

Instructions for Submitting Draft Registration Statements for Confidential/Non-public Review

Until we are able to receive Emerging Growth Company confidential draft registration statements or foreign private issuer non-public draft registration statements on EDGAR, you must submit those documents to us following the instructions for the secure e-mail system presented below. Submitted draft registration statements must be in a text searchable PDF format.

We also will use this system to send comment letters to you and you must use this system to submit your correspondence regarding your draft submission to us. The e-mail address you use to register on the secure e-mail system will be the only e-mail address that we will use to send you comment letters and any other correspondence prior to the public filing of your draft registration statement.

To submit a draft registration statement, you must have a secure e-mail account with this system. If you have not previously created an account, you must [create an account](#) by providing an e-mail address, password, and password reminder phrase.



The screenshot shows a registration form for a secure mailbox. At the top left is the SEC logo, and at the top right is the text "U.S. Securities and Exchange Commission". The main heading reads "Register below for your mailbox to send and receive secure messages." Below this are four input fields: "Email Address:", "Password:", "Re-enter Password:", and "Password Reminder Phrase:". The "Password Reminder Phrase:" field has a sub-instruction: "Choose a word or phrase that will help you remember your password." To the right of these fields is a "Password Rules" box with the following text: "Passwords must be at least 6 characters in length, and meet 2 of the following conditions:" followed by a bulleted list: "Contain both alphabetic and numeric characters", "Contain both uppercase and lowercase characters", and "Contain at least one special character, such as: ~!@#\$\$%^&". At the bottom of the form are two buttons: "Cancel" and "Submit Password". Below the buttons is a link: "For Customer Support, email us at support@zixcorp.com."

Secured by **zixCORP**

If you have previously created an account, you may [sign in](#) using your e-mail address and password.

The screenshot shows the login page for the U.S. Securities and Exchange Commission's Secure Email Portal. At the top left is the SEC logo, and at the top right is the text "U.S. Securities and Exchange Commission". The main heading reads "Welcome to the U.S. Securities and Exchange Commission's Secure Email Portal". Below this, there are two input fields: "Email Address:" and "Password:". The password field has a "Forgot your password?" link next to it. A "Sign In" button is positioned below the password field. To the right of the login fields is a box titled "U.S. Securities and Exchange Commission Secure Email Registration" with the text "For first time users, [click here](#) to create your account." Below the login fields are links for "Change your password" and "Use online help". At the bottom of the page, it says "For Customer Support, email us at support@zixcorp.com". The page is secured by zixcorp.

After you sign in, your secure mailbox will appear.

The screenshot shows the mailbox interface after logging in. At the top left is the SEC logo, and at the top right is the text "U.S. Securities and Exchange Commission". Below the header is a navigation bar with buttons for "Inbox", "Address", "Compose", "Sent Mail", "Drafts", "Help", and "Sign Out". To the right of the navigation bar, it says "Signed in as!". Below the navigation bar are "Refresh" and "Delete" buttons. A message status bar indicates "You have no new messages." Below this is a table with columns for "Select", "From", "Subject", and "Date". The table contains one row with the text "No messages". The page is secured by zixcorp.

To submit a transmittal letter and draft registration statement, select the “Compose” tab and perform the following steps:

- In the “To” field, type

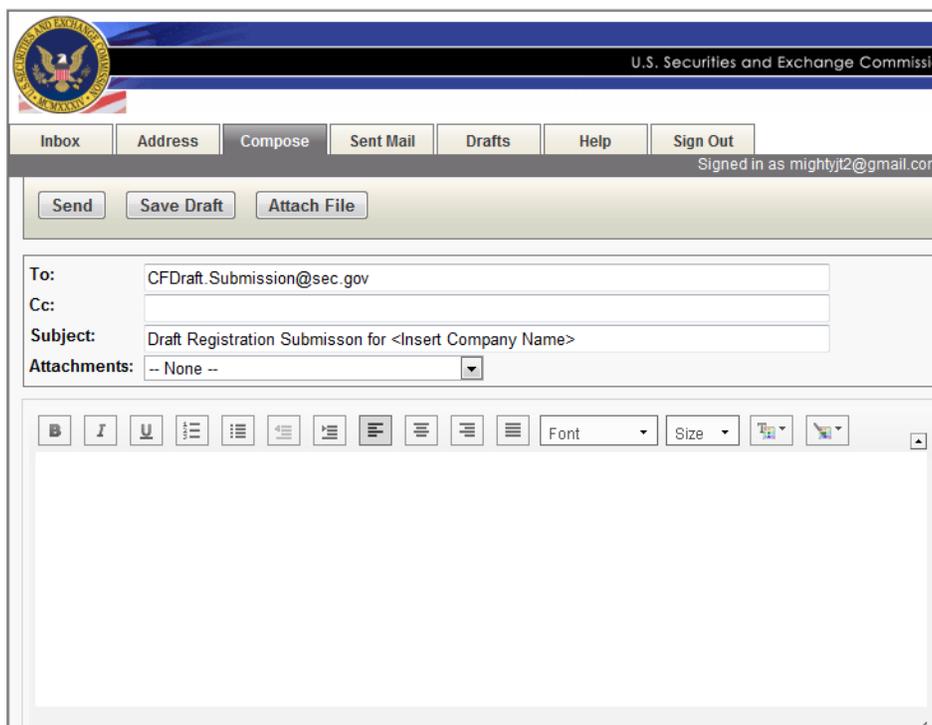
CFDraft.Submission@sec.gov

- In the “Subject” field, type

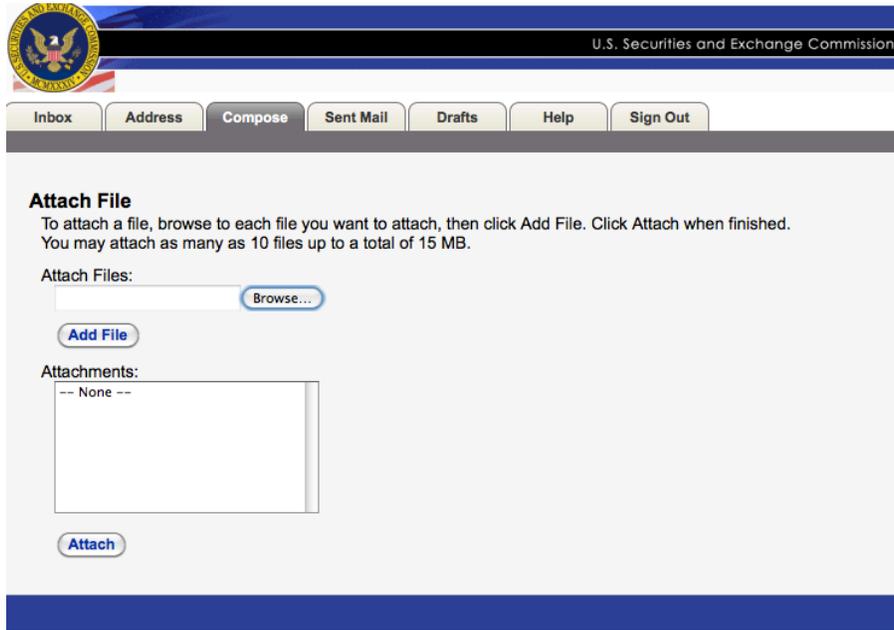
Draft Registration Submission for <Insert Company Name>

If there is any information about you or your submission that you would like to share with us, please include it in your transmittal letter and not the text box of the secure e-mail.

In attaching text searchable PDF files, please include one file for the transmittal letter, another for the body of the draft registration statement, and one for each exhibit to the accompanying draft registration statement. Please use simple names for these files such as LETTER.pdf for the transmittal letter and DRAFTRS.pdf for the draft registration statement. When naming the file for an individual exhibit, please use the exhibit number you used for that document in the exhibit index in your draft registration statement. For example, name the PDF file for the document listed as exhibit 10.1 in your draft registration statement EXHIBIT10.1.pdf. Attach these documents by clicking on the Attach File button.

