

EDP AUDITING

BEST PRACTICES IN DUE PROFESSIONAL CARE: AN IT AUDIT PERSPECTIVE

Frederick Gallegos and Anna Carlin

INSIDE

What Is Due Professional Care?; Peer Review; Client Review; Auditor Conduct; Communication; Technical Competence; Timeliness; Judgment; Business Knowledge; Certification; Training; Standards; Independence; Continuous Reassessment; High Ethical Standards; Legal Implications

WHAT IS DUE PROFESSIONAL CARE?

Due professional care can be defined in several ways. Some will tell you that it is the respect you show your auditee and the way in which you conduct yourself during an audit. Others might say it is the professional image expected of an auditor toward the auditee. Still others believe that due professional care denotes the expectancy of adding value to the client by providing solutions instead of problems.

Still others believe that you are the cop and the auditee is your suspect. You make inquiries, investigate, and test your conclusions. At the end, you indicate who is guilty of doing what and the punishment is the recommendations you make to the client. This may be a harsh way to look at it but to the auditee it may be real life. The auditee must answer to upper management; and in some cases, the auditee's job may be affected based on the auditor's report.

No classes exist on the "how-tos" of due professional care but there are several factors that contribute to the formation of due professional care in audit departments and every auditor in it, to include:

- Peer review
- Client review
 - Auditor conduct
 - Communication
 - Technical competence
 - Timeliness

PAYOFF IDEA

The idea of *best practices* is to share ideas between IS audit professionals in their domain. Best practices of IS audit management involve relaying to others ideas that they can use for their companies. Some ideas may help professionals develop much-needed policies, procedures, and practices for their organizations. This article provides an overview of best practices in IS audit management, with a focus on due professional care in the post Sarbanes-Oxley era.

- Judgment
- Business knowledge
- Certification
- Training
- Standards
- Independence
- Continuous reassessment
- High ethical standards

Due professional care came to the forefront of the audit community at the beginning of this decade as a result of the financial scandals of Enron, Global Crossing, and others. Previously, the Equity Funding scandal of 1973 gave rise to the development of strong state and federal regulation of the insurance industry and corporate creative accounting in the aerospace industry provided support for the Foreign Corrupt Practices Act of 1977 more than 25 years earlier. Now, perhaps the Sarbanes-Oxley Act of 2002 will be a vivid reminder of the importance of due professional care. This act is a major reform package mandating the most far-reaching changes Congress has imposed on the business world since the Foreign Corrupt Practices Act of 1977 and the SEC Act of the 1930s. It seeks to thwart future scandals and restore investor confidence by, among other things, creating a public-company-accounting-oversight board, revising auditor independence rules, revising corporate governance standards, and significantly increasing the criminal penalties for violations of securities laws.

PEER REVIEW

The existence of our profession relies heavily on *peer review*. Peer review lets IS auditors know how they are perceived in the IS audit community. Peer reviews are also a good way for auditors to develop good professional relationships with their peers. People within their own department, within their organization, or an external entity can perform these reviews. An external entity could be a public accounting firm reviewing the work of a client's internal audit department. Peer reviews are supported by the U.S. General Accounting Office (GAO), the American Institute of Certified Public Accountants (AICPA), the Institute of Internal Auditors (IIA), and the Information Systems Audit and Control Association (ISACA).

To achieve good quality peer reviews, they should be given on a regular basis to reach the desired goals of management. The reviews should be given to stimulate criticism and praise where needed. During the first couple years, IS auditors will go through a transformation as they acquire skills instrumental to them throughout their career. The IS auditor receiving the review should be continuously reassessed in order to verify the adequacy of the newly acquired skills.

In addition, the peer review indirectly ensures the client that the auditor is quite capable of performing his or her job duties as required under the guidelines of the audit. Areas to examine may be the auditor's technical knowledge, communication, analytical skills, and time management skills. Consequently, the peer

review ensures that the auditor possesses all the needed skills to perform their job duties, as well as ensuring that the client receives a high-quality review.

CLIENT REVIEW

Peer reviews are performed by fellow auditors and are considered to be a solid evaluation of an auditor's performance. However, it may not always encompass the customer or auditee's satisfaction with the work performed. Some audit departments issue *client surveys* at the conclusion of an audit once the report has been finalized. The client survey covers areas such as auditor conduct, communication, technical competence, timeliness, judgment, and business knowledge.

