

LETTER PERFECT

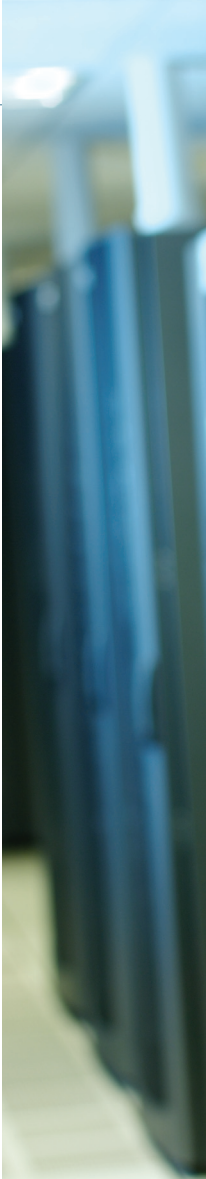
Consolidation, archiving, and compliance generates tangible returns for ING Investment Management Group

By Levi Crowe

To many people the letters “ING” are nothing more than a suffix that adds action to verbs: eat becomes eating, think becomes thinking, and so on. To many others, however, “ING” is a means to doing things such as compounding interest, growing personal and corporate investments, or providing a range of financial services in more than 50 countries.

ING is the acronym (and the legal name) that evolved from Internationale Nederlanden Groep, the Dutch-based financial services giant formed by the 1991 merger of the insurer Nationale-Nederlanden and the banker NMB Postbank Groep. A child of the wave of economic liberalization and privatization that swept Europe during the early 1990s, ING is the culmination of more than 250 years of growth, mergers, and acquisitions, with roots reaching back to Koog in Holland in 1743.

To Mark Kolodziej, VP of IT and head of the Infrastructure Services Department (ISD) for ING Investment Management Group, LLC, ING means he is a very busy technology executive, managing a complex web of compliance regulations while struggling to contain costs amidst daily operational growth. “It’s resource- and administrative-intensive,” he says of the operations he oversees, which support the more than US\$400 billion in assets ING Investment Management Group manages in North America. “It’s not discretionary whether or not we comply, and that corresponds directly to head count and impacts how staff spend their time.”





Kolodziej has been with ING Investment Management Group for 10 years, half of which have been under the shadow of the regulatory compliance edicts that began with the U.S.'s Sarbanes-Oxley Act (SOX) of 2002. Like other organizations, ING Investment Management Group has put a number of processes and procedures in place to meet regulatory requirements, though not without challenges. "Personnel become less and less motivated with each new requirement," he says. "They've already jumped through so many hoops, it's difficult for them. In some respects, it's become a witch hunt as to how low you have to go to be compliant because there are so many gray areas."

Simple things, he says, such as a developer moving something into production, are no longer simple. "We have to separate out duties and have multiple bodies involved. What one person might have been able to do before requires a change-control form now and involves other personnel and other groups. Things take twice as long to accomplish as they used to take. The cost and complexity that have been added into our IT environment are enormous."

To combat compliance fatigue, Kolodziej attempts to make things as simple as possible. "That might mean

having mandatory fields or pre-populated form fields," he says. "I assigned one person just to interfacing because I knew it would consume a significant amount of staff time. That helps keep our IT processes centralized."

Consolidation lifts burden

At the same time, seeking greater operational efficiencies and lower costs, ING Investment Management Group embarked on a major IT infrastructure initiative, designated as Atlas, which included, among other elements, consolidation of a silo-based, disparate storage environment.

After conducting a thorough RFP process, Kolodziej and his team selected Symantec Partner Network Appliance as its primary storage technology provider. Working with the Network Appliance Global Services team, the ISD team designed and implemented a storage area network (SAN) based on NetApp hardware and software.

"We actually boot off the SAN now," Kolodziej explains. "The operating systems sit on the SAN, and those are replicated almost continuously around the clock. Software patches, updates, everything is run through there. We have identical hardware on the other side, and we can power up and be running in minutes."

The next-generation storage infrastructure is configured into three tiers, with data allocated to a specified tier based on its criticality. This tiered storage approach reduced storage costs by more than 30 percent. In addition, the storage consolidation effort allowed the ISD team to reduce the number of data center servers by nearly 200 percent, equating to approximately US\$750,000 in savings.

