ELECTRONIC DOCUMENT INFORMATION SYSTEM (EDIS) 3

USER GUIDE
SUBMITTING ELECTRONIC MEDIA

December 2010

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INTRODUCTION

The United States International Trade Commission (USITC) Electronic Document Information System (EDIS) is a web-based tool for users to submit legal documents to the USITC and search documents submitted. EDIS electronic submission (e-filing) is available to external users for Public documents. Some submissions, specifically Complaints and Post-trial Exhibits, are quite voluminous and therefore are difficult to submit via e-filing because of file size, network speeds and the quantity of documents. Business Proprietary Information is restricted from e-filing currently. Therefore, to improve service and usability, USITC facilitates submission of large documents via CD / DVD media. Each document submitted on electronic media must conform to the same formatting rules as those submitted by e-filing.

The purpose of this guide is to provide technical detail and tips on creating documents that can be successfully processed into EDIS. These tips are applicable to both e-filing and electronic media submissions. EDIS has a CD Verification Tool in the Dockets Office to aid in pre-acceptance verification on the files prepared for EDIS. This guide is not intended to state rules or policy for submission, and does not override guidance found in the Handbook for Electronic Filing or other filing instructions from the Commission or Administrative Law Judges.

AUTHORIZATION TO FILE BY CD

The submitter should contact the Dockets Office at 202-205-1802 to check if the type of document to be filed can be accepted on CD, and determine the number of paper copies and CD copies to provide. Certain documents have requirements to be submitted in paper. Small public documents may be submitted by electronic filing (e-filing) within EDIS. For electronic media submissions, CDs and DVDs are the only accepted media. Devices that would require drivers to attach to a USITC workstation to be read will not be permitted. Submitted media will be retained by the USITC and only available for return to the submitter if an error was found prohibiting acceptance into EDIS. Some filings may require a single paper original where the remaining copies for distribution are provided on CD.

GENERAL GUIDANCE

This section identifies the criteria to be followed to submit documents on CD to EDIS. The ERROR MESSAGE column identifies the Error Message that will be shown on the CD Verification Report. The HOW TO column links to the subsequent paragraphs with step-by-step procedures for fixing the issues found.

TOPIC	ERROR MESSAGE	HOW TO
1. All files must be PDF files. Each file must be in a	The attachment is	See ***CREATE A***

valid PDF format and have a .pdf extension. The minimum acceptable version of each PDF is PDF 1.3 (Acrobat 4.0). The recommended version is PDF 1.6 (Acrobat 7.0). Do not include .jpg, .xls, zip or any other format files. If the material cannot be submitted as a PDF (videos or other animation), then it should be filed separately as a Physical Exhibit.	not a valid Acrobat PDF file. Document version is wrong, the version should be at least 1.3	*PDF FROM SOURCE DOCUMENT*
2. All files on a CD must be for a single filing in EDIS. All pdfs on a CD will be imported into a single document id. Do not include files on the CD that are not intended to be submitted.		
3. All files must be in the root folder of the CD, no sub-folders are permitted. Note: files in sub-folders are not reviewed by the CD Verification tool, therefore these files may reveal additional verification failures upon correction of the folders issue.	Must not contain directories.	
4. Follow the naming conventions for the document type being submitted. File names should be meaningful. Since a standard alphanumeric sort is used to upload files into EDIS, organize and number the files to optimize the desired reading order where possible. This will reduce the effort required by the Case Manager to reorganize the contents once the document is in EDIS. Restrict use of special characters and very long file names.		
5. Each PDF cannot exceed 25 MB. If the file is larger than 25 MB, it must be broken into individual parts which are less than 25MB each.	Exceeds the maximum limit of 25MB.	See *SPLIT LARGE DOCUMENTS*
6. It is desirable to run Optical Character Recognition (OCR) on the PDF prior to submission of the electronic media. EDIS will also OCR the document and extract the OCR text for the EDIS keyword search capability.		See *OCR A DOCUMENT*.
7. The PDF must be free of viruses. The CD must be free of viruses. Please use a commercial virus scan utility to scan the document before submitting it.	Virus detected.	Check user manual for your antivirus product
8. The PDF cannot contain hyperlinks, email links or cross references. Hyperlinks that may cause issues include Table of Content and Index page links, Footnote links to Footnote references, as well as hyperlink or email links to corporate websites or email accounts. Including the URL for a web page or a person's email address is acceptable, but having an active hyperlink on it is an issue.	Annotation failure: Link	See *REMOVE LINKS*, *OPTIMIZE A PDF*, and/or *PRINT TO PDF*
9. The PDF cannot contain any annotations, notes, stickies, highlights, digital signatures, sounds, video, comments, stamps, popups, approvals or the like. These objects are usually additions above the main document on a document layer. Some print options do not print this text. Therefore if intended to be part of the submission, the text	Annotation failure: Stamp Annotation failure: Popup Annotation failure: Widget	See *PRINT TO PDF*, *FLATTEN LAYERS*

must be included in the main document and not on layers. In general, any edits that are on layers attached to the document must be removed or flattened into the main document before submission. Try to use image objects or text touchups if text has to be added after creation of the PDF. Text edits are generally best made in the source document (Word or WordPerfect), then output to a PDF. Be sure to verify the document content after flattening. Acrobat 8 dissolves signatures on flatten, so they may not be readable).

10. The PDF may not contain any scripts, macros, Javascript Actions or form actions as these may contains viruses, worms or Trojan horses.	Javascript was detected in PDF.	See *OPTIMIZE A PDF*, and/or *PRINT TO PDF*
11. Do not attach the source document to the PDF. This text will be OCR'd and searchable and may contain a breach of business sensitive matter in a public filing. This also increases the file size, leading to retrieval via search.	Annotation failure: FileAttachment	See *CREATE A PDF FROM SOURCE DOCUMENT*
12. PDFs must contain no security locks. The PDF must not be password protected nor have access restrictions. This is necessary for EDIS to build the OCR Search index from the document text and possibly even to allow the recipient to read the document.	Document is encrypted/requires password	See *CREATE A PDF FROM SOURCE DOCUMENT*; *Special Notes on Submitting Patents and Technical References*
13. If confidential information is being redacted from a document for submission of a Public document version, use proper redaction techniques to remove any underlying / non-visible text. Changing the text color to white does not remove the text, neither does pasting a white box over the text. The underlying text is still present and could be read by OCR or by copying the text.		See *REDACT CONFIDENTIAL TEXT*
14. The CD label must reflect submitting firm and investigation information.		See *CD LABEL*
15. The security level on the CD label must be the maximum security of all content and must match the security level of the cover sheet.		
	May encounter Error #2038. This is a general exception when the virus checker is unable to process the file.	Contact EDIS Administrator for assistance.

CD LABEL

Clearly label each CD.   Include information such as:
  a. Investigation Number and short title of the investigation;

b. Security Level, "Public" or "Contains Confidential Business Information Subject to Protective Order", for Section 337 matters. For all others indicate "Business Proprietary Information Subject to Protective Order".
c. Document Type, such as Complaint, Brief, or Exhibit.
d. Party Represented (Complainant X or Respondent(s) X)
e. Firm Name
f. Creation Date
g. Document ID or write it on the electronic media after the EDIS Cover Sheet is created.
h. CD 'n' of 'nnn' to identify multiple CDs in a set.
i. Each electronic media to be submitted should be checked to ensure it has been correctly created, labeled, and contains ONLY the desired content. It is the responsibility of the submitter to ensure that the contents of the electronic media are correct and that media is properly marked and labeled. If applying an adhesive label, the label must be precisely attached to the CD or it may render the CD unreadable.

A sample CD label for submission to EDIS is shown below.

Check each CD before bringing it to the USITC.
a. Ensure the CD is readable.
b. Ensure each CD contains only the files to be submitted.
c. Ensure the documents on the CD match the security level of the submission and label.
d. Ensure there are no viruses on the CD.
e. Ensure all copies contain the same content as the original.

f. Deliver the electronic media submission with cover sheet including a barcode, to the Office of Docket Services, Rm. 112, 500 E St. SW Washington, DC 20436, unless otherwise directed.

If resubmitting the filing because of content errors, please resubmit the same number of electronic media copies as originally filed.

a. If a small textual error is identified, the submitter may request replacement of the single page within a PDF. This should be provided by paper or e-filing. The submitter must serve the errata page on the parties.

b. The submitter may request replacement of a PDF within a set, either via e-filing, paper, or CD. The submitter must re-serve the document on the parties.

CD VERIFICATION PROCESS

As of December 2010, The Dockets Office has the EDIS CD Verification Tool at the Dockets Desk to check the formatting rules on documents contained on CD/DVD media, prior to acceptance into EDIS. This should reduce the number of rejections of CDs and reduce the time to in-process the document into EDIS.

Pre-submission verification: The submitter may choose to test their CD submission before creating numerous copies and the cover sheet. The EDIS CD Verification Tool is available at the Dockets Desk to pre-validate the submission. The submitter may bring a single copy of the CDs to the Dockets Office prior to the deadline for filing to pre-validate the content. The submitter is STRONGLY urged to utilize this service early in the day to allow time for corrections before close of business. The Dockets Clerk will scan the CD and provide the printed report for the submitter. This pre-validation does not automatically ensure later acceptance nor does it extend the filing deadline.

Note: Even if no errors are found, this is not an acceptance into EDIS until the proper number of copies and cover sheet are also provided. Using this process will assist you in meeting a filing deadline, but does not guarantee on-time acceptance of the document. Unfortunately, due to licensing and network limitations, this tool is not available to Firms remotely.

Submission verification: When the CD is ready for final submission to EDIS, create a printable cover sheet for submission. The option to create a cover sheet can be found within EDIS on the Submission Tab. Print the page which includes the assigned Document ID with barcode. Please prepare the same number of copies of these CDs as are required if filing in paper.

Upon presenting CDs to the Dockets Desk, each CD will be scanned using the EDIS CD Verification Tool. A printable report will be available showing that all of the files successfully passed the validation, or showing the errors which were encountered. All errors must be corrected before the document can be accepted.
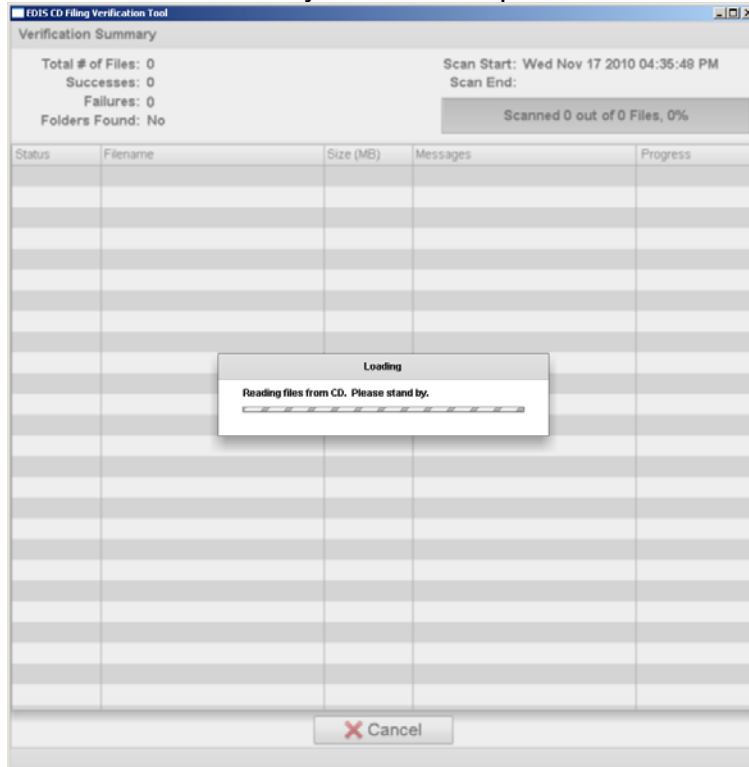
The guidance contained below will assist the submitter in correcting errors which are found by the validation process.