Auditor Conduct

Auditor conduct is important because it sets the tone for the audit. If an auditor has the "gotcha" mentality, then the auditees will not be open to discussing issues or receptive to audit recommendations. As stated previously, the auditor needs to work with the auditee to develop reasonable recommendations that will either eliminate the exposure or minimize the exposure to an acceptable degree. Most internal audit reports today include comments indicating that the recommendations have been discussed with the auditees and whether the recommendations have been implemented. Understand that this is serious business, and internal and external auditor and corporate management must understand their roles and responsibilities in the post Sarbanes-Oxley era.

Communication

Communication encompasses both oral and written. Oral communication skills are key to both auditors and auditees because if auditors cannot explain what they need and why they are looking at it, then the purpose of the audit procedure is lost. If auditees see this, they will typically give the auditor something that may address their request but may not fulfill the purpose. That is why it is so important for those in charge to ensure that every auditor on the team is familiar with the audit objectives and scope prior to beginning an audit step.

Written communication skills are evidenced in the workpapers and management reports. The workpapers detail the steps taken by the auditor in evaluating whether a control exists and functions as it should. The in-charge person reviews the workpapers to ensure that the audit objective has been met, the level of detail required by the department has been met, and that the evidence contained therein is adequate. The workpapers become more important as time lapses between the report draft and the final issuance of the management report. It is not unusual to refer back to workpapers to clear up any questions on management's part. In addition, workpapers could be used as evidence in litigation that may not be called upon for several years.

The management report should detail those findings where corrective action is required. Findings should be explained in an English-like manner so that the

associated exposure is understandable. Especially when technical jargon is introduced, you will lose your target audience, which is senior management. Keep in mind that the management report may be the only exposure your department has to the rest of the organization. If it is difficult to understand, then management individuals may not read it in its entirety and thus miss the importance of the audit work performed and the value being added to the organization.

Most auditors, at a minimum, possess a bachelor's degree where they have written numerous reports explaining a researched topic. In the academic world, the more pages you have, the better your grade. In the business world, management expects everything to be summarized and to the point. Most first-year auditors need to make this adjustment. The auditor, working with a more-experienced person, can achieve this shift. The more-experienced person will point out those areas of the report that are weak or vague. The experienced person would then help the auditor rewrite those report sections to improve management's understanding of the issue. Writing is one of those skills that needs to be practiced or you will lose it.

Some organizations also improve report-writing skills by contracting with business-writing consultants. The difficulty that business-writing consultants experience involves verbs — not whether the present or past tense should be used, but rather whether the active voice instead of the passive voice should be used. Most audit departments agree that past tense should be used in management reports where all fieldwork has been completed. The active voice (for example, must) is used by successful or persuasive business professionals; however, the passive voice (for example, could and should) is mostly widely used by audit professionals. That is why working with experienced auditors is the most beneficial way to hone an auditor's report-writing skills.

Technical Competence

Technical competence is always an area that auditees want auditors to possess more of. Due to the number of platforms, it is not realistic for an IS auditor to be an expert in all of them. When staffing a technical review, most audit departments will assign those individuals with the necessary expertise to those auditors who need to gain the knowledge. In addition, the team should be provided with the needed tools to effectively perform their audit steps. For an auditor's development, you should assign them to audits for coaching by the more-experienced auditors. Development plans for experienced auditors should always include the training of new auditors.

If an audit department does not have the expertise to perform a review, two things can be done. First, an expert can be borrowed from another part of the organization to teach the audit group what is needed for the review. In this way, the audit group retains the experience. Second, you can hire an outsider to perform those audit steps for their area of expertise. If you use an outside expert, you should have your staff learn from them what should be done for the next time that review is scheduled. In this way, you can share in the expert's knowledge.

Timeliness

Closing meetings are held at the end of audit fieldwork. This meeting serves as the final listing of all audit findings and their recommendations. It is at this time that any ambiguities are cleared up and to verify that the recommendations made are reasonable.

The end product of all reviews is the management report. The management report is issued in draft and discussed once more with management. Any findings that have been corrected should be indicated as such in the report. The time between the closing meeting and the final issuance of the report should not be long. If the time lapse is long, the importance of the findings can be lost or become meaningless due to the ever-changing business environment.

