trust Regulations, Policies and Procedures
OTR	Office of Trust Records
OTRA	Office of Trust Review and Audit
PAR	Performance and Accountability Report
PIV	Personal Identity Verification
PLSS	Public Land Survey System
PMSO	Project Management Support Office
POA&M	Plans of Actions and Milestones
Post-QA	Post Quality Assurance
PPA	Office of Planning and Policy Analysis
PRIS	Production and Response Information System
PRO	Pacific Region office
ProTrac	Probate Case Management and Tracking System
QA	Quality Assurance
QC	Quality Control
RAF	Recommended Action Forms
RAS	Rangeland Administration System
RDRS	Royalty Distribution and Reporting System
REM	Real Estate Module
RFP	Request for Proposal
RM-PLUS	Risk Management Assessment/Evaluation tool
RMRO	Rocky Mountain Region office
ROW	Rights-of-Way
SANS	SysAdmin, Audit, Network, Security
SCADA	Supervisory Control and Data Acquisition
SDA	Special Deposit Accounts
SDLC	System Development Life Cycle
SMEs	Subject Matter Experts
SMS	System Management Servers
SOL	Office of the Solicitor
SPRO	Southern Plains Region office
SSA	Social Security Administration
SSM	System Security Manager
SSP	System Security Plan
ST&E	Security Test and Evaluation
STIGs	Security Technical Implementation Guides
SUS	System Update Servers
SWRO	Southwest Region office

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Acronyms and Abbreviations

TAAMS	Trust Asset and Accounting Management System
TAP	Technical Architecture Profile
TBCC	Trust Beneficiary Call Center
TESC	Trust Executive Steering Committee
TFAS	Trust Fund Accounting System
TPMC	Trust Program Management Center
TRAC	Trust Tracking and Coordination
Treasury	Department of the Treasury
TRM	Technical Reference Model
TRO	Temporary Restraining Order
UAT	User Acceptance Testing
USGS	United States Geological Survey
USPAP	Uniform Standards of Professional Appraisal Practice
VBNS	Very High Performance Backbone Network Service
VPN	Virtual Private Network
WAN	Wide area network
WAU	Whereabouts Unknown
WRO	Western Region office