Running the CD Verification Tool

Open the EDIS CD Verification Tool on the Dockets Desktop.
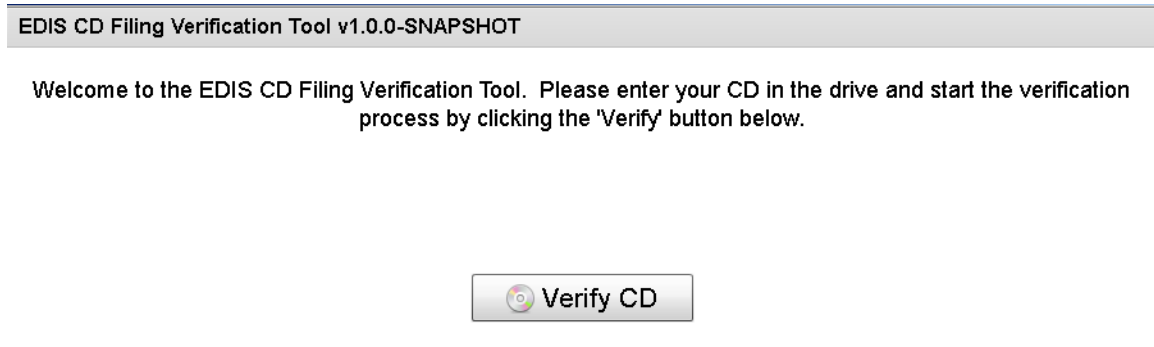
Insert CD. Click Verify CD and the process will start.

Upon completion, a message box will appear indicating the status. Click Ok.

Select the option to Print Report. Select printing destination. Click Done. Remove the CD.

Repeat the process for each CD provided to the Dockets Office. If errors are noted, the CD set will be returned to the submitter for correction. If no errors, the Dockets Clerk will accept the CDs and the CD Verification Reports and then continue with the Dockets processes.

TIPS FOR GOOD CDS

Create a PDF from a source document

There are many methods of creating a PDF from a source file. There are many source file formats, as well as many PDF creation tools.

Scanners can create image files which can be combined into a PDF. Scanners may also have tools to create a PDF from the scanned pages. Consult the documentation to set the PDF properties that meet the requirements for EDIS PDFs, such as choosing an acceptable Acrobat version, removing hyperlinks, and removing attachments.

Of the numerous word processing applications and source document format available, below are instructions for Microsoft Word 2003 and/or Word Perfect X5 with Adobe Acrobat Professional 9. If submitting spreadsheets, it is recommended to copy reformatted data from the spreadsheets into a word processing document, in order to control the page layout and readability.

If you have installed Adobe Acrobat Standard or Professional, you may find an option on the Print menu, to print to Adobe PDF, see PRINT TO PDF for further instructions. You may also find an Adobe PDF menu item on the word processing toolbar.

1. Create a PDF from Microsoft Word in conjunction with Adobe Acrobat Professional:
   a. Open document in MS Word
   b. If Adobe Acrobat Professional is installed after MS Office, the MS Word menu bar shows Adobe PDF as an option. If you have both products and the menu options are still not available, contact your Workstation Administrator.
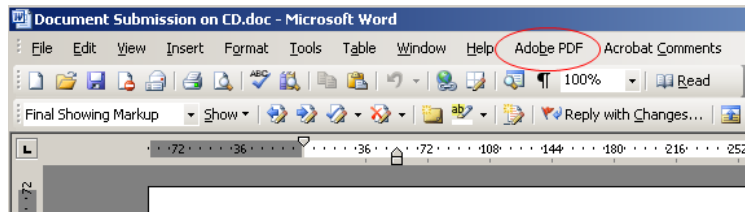
   c. Select Adobe PDF > Change Conversion Settings
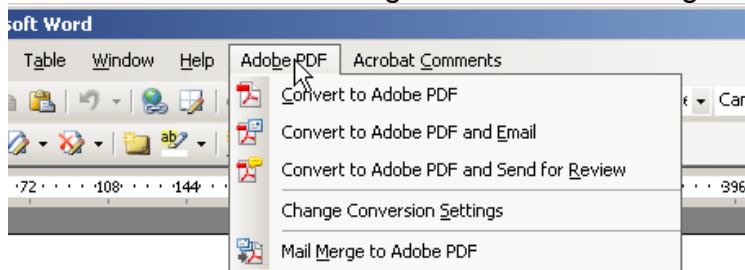
   d. On the Settings tab, select the appropriate PDF preset from the Conversion Settings menu. The PDF preset determines file compression, image resolution, embedding fonts, and other conversion settings.
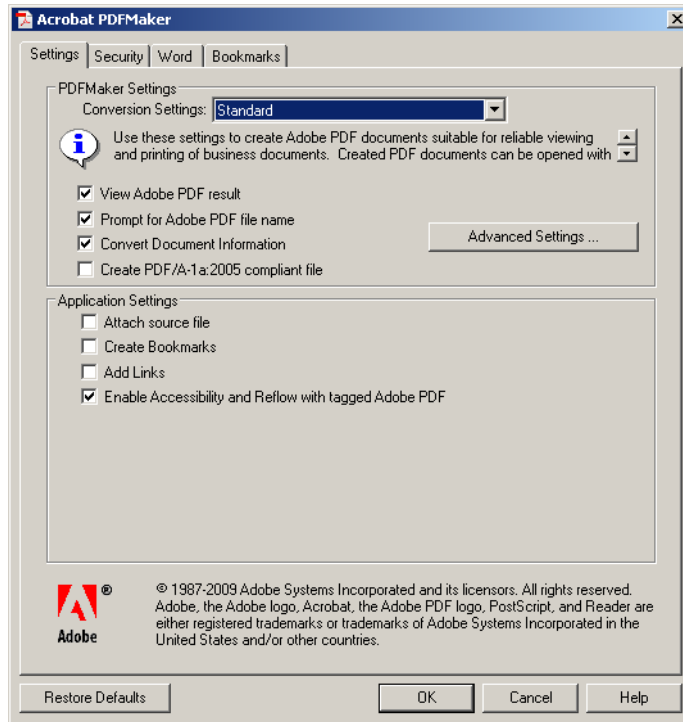
      i. Required:
1. Uncheck "Attach Source File"
2. Uncheck "Create Bookmarks"
3. Uncheck "Add Links";
     ii. Recommended:
1. Check "Enable Accessibility and Reflow with Tagged PDF (enables Section 508 compliance capabilities);
e. Click on Advanced Settings button
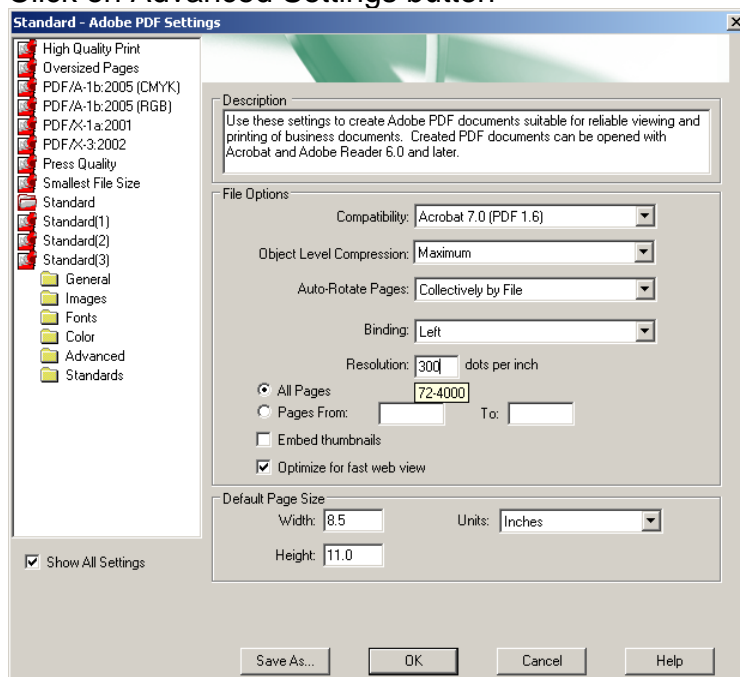
      i. Check Show All Settings

        ii. Create a setting with Acrobat 7.0 (PDF 1.6) as the Compatibility.
       iii. Enter Resolution as 300 DPI.
       iv. Choose All Pages
        v. Choose Optimize for fast web view.
       vi. Set Default Page Size to Width 8.5; Height 11.0; Units Inches.
      vii. Click OK, and save by a new name for the Job Options.

f. Once returned to the Change Conversion Settings page, Click on the Security tab.
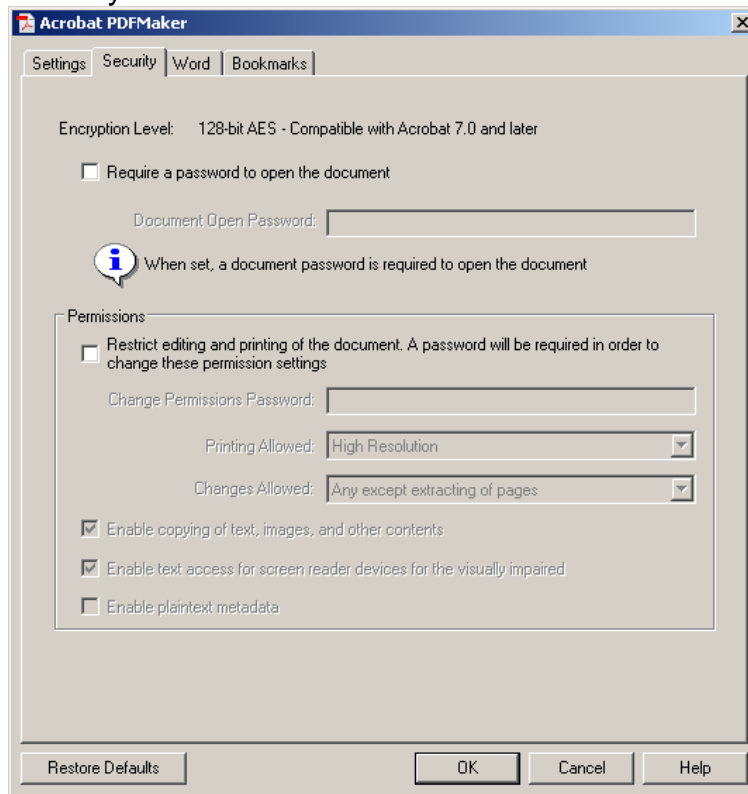
        i. Uncheck 'Require a password to open the document'
       ii. Uncheck 'Restrict editing and printing of the document…'