Judgment

Judgment is a key factor in ensuring due professional care and perhaps the most difficult of areas to develop. For each audit step performed, the auditor needs to evaluate whether a control exists and that it functions as intended. Experience, business knowledge, and risk exposure play a part in the evaluation. The client's exposure should be quantified to determine what the total impact would be to the business if the control were not working. The auditor's past experience would help provide recommendations to eliminate or minimize the exposure.

Typically, audit judgment is gained through experience and professional development. One of the earliest forms of developing audit judgment was the writing of audit steps to perform during the audit. Development of this guidance was performed by the audit manager or supervisor who had experience in the organization's culture and processes. Historical or prior audit records were also used as a basis for developing the audit steps to be performed by the auditor.

Today, this experience is being captured through automated support systems for the auditor, which allow them to assess past patterns and audit findings. From such audit support systems, records and experiences collected via the audit workpapers can be retrieved and used as guidance for the auditor. Again, auditors must exercise their judgment in accepting recommendations or suggestions from such support systems.

Professional development activities such as involvement in professional associations can help develop an auditor's judgment by listening to the experiences of others. Certainly, the Internet has helped in this area by allowing auditors to share their experiences and audit programs through listservers and Web sites. Professional associations must be commended for their activities to provide the best level of training and experience-sharing events for today's audit professional. For example, best practices sharing can be used by development auditors in certain given situations by understanding the experiences of others — what worked and what did not work.

Business Knowledge

Auditors are fortunate in that they can see how an entire company operates. They see a product being made, orders being taken, product being shipped to the customer, the customer being billed, and the receipt of payment. In addition, auditors are exposed to the management processes in place to ensure a smooth operating environment. Gaining business knowledge can be time-consuming but it is necessary for audit reviews.

Due professional care is not just reporting findings to management, but it is also ensuring them that the issue or issues have been addressed. The only way this can be accomplished is if you are working with the auditee to ensure that it is being addressed before you bring this to management's attention. You are not there to be just a "tattle tale"; you are there to make sure whatever is wrong gets fixed.¹

Effective IS auditors possess a variety of skills that enables them to add value to their organizations and clients. Technical training does not fully prepare IS auditors for the communication and negotiation skills, among others, required for success. These additional skills can be referred to as business knowledge skills. IS auditors must fully understand the business, its goals, objectives, culture, and operational requirements. Exposure to these skills can only come through experience and training.

Understanding the client and his environment should be evident in the auditor's evaluation. Knowledge such as this would aid in identifying the organization's high-risk areas. Once the high-risk areas have been identified, the auditor can then clearly define the objectives and scope of the review. IS auditors must examine, gather, and interpret information from automated and manual systems with the understanding of the business objectives and goals in mind. Many non-technical or supplemental business knowledge skills are concerned with gathering information from and, of comparable importance, presenting information to people. As such, these supplemental skills are readily transferable to other disciplines: for example, finance, management, and marketing.

As control exposures are identified, the auditor must also identify the associated risks and discuss them with management. Such discussion will ensure that the auditor's evaluation of the risk is correct, as well as that the formation of a recommendation will adequately address the exposure and add value to the organization. The final product IS auditors create is the information presented in their audit reports. If this information is not effectively and efficiently delivered with an understanding of the business, via solid oral and written communication skills, all value accruing from the audit process could potentially be lost.

Certification

An IS auditor's goal should be to attain the Certified Information Systems Auditor (CISA) designation. The CISA designation shows dedication to their profession; as well it is as an indicator of the high-quality work one would receive from them. The IS auditor is expected to successfully pass the CISA exam, to have a

minimum of five years of professional IS auditing experience, to subscribe to the Code of Professional Ethics, and to gain continued education.

Training

“Constant education is needed and required by your certification.”² Even those not certified should never stop learning or they could become obsolete. One company has gone so far as to create a separate line item in its budget of \$250,000 for one year’s training.³

Most training encompasses learning about the business, the business environment, technical areas, and communication. Training can be obtained by attending professional association conferences, on-the-job reviews with experts, professional association meetings, and any in-house IS department training, as well as networking with one’s peers.