It's not going to get easier anytime soon

ING Investment Management Group is spread out across three primary sites located in Atlanta, New York, and Hartford, Connecticut, and three secondary sites located in Minnesota, Arizona, and Colorado. As part of the Atlas initiative, the ISD team identified email archiving and e-discovery as critical areas to address. Email plays an important role at ING Investment Management Group. "Because our operations are so distributed, we're very much a virtual organization with virtual teams throughout. We have phones, but people aren't always at their desks—email is vital."

With this level of importance came challenges. Email volume was growing at a rate of 100 percent annually, and end users were exceeding their email storage quotas and moving their files off to PST folders. For the reason of compliancy, the latter was a concern. And the management of PST files was a productivity drain on end users. In addition to email, Kolodziej wanted to address unstructured data into

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Mark Kolodzej, VP of IT,
ING Investment Management Group

this larger solution, as such data must be produced when requested by regulatory agencies or during litigation. Storage cost was also a core consideration. Kolodzej and his ISD team wanted to store email and unstructured data on less-expensive storage while compressing files through single-instance messaging.

The ISD team selected Symantec Enterprise Vault software and enlisted Symantec Consulting Services to help implement the solution. They also selected Enterprise Vault options that included PST Migrator, Microsoft Exchange Journaling, File System Archiving, and Compliance Accelerator. The initial deployment was for 900 users, with subsequent roll out to more than 2,400 today.

Because of the close integration between Enterprise Vault and Network Appliance technologies, the ISD team was able to leverage lower-cost, Tier 2 storage for email archiving and e-discovery. This transition to tiered storage

reduced storage costs for email and unstructured data archiving from US\$60 per gigabyte to US\$45 per gigabyte. This alone is projected to save ING Investment Management Group more than US\$1million over the next three years.

Shrinking costs and time

About once a month, the ISD team receives an e-discovery request. “Before we implemented Enterprise Vault, we took two to three weeks to respond to each discovery request. Today, it’s about two to three days. We’ve reduced the time by around 80 percent,” says Kolodzej. “That saves us about US\$70,000 per year. We will shrink this further once we deploy Enterprise Vault Discovery Accelerator.”

The implementation also means that the company no longer has to dedicate about 100 hours a week from its desktop management unit to help end users with PST file management issues, saving about US\$100,000 year. “It accelerated our consolidation efforts, and we have increased the stability of the files and decreased recovery point objectives. Our end users no longer need to worry about their email quotas,” Kolodzej says.

Email is captured in virtual real time using the Microsoft Exchange Journaling option, which helps ensure that no email messages are lost. “We have been journaling to the WORM (write-once, read-many) area. Using Enterprise Vault, we are able to get a radio button that we can use to search instant messages and emails,” Kolodzej explains.

The Compliance Accelerator option is used by the Compliance Department at ING Investment Management Group

for compliance tracking. “They gather their own data,” Kolodzej says. “Without Compliance Accelerator, our Help Desk would be inundated with calls for every audit.”

Information proliferation

The profusion of information available on messaging management and consolidation efforts can be overwhelming. But don’t believe everything you read in the industry reports, Kolodzej cautions. “Consider the impact of any architectural changes you make as a result of regulatory requirements and consider the effect that will have on the number of servers you need. Consider your vertical market, too. There are some applications that vendors will not support in a shared server environment. You need to take that into account when you’re estimating how many new servers you will need.”

If the past five years of coping with regulatory requirements have taught Kolodzej anything about his regulatory compliance strategy, it is to “go with your gut. By now, people have a good idea of the types of things they should and shouldn’t have access to. If you find a loophole, close it. If you see a problem, fix it. If you’re not sure, be proactive and bring it up to management. That helps you get out in front of things instead of having to deal with them after the fact.”

Going forward, Kolodzej and his ISD team are looking at expanding data encryption to tighten security even further. They also plan to engage in a more proactive monitoring of the IT environment. “We want to do additional monitoring at the application level. If we can’t fix the problem before the user ever sees it, at least we can see it before they call the Help Desk.” ■

Levi Crowe writes about business and technology for the Fortune 500.

Investing in IT

IT environment at ING Investment Management Group includes:

Storage: Network Appliance and HP
Servers: HP-UX and Microsoft Windows
Databases: Oracle and Microsoft SQL Server

Symantec solution includes:

Symantec Enterprise Vault with:
Compliance Accelerator; PST Migrator;
Microsoft Exchange Journaling; File
System Archiving
Symantec AntiVirus Enterprise Edition
Symantec Consulting Services
Veritas CommandCentral Storage
Symantec Business Critical Services

Learn more about Symantec Enterprise Vault. Visit symantec.com and click on Enterprise Solutions.