g. Click on the Word tab.
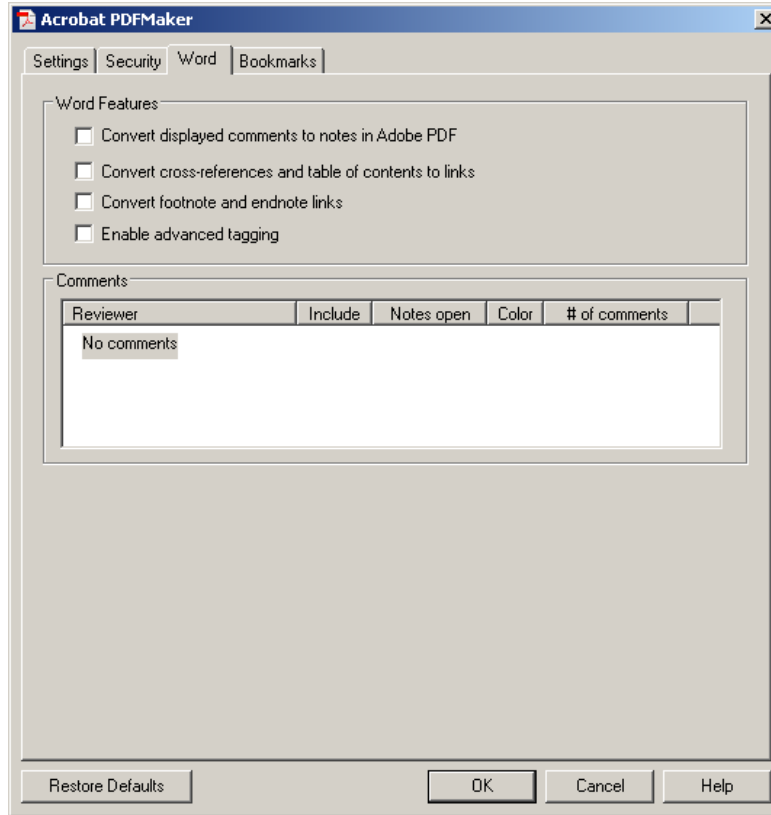
      i. Uncheck all options on this page.

h. Click on the Bookmarks tab
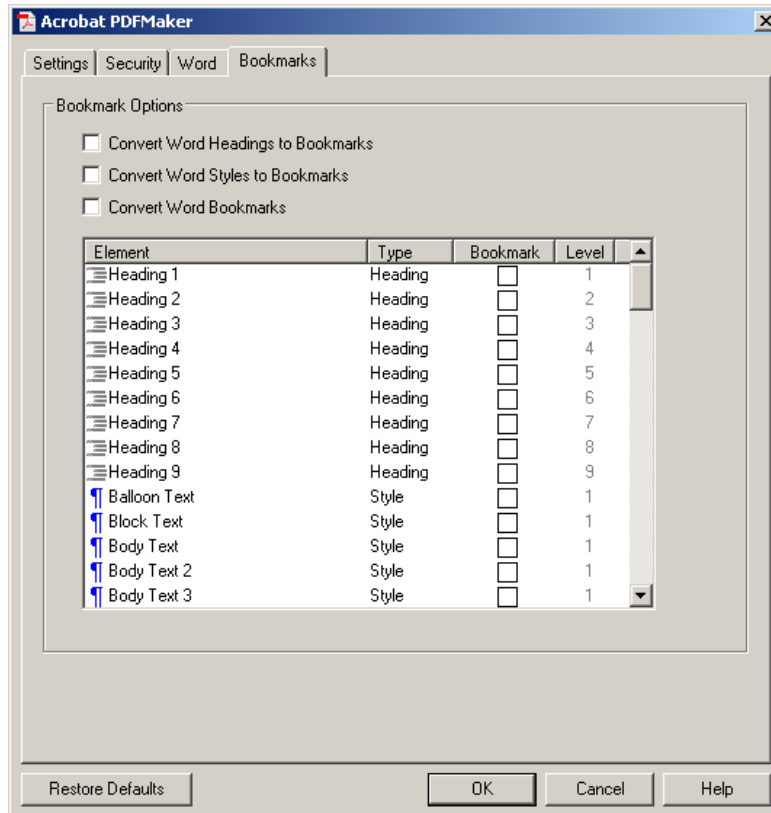
     i. Uncheck all options for bookmarks.
   i. On the Word Menu, click Adobe PDF -> Convert to Adobe PDF
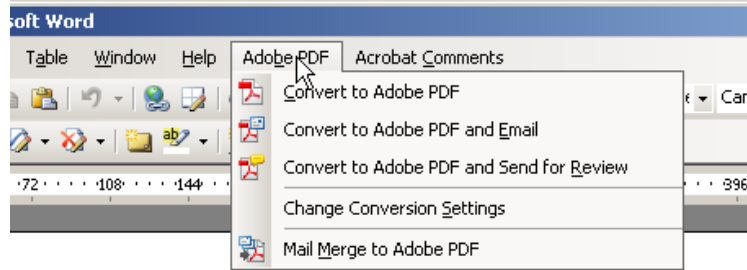
    a. Select folder and file name to save the PDF. Click Save.
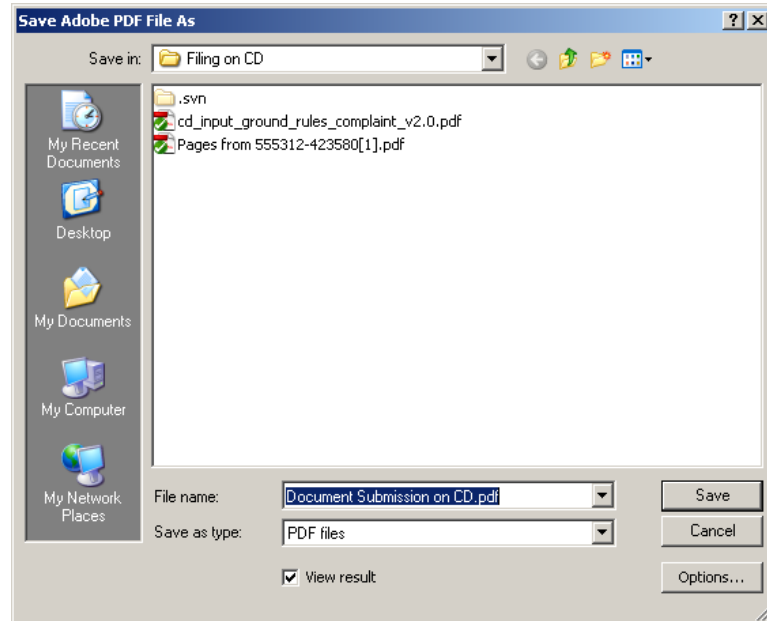
   Acrobat will start up and generate the PDF from the source document.

2. Create a PDF from WordPerfect (instructions for WordPerfect X5 are below) in conjunction with Adobe Acrobat 9 Professional:
  a. Open document in WordPerfect.
  b. Select from menu, File -> Publish to PDF. Enter the desired path and filename to save the PDF, Select Publishing Online and Printing as the PDF Style.
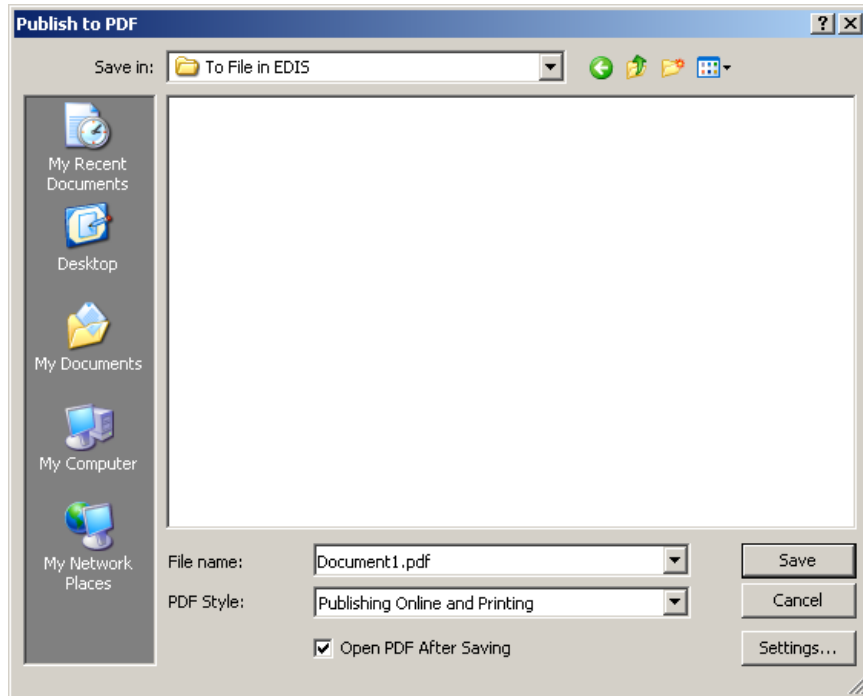
    i. Click on Settings… Button. The following popup is displayed.
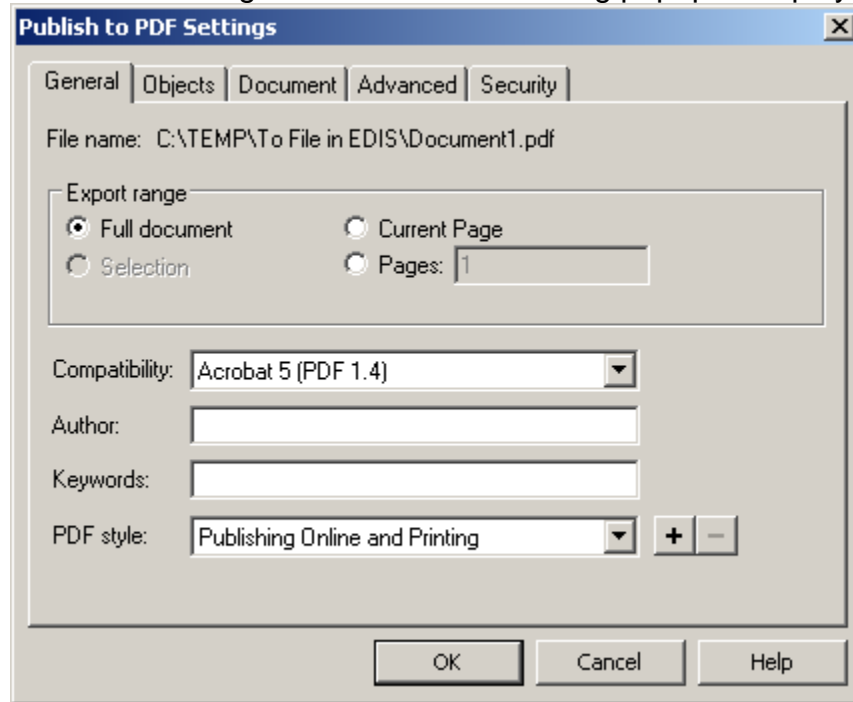
      1. Select Acrobat 5 (PDF 1.4) for the Compatibility option (if Acrobat 7 compatibility is available on the release of WordPerfect being used, please select Acrobat 7 instead).

