

600 Vine Street
Suite 1400
Cincinnati, OH 45202
Tel: 513 419 8693
Fax: 513 684 1698

February 4, 2011

VIA OVERNIGHT MAIL – WITH TRACKING

Mr. Michael A. Delaney
Attorney General
33 Capitol Street
Concord, NH 03301

RE: First Transit Security Breach Notification

Dear Mr. Delaney:

First Transit, Inc. provides mass transit and transit management services throughout the United States. In order to provide a safe environment for customers, First requires its applicants to undergo a criminal background check, motor vehicle check, and drug and alcohol test as a condition of employment. As part of that process, applicants provide First with certain personal information that is maintained throughout their employment, including names, addresses and social security numbers.

As required by N.H. Rev. Stat. §359-C:19-21, this letter is to inform the Attorney General's Office that a First employee lost an unencrypted data stick on a city bus in Cincinnati, Ohio on January 21, 2011. The information on the data stick included the following information: name, address, birth date, social security number, information about criminal convictions (if applicable), and information about whether the person passed or failed the drug test (if applicable). Of the affected people, 1 was from New Hampshire.

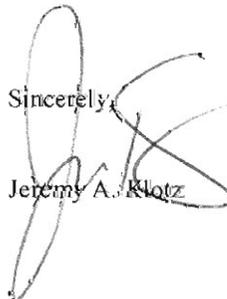
Upon discovery that the data had been lost, First took prompt steps to address the loss. First reported the loss to the police, and filed a report with the city's transit authority. In addition, First retrained its employees on the requirement that all sensitive data be stored on encrypted media when taken out of the office and that authorization from supervisors is mandatory if data is to be taken out of the office.

To date, the data stick has not been recovered. First has no evidence to suggest that the data stick was stolen, nor that the data was even viewed by an unintended third-party. Out of an abundance of caution, First is offering one year of credit monitoring to the individuals notified at no charge.

Early next week, First is sending a letter to the affected employees to notify them of the incident. Attached please find a sample of that notice letter. If you have any questions, please do not hesitate to contact me at _____ or by email at _____

Sincerely,

Jeremy A. Klotz



Cc:

Bruce Rasch
Brad Jokovich
Russ Iddings

February 4, 2011

«First_Name» «Middle_Name» «Last_Name»
«Address_1»
«Address_2»
«City», «ST» «Zip»

600 Vine Street
Suite 1400
Cincinnati, OH 45202
Tel: 513 419 8693
Fax: 513 684 1698

Dear «First_Name»:

Important Notice

We are contacting you because we have learned of a data security incident that involved some of your personal information submitted to us when you applied for employment with FirstGroup America, Inc. or its subsidiary, First Transit, Inc.

On January 20, 2011, an unencrypted USB flash drive containing some of your personal identifiable information was lost. This information included your name, address, social security number, date of birth, criminal record history, the disposition of the criminal charge, employment decision and current status, among other information. Law enforcement has been consulted and a number of internal practices are being enhanced to protect against any further breaches. There is no reason to believe the information is being misused. Nevertheless, we encourage you to remain vigilant by reviewing your account statements and monitoring free credit reports in order to protect yourself against fraud and identity theft.

Complimentary TransUnion Credit Monitoring Service

In an effort to reduce any potential harm, we have arranged for you to enroll, at no cost to you, in an online TransUnion credit monitoring service (TrueCredit[®]) for one year provided by TransUnion, one of the three nationwide credit reporting companies. To enroll in this free service, go to the TrueCredit by TransUnion certificate code website at www.truecredit.com/code and in the space referenced as “*Simply enter your gift certificate code below*” enter _____ and follow the simple steps to receive your service online within minutes. You can sign up for this service anytime between now and **April 30, 2011** using the gift certificate code listed above.

If you do not have access to the Internet, you may as an alternative, enroll in a similar offline, paper based, TransUnion credit monitoring service, via U.S. Mail delivery, by completing the attached Credit Monitoring Authorization Form and mailing or faxing it back to TransUnion by **April 30, 2011**. Unfortunately, due to privacy laws, we cannot register you directly.

Once you are enrolled, you will be able to obtain one year of unlimited access to your TransUnion credit report and credit score. The daily TransUnion credit monitoring service will notify you if there are any critical changes to your TransUnion credit file, including fraudulent activity, new inquiries, new accounts, new public records, late payments, change of address and more. The service also includes up to \$25,000 in identity theft protection with \$0 deductible. (Certain limitations and exclusions may apply.)