Most IS audit professionals belong to the Information Systems Audit and Control Association (ISACA). The ISACA holds an annual international conference that draws a large crowd and offers classes on audit, security, and privacy. IS auditors from all over the world attend this conference to become knowledgeable in what newly introduced technology might affect an organization’s security structure. The presenters are considered knowledgeable in the subject matter discussed. These classes also serve as an opportunity to form professional relationships with other IS auditors. IS auditors can gain valuable training through various other professional associations, including the Institute of Internal Auditors, the American Institute of Certified Public Accountants, the Association of Government Accountants, the Association of Information Technology Professionals, etc.

Professional associations usually have monthly meetings at which a guest speaker discusses an audit topic currently facing IS audit professionals. The guest speakers are usually very experienced and knowledgeable individuals, recognized as being experts in their field. These breakfast, lunch, or dinner meetings also provide an excellent opportunity to network with your peers. You will meet IS auditors that are internal or external to an organization, employed by the government or private industry, experienced or inexperienced, technical or a generalist, and are management or staffers. All these individuals have experiences that may be useful to you in the future. Find out what company they work for, what type of audits they perform, what platforms they have audited, what training they have received, and what tools have helped them become more efficient and effective. More often than not, experienced auditors will offer their assistance to you with some best practices.

Standards

Certified or not, IS auditors adhere to the standards and guidelines issued by ISACA. These guidelines serve as the minimum performance level required to meet the profession’s expectations while adhering to the Code of Professional Ethics. In addition to ISACA, there are a number of other professional associa-

tions that have issued both standards and guidance that may directly or indirectly affect the IS audit professional. For example, IS auditors in the U.S. Department of Justice will be required to meet the “Government Auditing Standards” issued by the U.S. General Accounting Office as their primary audit standards criteria. The other professional associations that have issued standards for audit, security, and privacy include:

- American Institute of Certified Public Accountants (AICPA)
- Institute of Internal Auditors (IIA)
- Information Systems Audit Control Association (ISACA)
- Canadian Institute of Chartered Accountants (CICA)
- International Federation of Accountants (IFAC)
- Information System Security Association (ISSA)
- Society for Information Management (SIM)
- Association of Information Technology Professionals (AITP)
- International Federation for Information Processing (IFIP)
- Association for Computing Machinery (ACM)
- The Institute of Chartered Accountants in Australia (ICAA)
- National Institute of Standards and Technology (NIST)
- The International Organization of Supreme Audit Institutions (INTOSAI)
- U.S. General Accounting Office (GAO)

Independence

Audit independence is a very critical component if a business wishes to have an audit function that can add value to the organization. The audit report and opinion must be free of any bias or influence if the integrity of the audit process is to be valued and recognized for its contribution to the organization’s goals and objectives. A number of professional organizations (e.g., AICPA, IIA, ISACA, AGA, and others) have addressed this point in very clear context and language. Governmental organizations such as the U.S. General Accounting Office and the International Organization of Supreme Audit Organizations have also addressed this area in depth.

The Sarbanes-Oxley Act of 2002 remains a vivid reminder of the importance of due professional care. This act prohibits all registered public accounting firms from providing audit clients, contemporaneously with the audit, certain non-audit services, including internal audit outsourcing, financial-information-system design and implementation services, and expert services. These scope-of-service restrictions go beyond existing Securities and Exchange Commission (SEC) independence regulations. All other services, including tax services, are permissible only if preapproved by the issuer’s audit committee, and all such preapprovals must be disclosed in the issuer’s periodic reports to the SEC.

The act requires auditor (not audit firm) rotation. Therefore, the lead audit partner and/or the concurring review partner must rotate off the engagement if he or she has performed audit services for the issuer in each of the five previous

fiscal years. The act provides no distinction regarding the capacity in which the audit or concurring partner provided such audit services. Any services provided as a manager or in some other capacity appear to count toward the five-year period. The provision starts as soon as the firm is registered; so, absent guidance to the contrary, the audit and concurring partner must count back five years starting with the date in which Public Company Accounting Oversight Board registration occurs. This provision has a definite impact on small accounting firms. The SEC is currently considering whether or not to accommodate small firms in this area; currently, there is no small-firm exemption from this provision.

As previously mentioned, this act is a major reform package mandating the most far-reaching changes Congress has imposed on the business world since the Foreign Corrupt Practices Act of 1977 and the SEC Act of the 1930s. It seeks to thwart future scandals and restore investor confidence by, among other things, creating a public-company-accounting-oversight board, revising auditor independence rules, revising corporate governance standards, and significantly increasing the criminal penalties for violations of securities laws.