    ii. Click on the Document Tab.
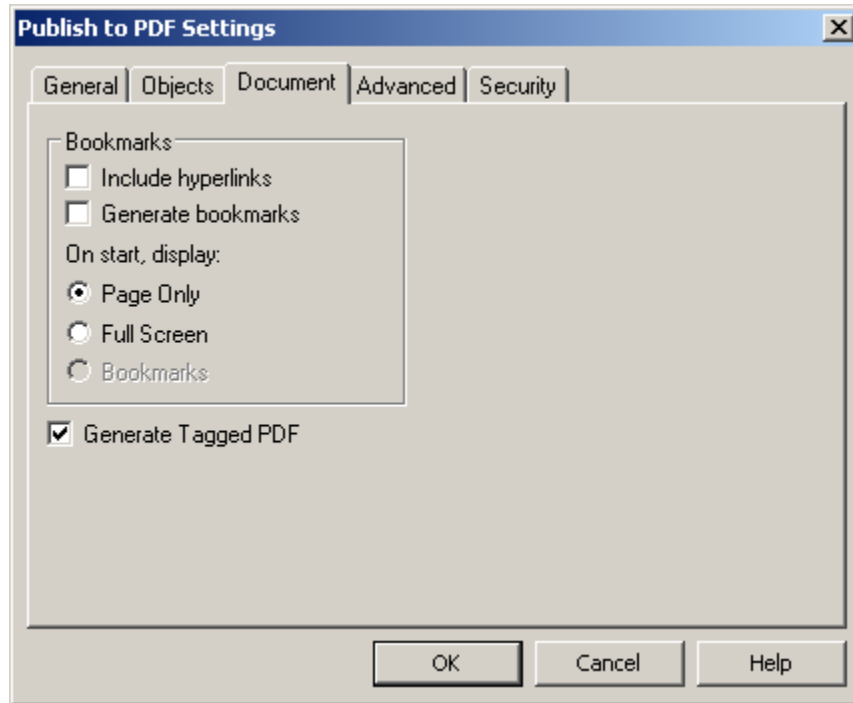
1. Uncheck "Include hyperlinks"
2. Uncheck "Generate bookmarks"
3. Check "Generate Tagged PDF"

iii. Click on the Security Tab
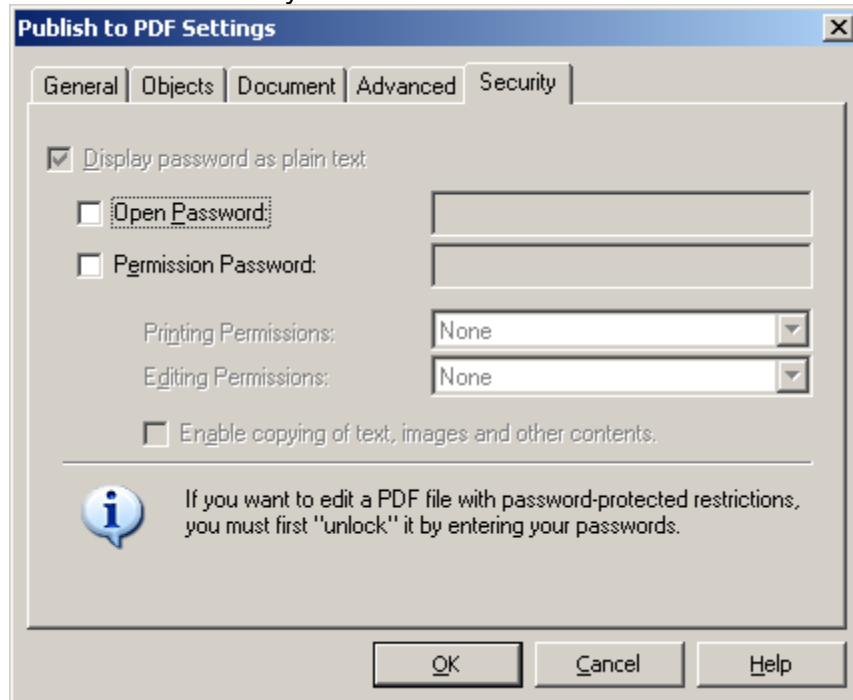
1. Uncheck "Open Password"
2. Uncheck "Permission Password"

iv. After clicking OK, the Publish to PDF page will be redisplayed, Click Save to generate the PDF.

3. Creating a PDF from Image files using Adobe Acrobat 9 Professional:
   a. Most image formats are supported.
   b. Open Acrobat
   c. Select File -> Combine -> Merge Files into a Single PDF…
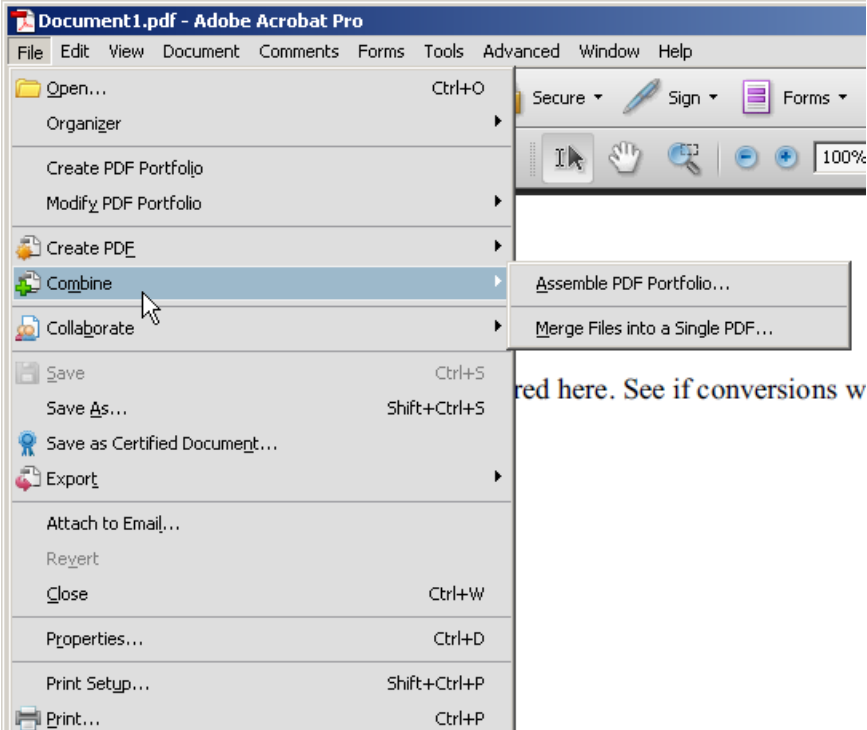
   d. The Merge Window will be displayed
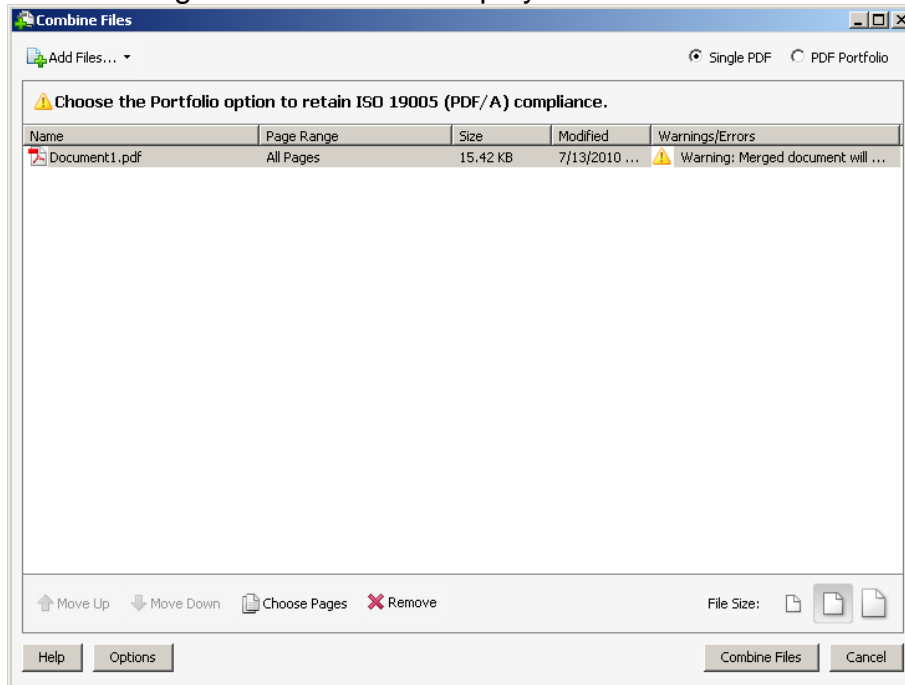
   e. Select Add Files…, and locate and select the images you wish to merge into the document. A range of images can be selected with the

    f.   Click the radio button Single PDF.

    g. Click button Combine Files when all of the files have been selected.

    h. A Save As dialogue to enter folder and pdf name will be displayed. After entering path and file name, click Save.

    i.   Acrobat builds a PDF containing the images and requests that you enter a filename and location to save the new PDF.

Split Large Documents

EDIS is limited to 25 MB per file. This limit provides the optimal performance for retrieving and manipulating PDFs. If the created PDF is larger than 25 MB, it must be split into smaller PDFs to be accepted. Using a logical breakpoint such as on a chapter or exhibit makes the document more readable. Name each PDF so that it can be identified by the content or part it represents of the whole document, such as …Part 1; …Part 2.

If the document was produced by scanning, 300 DPI setting on the scanner makes the document clear for reading and printing, while minimizing the file size. If the document contains images, importing the minimal size image that allows it to be clear is also another option to reduce file size.

Depending on the tool used to create the PDF, the Adobe Acrobat option Document - - > Reduce File Size may significantly shrink the file to meet the 25 MB limitation.

Limit the use of color in the document unless necessary to convey information.