Other Safeguards:**Fraud Alert Information**

Whether or not you enroll in credit monitoring, we recommend that you place an initial 90-day “Fraud Alert” on your credit file. Fraud Alert messages notify potential credit grantors to verify your identification before extending credit in your name in case someone is using your information without your consent. Call only one of the following three nationwide credit reporting companies to place your Fraud Alert: TransUnion, Equifax, or Experian. As soon as the credit reporting company confirms your Fraud Alert, they will also forward your alert request to the other two nationwide credit reporting companies so you do not need to contact each of them separately. The contact information for the three nationwide credit reporting companies is:

Equifax
PO Box 740241
Atlanta, GA 30374-0241
www.equifax.com
1-800-525-6285

TransUnion
PO Box 6790
Fullerton, CA 92834-6790
www.transunion.com
1-800-680-7289

Experian
PO Box 9554
Allen, TX 75013
www.experian.com
1-888-397-3742

Free Credit Report Information

Under federal law, you are also entitled to one free credit report once every 12 months from each of the above three major nationwide credit reporting companies. Call 1-877-322-8228 or make a request online at www.annualcreditreport.com.

Even if you do not find any suspicious activity on your initial credit reports, the Federal Trade Commission (FTC) recommends that you check your credit reports periodically. Victim information sometimes is held for use or shared among a group of thieves at different times. Checking your credit reports periodically can help you spot problems and address them quickly.

If you find suspicious activity on your credit reports or have reason to believe your information is being misused, call your local law enforcement agency and file a police report. Get a copy of the report; many creditors want the information it contains to absolve you of the fraudulent debts. You also should file a complaint with the Federal Trade Commission (FTC) at www.ftc.gov/idtheft or at 1-877-ID-THEFT (1-877-438-4338). The FTC's mailing address is: 600 Pennsylvania Avenue, NW, Washington, DC 20580. Your complaint will be added to the FTC's Identity Theft Data Clearinghouse, where it will be accessible to law enforcers for their investigations. Also visit the FTC's Web site at www.ftc.gov/idtheft to review the comprehensive information available in the "*Take Charge: Fighting Back Against Identity Theft*" guide. You may also call 1-877-438-4338 to request a free copy.

Security Freeze Information

You can request a "Security Freeze" on your consumer credit report by sending a request in writing, by mail, to each of the three nationwide credit reporting agencies. When a Security Freeze is added to your credit report, all third parties, such as credit lenders or other companies, whose use is not exempt under law will not be able to access your credit report without your consent. The Security Freeze may delay, interfere with or prohibit the timely approval of any subsequent request or application you make that involves access to your credit report. This may include, but is not limited to, new loans, credit, mortgages, insurance, rental housing, employment, investments, licenses, cellular phone service, utility service, digital signature service, Internet credit card transactions and extension of credit at point of sale. There may be a fee for placing, temporarily lifting, or removing a Security Freeze with each of the nationwide consumer reporting agencies, although that fee is waived if you send the credit reporting agency proof of eligibility by mailing a copy of a valid identity theft report, or other valid report from a law enforcement agency to show you are a victim of identity theft and are eligible for free Security Freeze services.

To place a freeze, write to all three addresses below and include the following information:

TransUnion Security Freeze

P.O. Box 6790
Fullerton, CA 92834
1-888-909-8872
<http://www.transunion.com/securityfreeze>

Equifax Security Freeze

P.O. Box 105788
Atlanta, GA 30348
<https://www.freeze.equifax.com>

Experian Security Freeze

P.O. Box 9554
Allen, TX 75013
<http://experian.com/freeze>

- Full name, with middle initial and generation, such as JR, SR, II, III, etc.;
- Social Security number;
- Date of birth (month, day and year);
- Proof of current address, such as a current utility bill, bank or insurance statement or telephone bill;
- If you have moved in the past 5 years, give your previous addresses where you have lived for the past 5 years;
- A copy of a government issued identification card (state driver's license or ID card, military identification, etc.); and
- Include applicable fee (visit each of the credit reporting company Web sites, listed above, for information on fees for Security Freeze services) Forms of payment are check, money order, or credit card (American Express, Discover, MasterCard and Visa), or a copy of a valid identity theft report, or other valid report from a law enforcement agency to show you are a victim of identity theft and are eligible for free Security Freeze services.

Within 5 business days of receiving your request for a security freeze, the consumer credit reporting agency will provide you with a personal identification number (PIN) or password to use if you choose to remove the freeze on your consumer credit report or to authorize the release of your consumer credit report to a specific party or for a specified period of time after the freeze is in place.

We apologize for any inconvenience this may cause and want to assure you that safeguarding your privacy is a top priority. Please feel free to call us at 855.381.5544 with questions.

Sincerely,



Brad Jokovich
Vice President, Human Resources