April 3, 2006

Chairman Christopher Cox  
Securities and Exchange Commission  
100 F. Street NE  
Washington, D.C. 20549

Dear Chairman Cox,

It has come to my attention that on December 1, 2005, members of the Information Assurance Consortium provided a briefing to the Securities and Exchange Commission's Division of Investment Management, on the American National Standard X9.95-2005 Trusted Time Stamp Management and Security. The X9.95-2005 Trusted Time Stamp is a mathematical tamper seal for electronic records that uses time as an immutable reference.

The tamper seal’s reliability is based on a complex mathematical method involving cryptography. Records with a Trusted Time Stamp can later be verified by anyone who matches the mathematical elements in the tamper seal against the reliable and readily-available reference.

As you are undoubtedly aware, there is a growing problem of securing and validating electronic records, especially in Mutual Fund late trading and market timing. The X9.95-2005 solves this problem by electronically time stamping digital documents, confirming the time and existence of that document, while also providing an evidentiary trail of authenticity for that document. The key to determining data integrity hinges upon the ability to prove time.

If time is a factor of control in mutual fund order entry and processing, our National Time Authority is an essential reference. The X9.95-2005 was developed in cooperation with the National Institute of Standards and Technology (NIST), with the help of Dr. Judah Levine, who runs the Time Synchronization Lab for NIST, our civilian National Time Authority.

As Chairman of the Science Subcommittee on Environment, Technology and Standards, I ask you and the SEC to give strong consideration to the issued technical standards published by the American National Standards Institute and developed in cooperation with the National Institute of Standards and Technology.
Chairman Christopher Cox
April 3, 2006
Page 2

Thank you for your consideration of this request.

Sincerely,

Vernon J. Ehlers
Member of Congress

VJE: bg