How to split the document when it is in PDF format:
1. Determine the size of the source document.
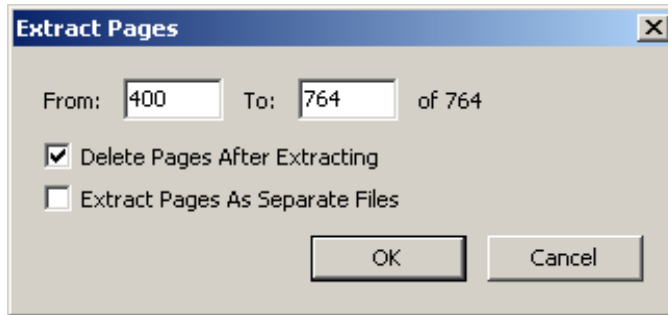   a. This may be done by File -> Properties in Acrobat. See File Size field on the Description tab
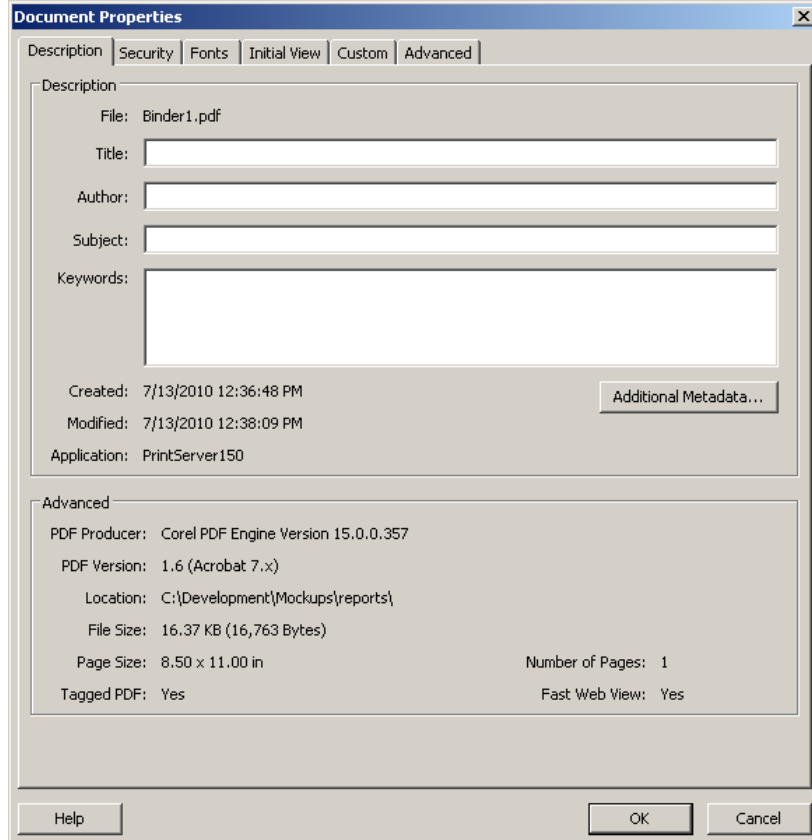
b. Windows Explorer with Document Details shown (View - > Details)
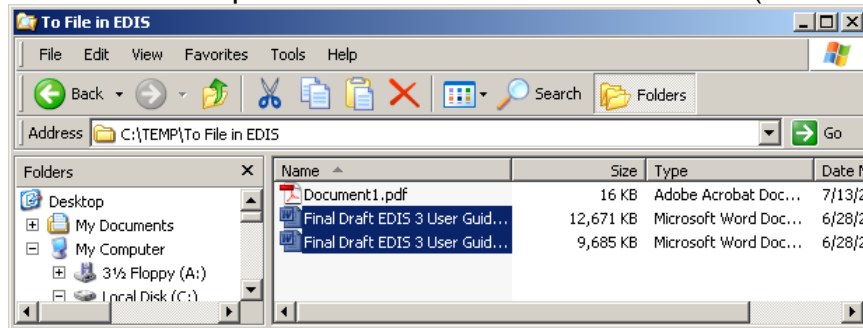

2. Open the large PDF using Acrobat Professional.
3. Click on the Pages tab (upper left corner).
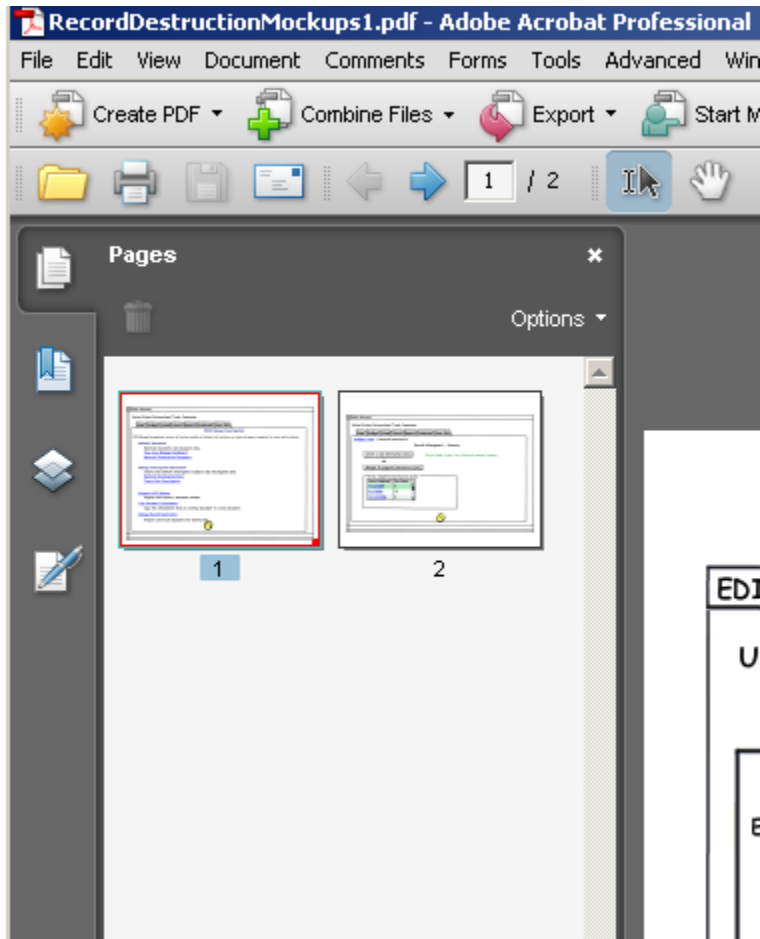
4. Visually determine how many pages out of the total should be split into each section of the document. If the document is 30 MB for example (30,720 KB), then two 15 MB sections would be acceptable. If the document is 80 MB, then you will need at least 4 sections to be split apart. If there are exhibit or attachment separator pages, it is good to break it out by logic parts.
5. Roughly divide the page numbers by the number of sections needed. If the document is heavy on pictures in one section, that section may contain fewer pages since images are larger in size than text. Using the Pages tab, locate the page number of the first and last page to be included in each section.
6. This process works better if you start from the last part of the document and work to the front.
7. Select Document - > Extract Pages from the menu bar.
8. On the Extract Pages popup, enter the page range for the last section. Be sure to include the last page number in the To: field.

Extract Pages

From: 400   To: 764   of 764

☑ Delete Pages After Extracting

☐ Extract Pages As Separate Files

OK   Cancel

9. Check the 'Delete Pages After Extracting' option. Click OK.
10. Acrobat will ask 'Are you sure?' for deletes. Answer yes.

Adobe Acrobat

⚠ Are you sure you want to delete pages 400 to 764?

Yes   No
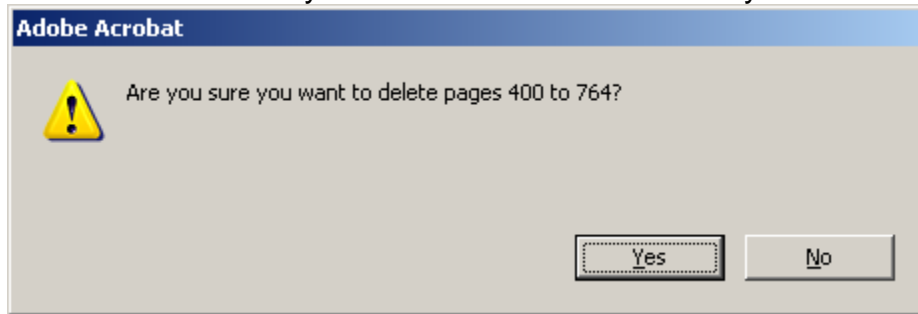
11. The result is two Acrobat windows open with the two documents. Save each PDF separately. From the menu bar, click on File -> Save. The default name for the extracted pages says Pages from… and repeats the original file name. Select the folder to save this document to. Enter the name for the last attachment and click save.
12. If the remaining portion of the document is still too large, repeat the steps above until the documents are sufficiently small to be accepted by EDIS.
The Split Document option in Acrobat only works on files up to 10 MB. Therefore this tool would not be useful for EDIS documents that can be as large as 25 MB.

OCR a Document

1. An Optical Character Recognition (OCR) process should be run on each PDF containing text.
2. Open the document in Acrobat
3. From the menu, select Document -> OCR Text Recognition -> Recognize Text Using OCR. This will make the document text searchable within Acrobat.
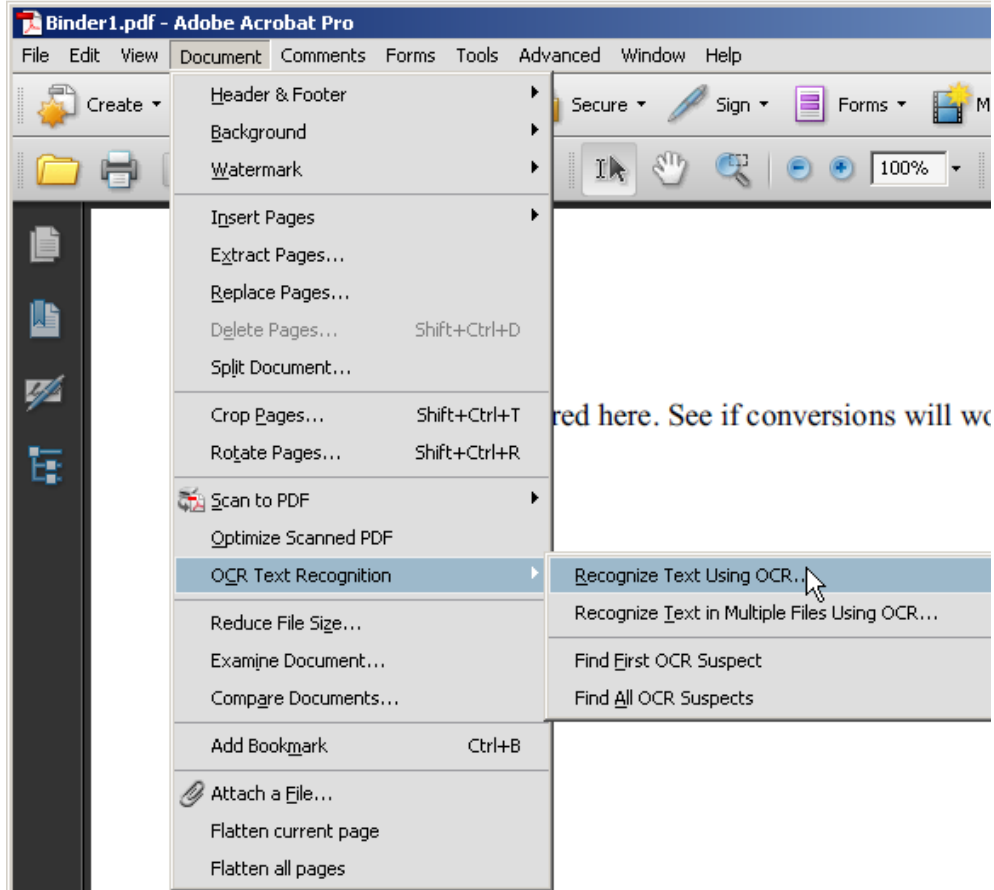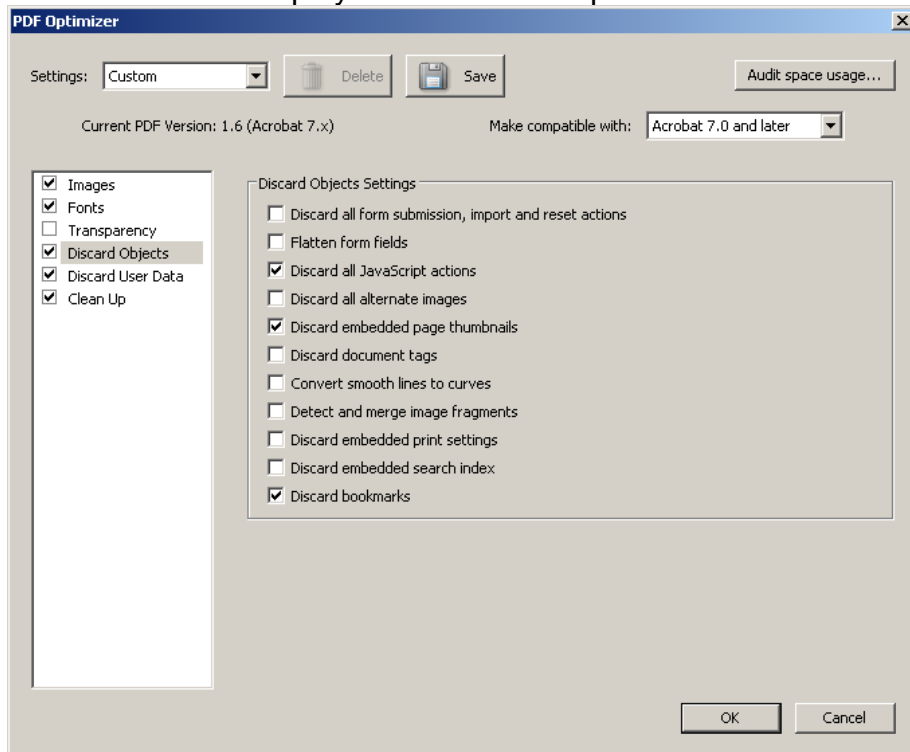
4. Save the document.