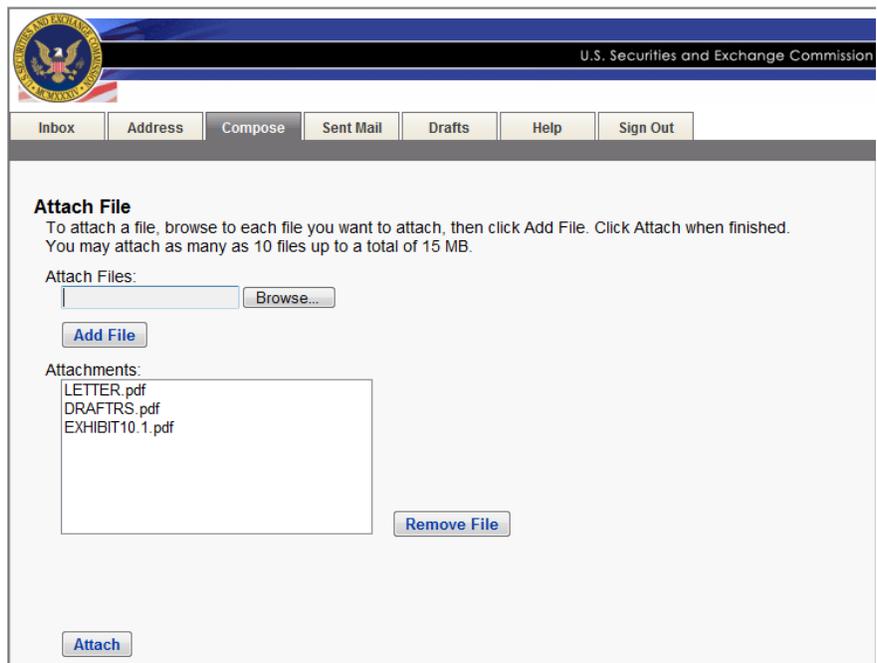


The following screen will appear.

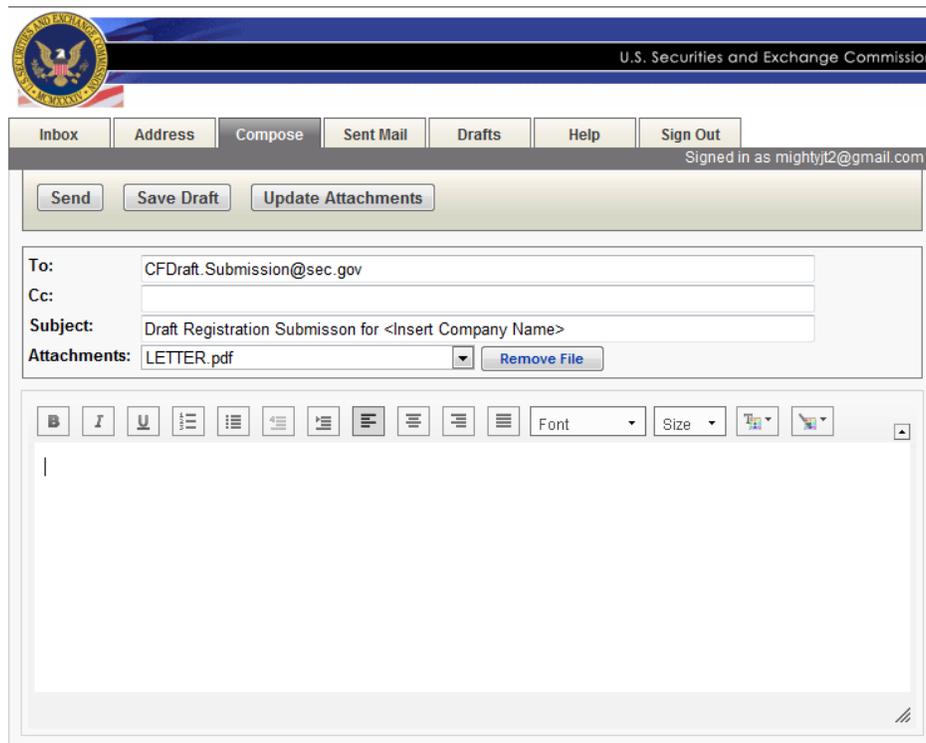


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Either enter the location and name of the files you want to send to us or select the Browse button to locate your files. Select the file to attach and click the Add File button. Repeat this process for each file. Then select the Attach button.



Now you will see your secure e-mail. Please review it for errors. If you are satisfied that the secure e-mail is complete and accurate, click on the Send button to send the secure e-mail to us.



We will send you a return receipt through your secure e-mail box once we receive your draft submission.

We will send you comment letters and other correspondence regarding your submission through your secure e-mail box. The system will notify you at the e-mail address you use to login to the secure e-mail system when you have mail from us waiting in the secure e-mail system.

Please use this same process when submitting amendments to your draft registration statement and any related correspondence.