UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable Theodore R. Essex
Administrative Law Judge

In the Matter of: **CERTAIN ELECTRONIC IMAGING DEVICES**	**Investigation No. 337-TA-850**

DECLARATION OF THE RFC PUBLISHER FOR THE INTERNET ENGINEERING TASK FORCE, AN ORGANIZED ACTIVITY OF THE INTERNET SOCIETY

I, Sandy Ginoza, of lawful age, based on my personal knowledge and information, hereby declare:

1. I am an employee of Association Management Solutions, LLC ("AMS"), which acts under contract to the Internet Society ("ISOC") as the operator of the RFC Publisher. The RFC Publisher is part of the "RFC Editor" function, which provides online access to the authoritative Request for Comments ("RFC") series of documents ("RFC Series"), and provides storage and preservation of records relating to these documents. The RFC Series includes, among other things, the series of Internet standards developed by the Internet Engineering Task Force ("IETF"), an organized activity of ISOC. I hold the position of Director of the RFC Publisher. I began employment with AMS in this capacity on 5 January 2010.

2. Among my responsibilities as Director of the RFC Publisher, I act as the custodian of records relating to the RFC Series.

3. From June 1999 to 4 January 2010, I was an employee of the Information Sciences Institute at the University of Southern California ("ISI"). I held various position titles with the RFC Editor project at ISI, ending with Senior Editor.

4.   The RFC Editor function was conducted by ISI under contract to the United States government prior to 1998. In 1998, ISOC, in furtherance of its IETF activity, entered into the first in a series of contracts with ISI providing for ISI's performance of the RFC Editor function. Beginning in 2010, certain aspects of the RFC Editor function were assumed by the RFC Publisher operation of AMS under contract to ISOC (acting through its IETF function and, in particular, the IETF Administrative Oversight Committee). The business records of the RFC Editor function as it was conducted by ISI are currently housed on the computer systems of AMS, as a contractor to ISOC.

5.   I make this Declaration based on my personal knowledge and information contained in the business records of the RFC editor as they are currently housed at AMS, or confirmation with other responsible RFC Editor personnel with such knowledge. If called as a witness in this Investigation, I could and would testify to the facts as stated in this Declaration.

6.   I am familiar with the following documents listed on the RFC Editor's web site, www.rfc-editor.org:

- "MIME (Multipurpose Internet Mail Extensions): Mechanisms for Specifying and Describing the Format of Internet Message Bodies, Networking Work Group, Request for Comments: 1341 (June 1992)," authored by N. Borenstein & N. Freed, which may be downloaded from the following address: http://www.rfc-editor.org/rfc/rfc1341.txt ("RFC 1341").

- "Hypertext Markup Language - 2.0, Network Working Group, Request for Comments: 1866 (November 1995)," authored by T. Berners-Lee and D. Connolly, which may be downloaded from the following address: http://www.rfc-editor.org/rfc/rfc1866.txt ("RFC 1866").

- "The MIME Multipart/Related Content-type, Network Working Group, Request for Comments: 2387 (August 1998)," authored by E. Levinson, which may be downloaded from the following address: http://www.rfc-editor.org/rfc/rfc2387.txt ("RFC 2387").

- "Internet Message Format, Network Working Group, Request for Comments: 2822 (April 2001)," authored by P. Resnick, which may be downloaded from the following address: http://www.rfc-editor.org/rfc/rfc2822.txt ("RFC 2822").

7. The documents produced by the IETF in response to the Subpoena are sequentially numbered as 337-TA-850-IETF00001 to 337-TA-850-IETF00201, inclusive. The produced documents include a true and correct copy of RFC 1341, bearing document numbers ranging from 337-TA-850-IETF00001 to 337-TA-850-IETF00081 ("produced RFC 1341"); a true and correct copy of RFC 1866, bearing document numbers ranging from 337-TA-850-IETF00082 to 337-TA-850-IETF00148 ("produced RFC 1866"); a true and correct copy of RFC 2387, bearing document numbers ranging from 337-TA-850-IETF00149 to 337-TA-850-IETF00157 ("produced RFC 2387"); and a true and correct copy of RFC 2822, bearing document numbers ranging from 337-TA-850-IETF00158 to 337-TA-850-IETF00201 ("produced RFC 2822").

8. I hereby certify that the produced RFC 1341 constitutes a record of regularly conducted business activity which was (A) made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; (B) kept in the course of the regularly conducted activity; and (C) made by the regularly conducted activity as a regular practice.

9.   Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of RFC 1341 in the ordinary course of its regularly conducted activities. RFC 1341 has been publicly available through the RFC Editor's web site or through other means since its publication in 1992.

10.   I hereby certify that the produced RFC 1866 constitutes a record of regularly conducted business activity which was (A) made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; (B) kept in the course of the regularly conducted activity; and (C) made by the regularly conducted activity as a regular practice.

11.   Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of RFC 1866 in the ordinary course of its regularly conducted activities. RFC 1866 has been publicly available through the RFC Editor's web site or through other means since its publication in 1995.

12.   I hereby certify that the produced RFC 2387 constitutes a record of regularly conducted business activity which was (A) made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; (B) kept in the course of the regularly conducted activity; and (C) made by the regularly conducted activity as a regular practice.
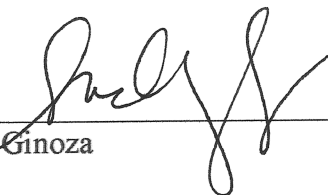
13.   Based on a search of RFC Editor records, I have determined that the RFC Editor maintained a copy of RFC 2387 in the ordinary course of its regularly conducted activities. RFC 2387 has been publicly available through the RFC Editor's web site or through other means since its publication in August, 1998.

14.   I hereby certify that the produced RFC 2822 constitutes a record of regularly

conducted business activity which was (A) made at or near the time of the occurrence of the

matters set forth by, or from information transmitted by, a person with knowledge of those

matters; (B) kept in the course of the regularly conducted activity; and (C) made by the regularly

conducted activity as a regular practice.

15.   Based on a search of RFC Editor records, I have determined that the RFC Editor

maintained a copy of RFC 2822 in the ordinary course of its regularly conducted activities. RFC

2822 has been publicly available through the RFC Editor's web site or through other means since

its publication in April, 2001.

        I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct.

        Date: 16 January 2013

        By:_____
        Sandy Ginoza