Optimize a PDF

If the submitter receives a PDF to be filed and does not have the original source
document (Word, WordPerfect etc.), the PDF will need to be cleansed of
attributes that may cause rejection in EDIS. For example, external links or
JavaScript Actions will cause the entire filing to be rejected by EDIS. The
submitter may need to Optimize the PDF for submission.

1. Open the document in Acrobat
2. On the menu, select Advanced -> PDF Optimizer
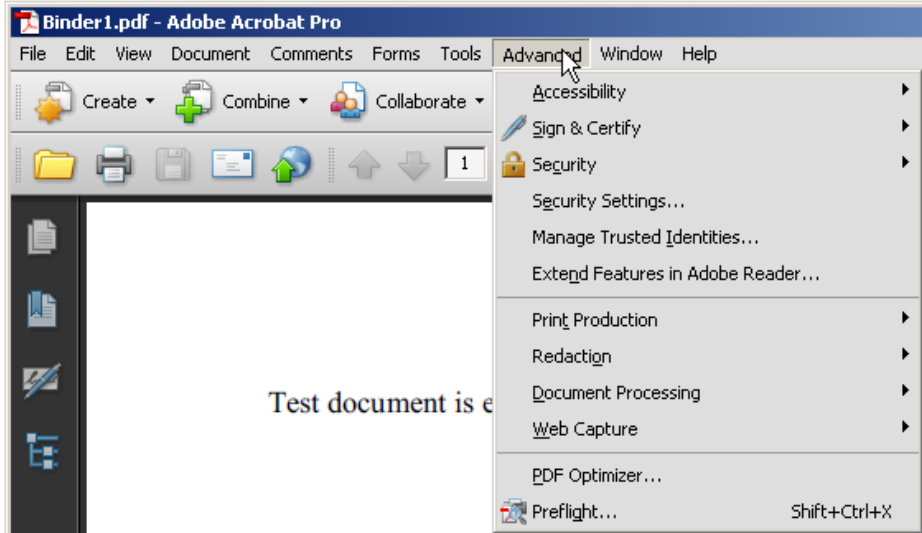
3. A window will be displayed with various options.

    a. Use the 'Make compatible with' option to select the best Acrobat version (Acrobat 7.0 and later is the recommended setting)

    b. On the Discard Objects page, depending on the document content, various options may be chosen. Discarding Javascript actions, embedded page thumbnails, bookmarks is recommended for most EDIS documents.

    c. Click on Discard User Data
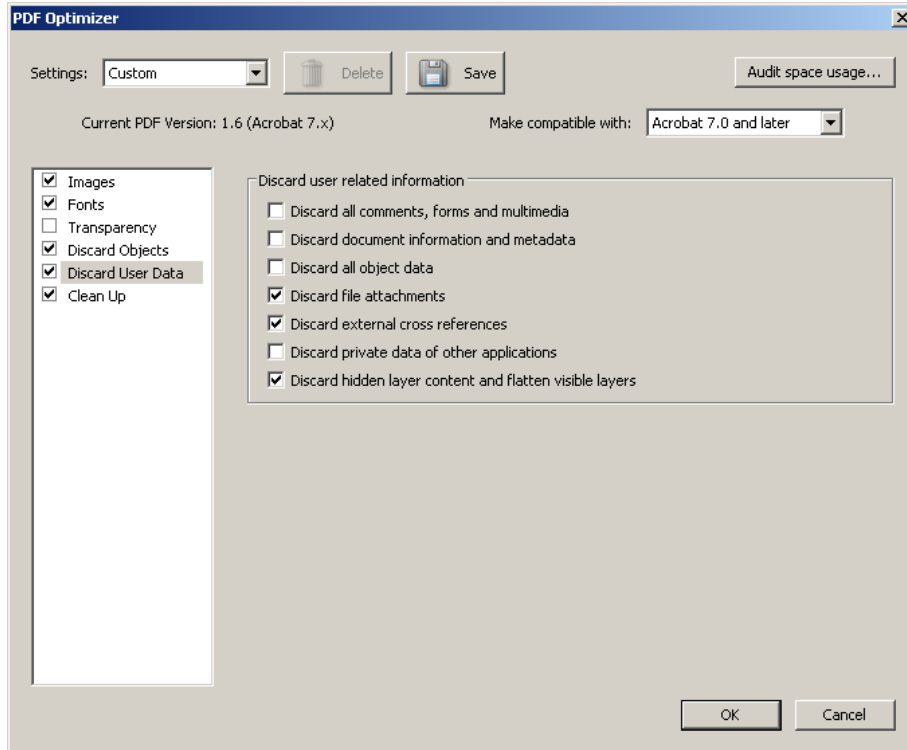
d. It is recommended to Discard file attachments, external cross references, hidden layer content and flatten visible layers.
e. Click on Clean Up
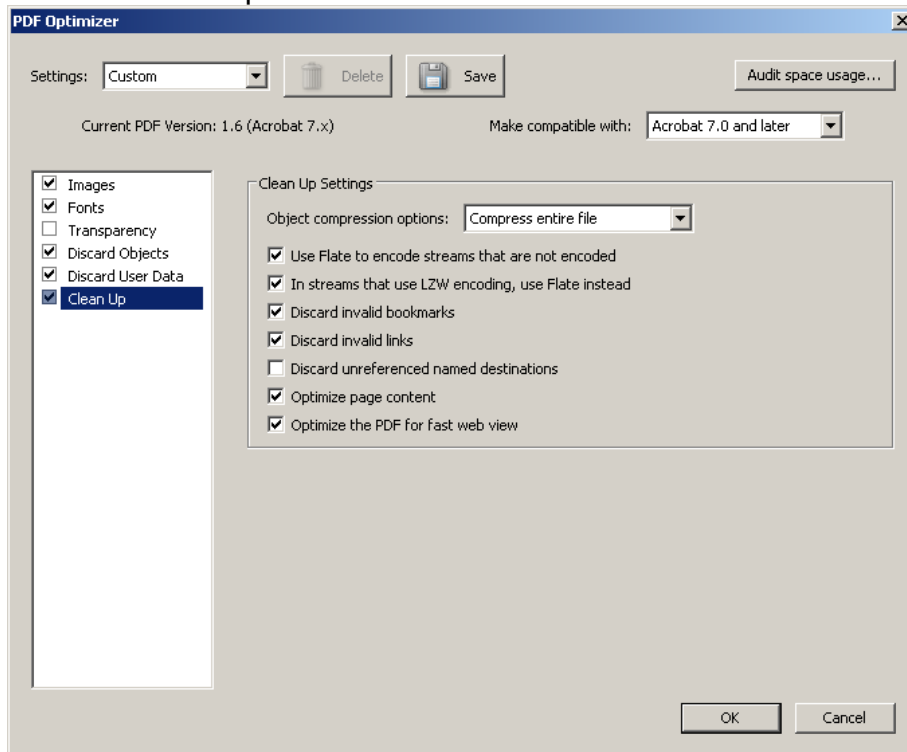
f. It is recommended to check all options except Discard Unreferenced named destinations.

4. Once the options are set, the Save Optimized As window is displayed to select the file path and file name for the newly optimized file. Click Save. Review the resulting document to verify that no content has been lost.

Remove Links

A document may contain links that cannot be processed by EDIS, including links to web pages and email addresses.
1. Open the document in Acrobat.
2. Select Advanced -> Document Processing -> Remove All Links
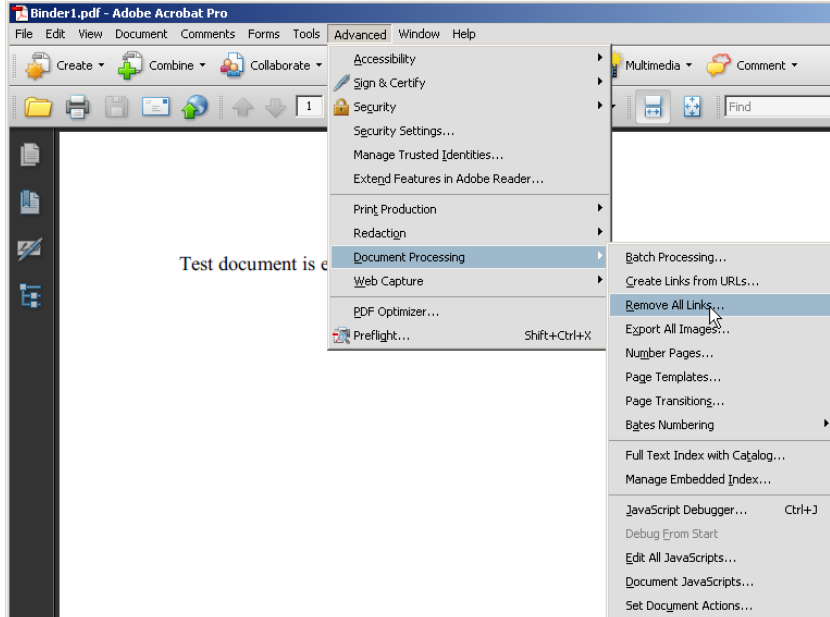
3. You will be prompted for page options and then the action will be performed. Sometimes this is not sufficient to remove all problematic links. Print to PDF will remove all links. (HOW TO: See **PRINT TO PDF**)