Continuous Reassessment

The authors believe that this is a very critical component. Continuous reassessment of your audit goals is necessary to stay on track with audits lasting more than two to four weeks. Verify that you, as the auditor, have not lost sight of your original intentions and that the scope of the audit still remains the same. Auditors can easily lose themselves in other areas or go off on tangents because of seemingly unending audits. The client, whomever it may be, is not paying for a jumbled mess of information or any information on areas not previously agreed upon.

For this reason and this reason alone, you, the auditor, need to step back and reassess the situation. You should make sure that the goal of the audit has not changed. If the goal has changed and you find yourself encompassing more information in your audit to support your conclusions, then a reevaluation of the audit scope is necessary. It is possible that the scope of the audit in this case may need to be expanded. A previous Auerbach publication (“Evaluating IS Audit Quality,” 1997) provides guidance on how to accomplish this.

High Ethical Standards

For one to act as an auditor, one must have a high standard of moral ethics. The term “auditor” is Latin for one that hears complaints and makes decisions or acts like a judge. To act as a judge, one definitely must be morally ethical or it defeats the purpose. Ethics are a very important basis for our culture as a whole. If the auditor loses favor in this area, it is almost impossible to regain the trust he or she once had with audit management and auditees.

Trust is the mainstay thrust upon all auditors as they enter into the position. Whether or not an auditor is ethical in the beginning, they all start off with the same amount of trust and good favor from the client or auditee. If the bond is not

broken, the auditor establishes a good name as someone who can be trusted with sensitive material.

In today's world economy, trust is an unheard-of word. No one can trust anyone these days; and for this reason it is imperative that high ethics are at the top of the managers' lists of topics to cover with new staff. Times are changing and so are the clients requesting auditor services. Most managers will tell you that they cherish that thing called "ethics" because it distinguishes them from the other guy.

For example, your budget calls for numerous hours; it is unethical to put down hours you have not worked. It is also unethical to overlook something during the audit because the client tells you that it is not important.

One has to be objective, one has to be fair, and one has to be ethical. If I have to stress one thing above all with respect to due professional care, it's ethics. Sometimes, our wants and desires to succeed and produce the best profit margin for our company get in the way of our ethical standing. I think at times we use gray areas with ethics. It's black, it's white, it's right or it's wrong. So, if there is one message I can give, it's have a high standard of ethics.⁴

A fine line exists between what is ethical and what is legal. Something can be ethically wrong but still legal. However, with that being said, some things initially thought to be unethical become illegal over time. If there is a large enough group that is ethically opposed to something, you will see legislation introduced to make it illegal.

When IS auditors attain their CISA certification, they also subscribe to a Code of Professional Ethics. This code applies to not only the professional conduct but also the personal conduct of IS auditors. It requires that the ISACA standards are adhered to, confidentiality is maintained, that any illegal or improper activities are reported, that the auditor's competency is maintained, that due care is used in the course of the audit, that the results of audit work are communicated, and that high standards of conduct and character are maintained.⁵

LEGAL IMPLICATIONS

In the pre-Sarbanes–Oxley years, the establishment of a "limited liability partnership" came as a result of a Big 5 organization that was taken to court by a client. The client, who selected a support system based on the firm's recommendation, failed to perform in the manner recommended and caused the company financial loss. The courts held the Big 5 firm liable for not exercising "due professional care" in the conduct of the work it performed.

Today, we now have a Big 4 due to the Enron scandal and the demise of Arthur Andersen LLP. The guidance the courts used to evaluate the issues of this case was the guidance issued by the American Institute of Certified Public Accountants. Because the firm held itself and its professionals compliant with the AICPA's governing standards and guidance, the courts used this guidance as a basis for evaluating the evidence of the case and their professional conduct. Arthur Andersen LLP was the first major international accounting firm taken to court and successfully convicted for a lack of due professional care in the destruc-

tion of client documents and obstructing justice. On June 16, 2002, a jury found Arthur Andersen LLP guilty of obstructing justice, all but sealing the fate of this accounting firm.

After a month and a half trial and ten days of deliberations, jurors convicted Andersen of obstructing justice when it destroyed Enron Corp. documents while on notice of a federal investigation. Andersen and its lawyers had claimed that the documents were destroyed as part of its housekeeping duties and not as a ruse to keep Enron documents away from the regulators.