Print to PDF

If you are using Acrobat Professional, a print driver may be installed to create PDFs using the print menu.
1. Open Document in Acrobat
2. File -> Print
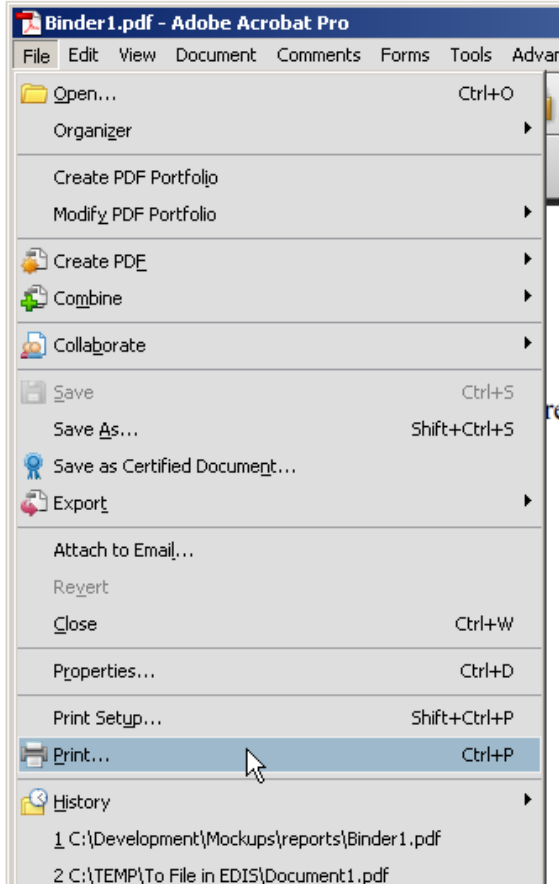
3. On the Print window, for Printer Name, select Adobe PDF. (If not installed, please contact your workstation administrator.)
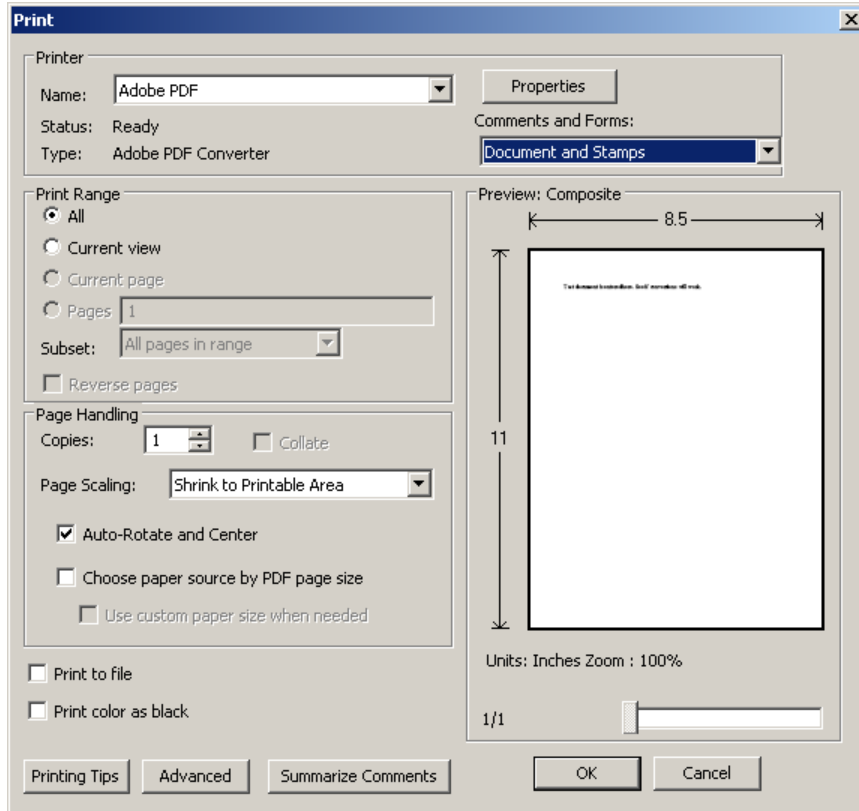
4. If needing to flatten signature images, stamps containing Exhibit numbers, etc, select on the Comments and Forms dropdown: Document and Stamps.
5. Click OK. You will be prompted for the file path and file name to save the new PDF as.


Flatten Layers

For most of EDIS filings, comments, annotations, approval stamps and the like are intended to be removed before filing with the USITC. A feature used by some law firms to add unique exhibit numbers to the created PDFs, is using the STAMP feature. This type of annotation is not accepted in EDIS, therefore an additional step must be taken to 'flatten' the Exhibit number stamp onto the document.

Documentation and a javascript to install in Acrobat are available on Adobe Legal Blog
http://blogs.adobe.com/acrolaw/commenting_annotations_and_stamps/ See
1. 'Try these Two-line Dynamic Exhibit Stamps' September 12, 2009
2. 'Add a Flatten Document Menu Item to Acrobat' February 24, 2010
   http://blogs.adobe.com/acrolaw/2010/02/add_a_flatten_document_menu_item.html#more
3. A batch process can be set up to flatten a directory of pdfs. In the Acrobat menu, select Advanced -> Document Processing -> Batch Processing…
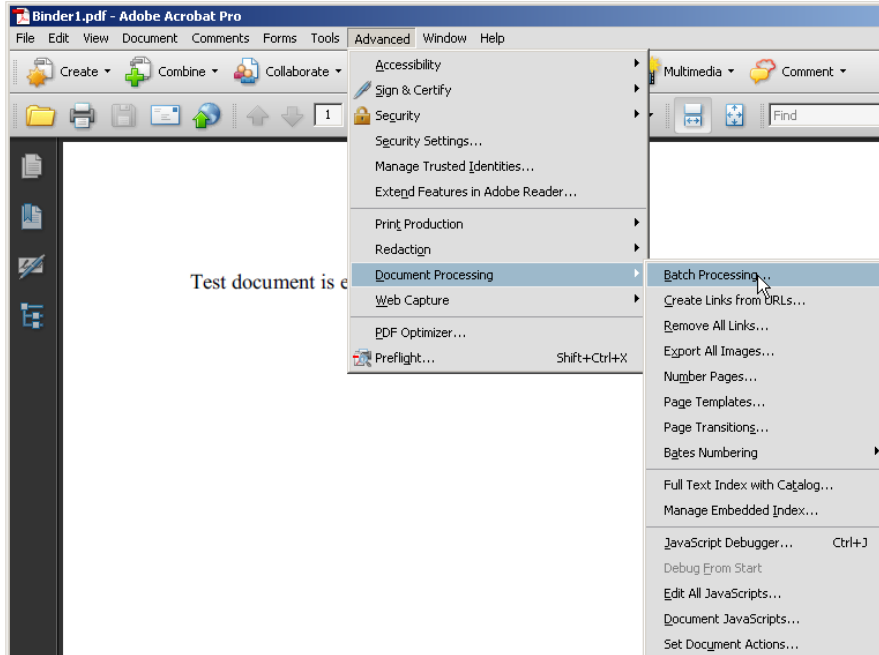
4. Set up a script to execute the flatten function on all files in a directory. You can specify to generate the flattened pdfs in an output directory.
5. To create the batch process, click on the New Sequence… button.
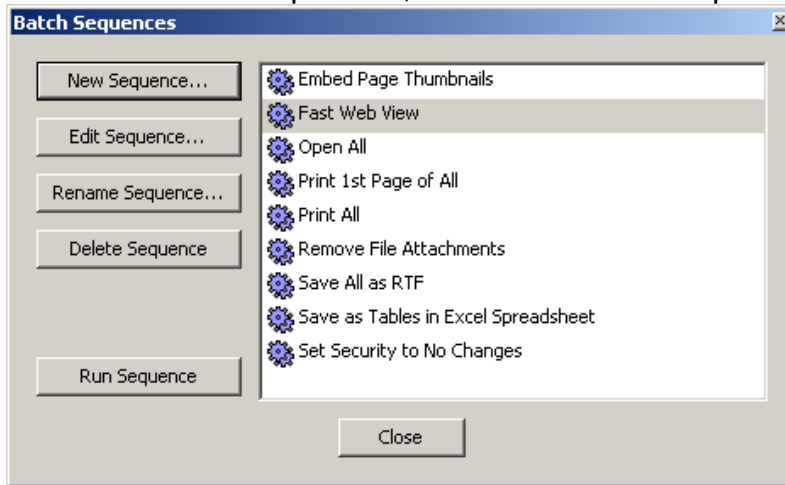
6. Type in a name for the new sequence, such as FlattenPDF, click OK.
7. You will see the Edit Batch Sequence window, click on Select Commands… button.
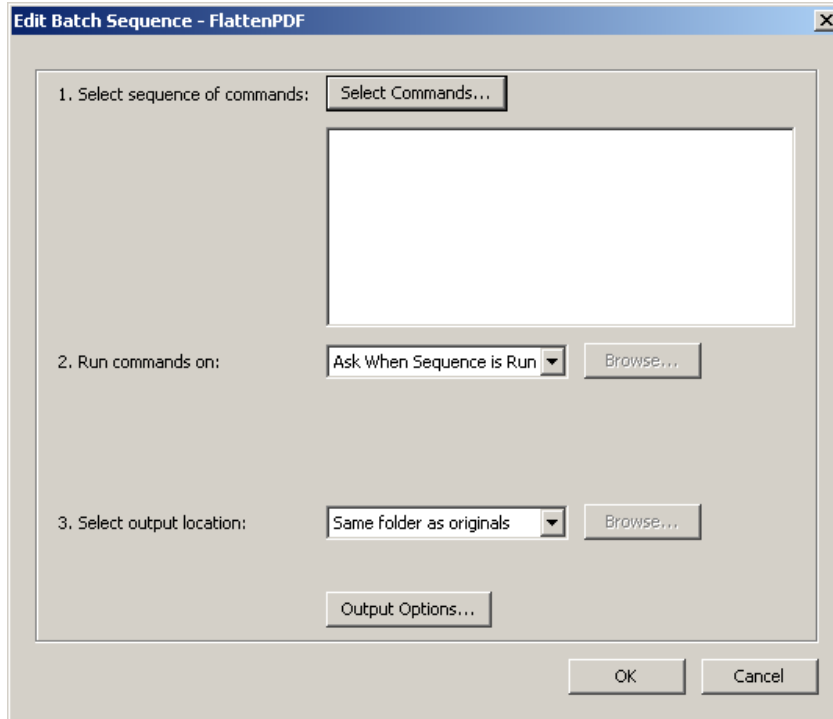
8. On the Edit Sequence window, click on JavaScript -> Execute JavaScript and click Add>> button.
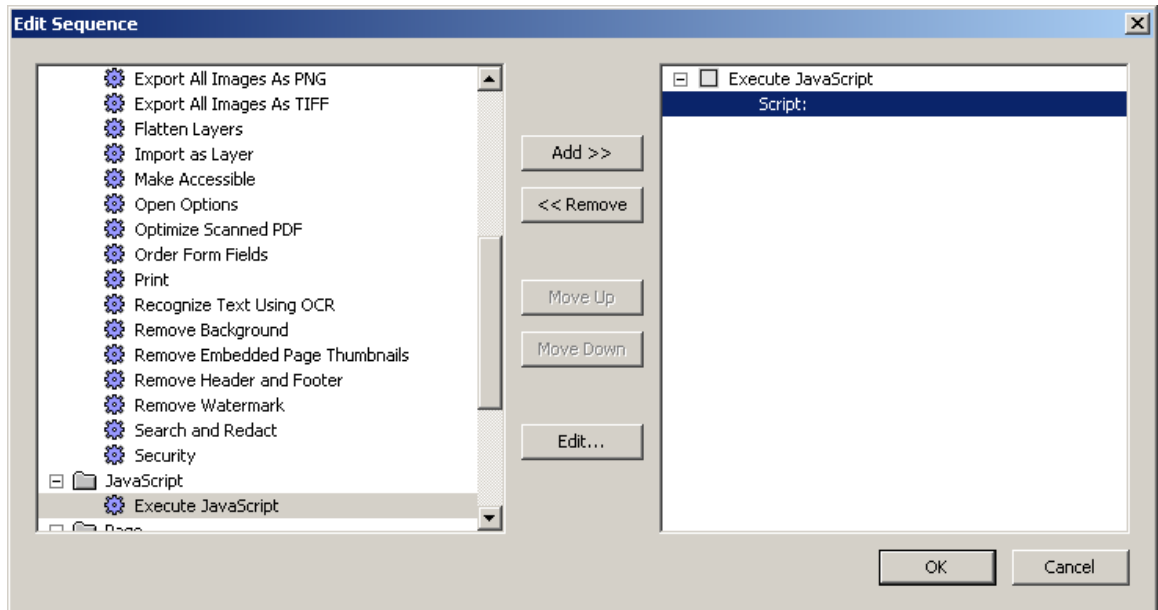
9. Click on Edit… button and add this.Flatten() in the Javascript Editor window, click OK. (Note: the flatten.js must be added per the blog instructions for flattening pdfs as a pre-requisite for this action).

10. On the Edit Batch Sequence, if desired, you may specify Run Commands on: 'Ask When Sequence is Run'. This will prompt you for the source PDF directory. 3. Select output location: can also be set to 'Ask When Sequence is Run' to prompt the user at the time it is run. Output options button may be selected if new file names are desired on the converted files.
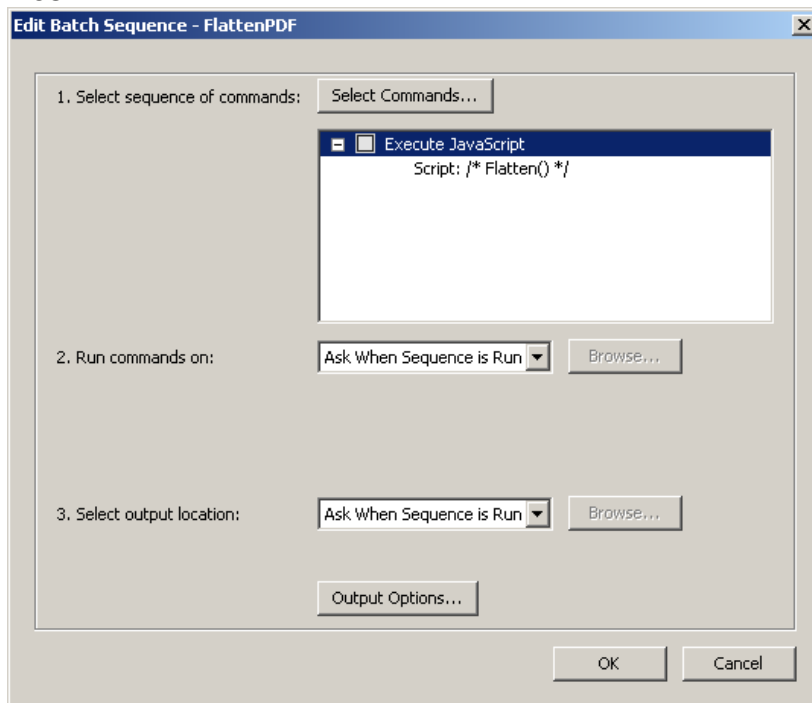
11. To execute select Advanced -> Document Processing -> Batch Processing then click on FlattenPDF and execute Run Sequence.. button
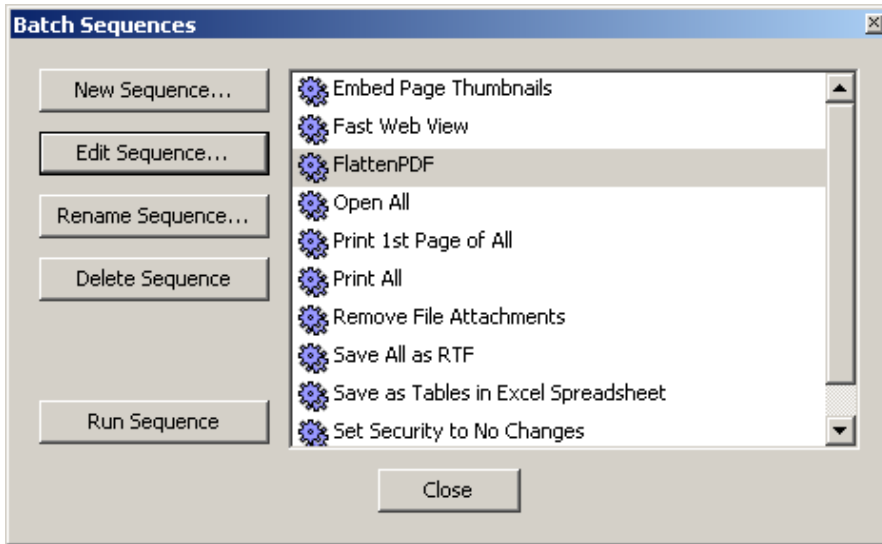
12. Run Sequence Confirmation will be shown. Click OK button to start process.
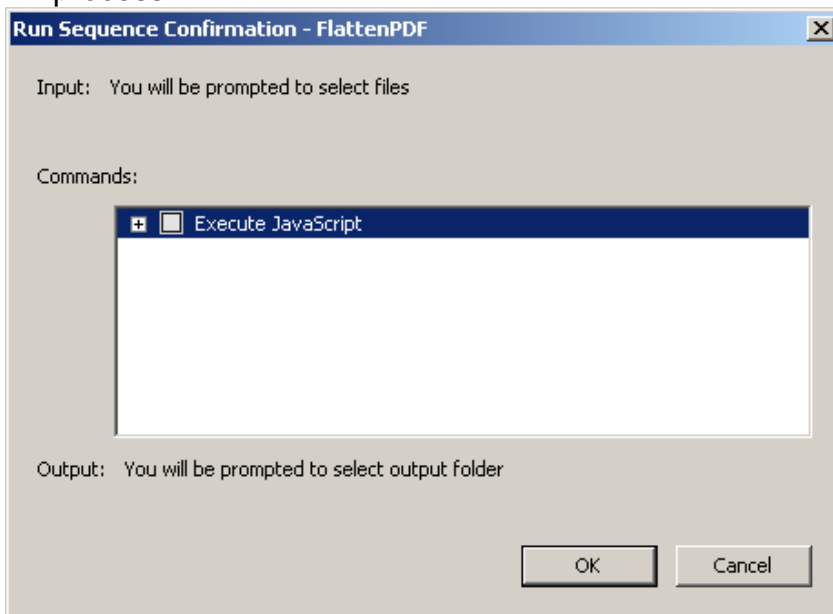
13. Select the files to process. Shift and/or Ctrl key will allow multiple files to be selected. Click Select button.
14. When prompted, select the directory to output the flattened PDF to. Click OK.
15. You will be prompted with 'Are you sure?' for each file, Click OK.
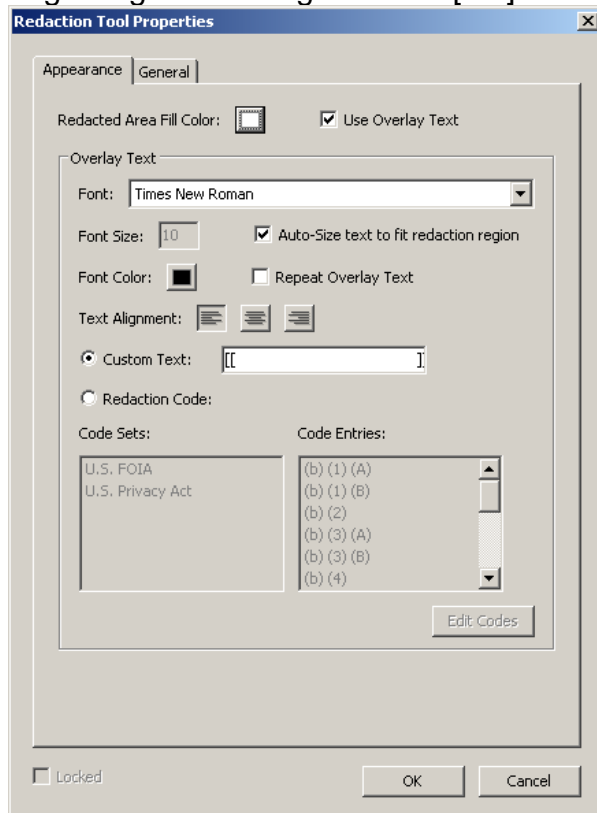

Redact Confidential Text

Some documents require submission of a confidential version and a public version of the text. The confidential information must be redacted to create the public document before submission to the USITC. Redaction should totally

remove any confidential text from view and from the underlying electronic source, but retain the pagination and spacing of the original document.

1. Redaction by rescanning – this technique makes certain that a clean redacted copy is submitted to the USITC.
    a. Print the confidential version of the document and remove, cut out, white out the confidential material.
    b. Scan the resultant paper document into a PDF for submission.
2. Acrobat Redaction function
    a. A Redaction function is available in Acrobat, under Advanced -> Redaction menu.
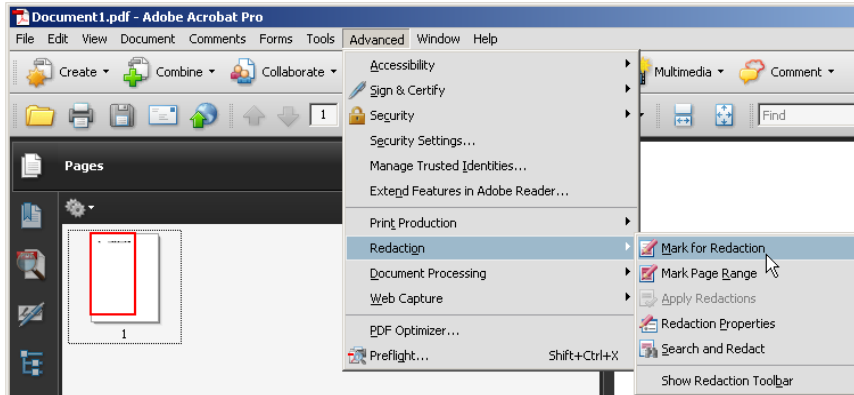
    b. Select the 'Redaction Properties' first, to select the redaction block color (select white) and/or desired replacement text, such as beginning and ending brackets [   ].

      c. From the Advanced → Redaction menu, Select 'Mark for Redaction' and mark the document confidential portions.
      d. From the Advanced → Redaction menu, select 'Apply Redactions' to permanently make the changes.
      e. Save the PDF for submission.
3. Other Redaction macros or tools
      a. Other tools and macros are available for redaction. With some tools, the user marks the text to be removed with double brackets, and the processing function removes any content between the brackets – leaving the brackets as placeholders.

Special Notes on Submitting Patents and Technical References

Filings in Section 337 cases typically include patents and patents used for technical references as part of the submission to EDIS. These tend to be problematic for CD submission. Occasionally, a firm may obtain electronic pdf versions of patents from the United States Patent and Trademark Office (USPTO) to be submitted as part of a Complaint to the USITC. Many of these PDFs exceed the EDIS 25MB size limit and frequently are PDF 1.2. They may contain passwords and encryption.   The document may be set to disallow extracting pages. If a clean copy without security settings cannot be obtained, the only solution may be to print the document and then scan it. Then, create the PDF from the image files.