CONCLUSION

Due professional care is a necessary component of the audit process. A number of best practices successfully used by audit management, supervisors, and staff to instill due professional care have been discussed. Ultimately, due professional care serves as a foundation to ensure that the client receives a high-quality review. Audit departments should hire people who care about what they do. By the nature of their caring, they put in the quality they do.⁶ By law, in the post Sarbanes–Oxley Act era, their practice of due professional care is critical in establishing public confidence in business.

This article has shared how ethics, certification, communication, technical competence, judgment, business knowledge, training, independence, continuous improvement, peer review, and standards ensure due professional care. Experiences with these components have been provided as a way of showing how others have used them successfully.

Frederick Gallegos, CISA, CGFM, CDE, is an adjunct professor and MSBA-Information Systems Audit Advisor for the Computer Information Systems Department, College of Business Administration, California State Polytechnic University, Pomona, California. He has more than 30 years of experience in the information systems audit, control, and security field. He has taught undergraduate and graduate courses in the IS audit, security, and control field and has published widely. He has been active in the Information System Audit and Control Foundation.

Anna Carlin is a lecturer in the Computer Information Systems Department, College of Business Administration, California State Polytechnic University, Pomona, California. She has more than 16 years of business experience, with eight years in the information systems audit, control, and security field. She has taught undergraduate and graduate courses in management information systems and the IS audit, security, and control field.

Notes

1. Interview with Carol Hyzer, ISACA International Conference, Universal Sheraton Hotel, 1995. *Best Practices of IS Audit Management*, ISACA International Conference, Universal Sheraton Hotel, 1995.
2. Interview with Carl Pabst, ISACA International Conference, Universal Sheraton Hotel, 1995. *Best Practices of IS Audit Management*, ISACA International Conference, Universal Sheraton Hotel, 1995.
3. Interview with Tom Truglio, ISACA International Conference, Universal Sheraton Hotel, 1995. *Best Practices of IS Audit Management*, ISACA International Conference, Universal Sheraton Hotel, 1995.
4. Truglio, Tom, *Best Practices of IS Audit Management*, ISACA International Conference, Universal Sheraton Hotel, 1995.

-
5. ISACA, "The Code of Professional Ethics," Information Systems Audit Control Association Web site.
 6. Interview with Steven Hudoba, ISACA International Conference, Universal Sheraton Hotel, 1995. *Best Practices of IS Audit Management*, ISACA International Conference, Universal Sheraton Hotel, 1995.

Bibliography

- Gallegos, Frederick and Manson, Daniel P. "Evaluating the Quality of an IS Audit," Auerbach Publishers/CRC Press, Boca Raton, FL, 1997.
- Gallegos, Frederick, Manson, Daniel P., and Allen-Senft, Sandra. "Information Technology Control and Audit," Auerbach Publishers/CRC Press, Boca Raton, FL, 1999.
- Goldblatt, Joe Jeff. *Special Events: Best Practices in Modern Event Management*. Van Nostrand Reinhold, New York, 1997.
- ISACA—Los Angeles Chapter and Orange County Chapter, "Best Practices in IS Audit Management," video tape production by Masters of Science in Business Administration—Information Systems Auditing, California State Polytechnic University, Pomona, CA, 1997, under research grant.
- www.isaca.org, The Information Systems Audit and Control Association.
- www.theiia.org, The Institute of Internal Auditors.
- www.aicpa.org, the American Institute of Certified Public Accountants.
- Roth, James. *Control Model Implementation: Best Practices*. Institute of Internal Auditors Research Foundation, Altamonte Springs, FL, 1997.
- Toney, Frank. *Best Practices of Project Management Groups in Large Functional Organizations*. Project Management Institute, Upper Darby, PA, 1997.
- U.S. Congress House Committee on Government Reform and Oversight; Subcommittee on Government Management, Information and Technology. *Using the Best Practices of Information Technology in Government*. Project Management Institute, Upper Darby, PA, 1997.
- U.S. Senate Committee on Health, Education, Labor & Pensions, chaired by Senator Edward M. Kennedy (D-MA). *Senate Hearing on Enron and Pension Reform February 7, 2002*.
- U.S. Congress House Financial Services Committee, February 4, 2002.
- U.S. House Energy & Commerce Committee, Chairman Billy Tauzin (R-La.), February 5, 2002.
- U.S. Senate Commerce Committee, February 5, 2002.