

OFFICE OF INSPECTOR GENERAL

Information Collection on USITC Internet Servers

**Inspection Report
OIG-IR-02-01**



February 16, 2001

I. INTRODUCTION

The United States International Trade Commission (Commission) is an independent, quasi-judicial, nonpartisan Federal agency established by Congress with broad investigative powers on matters of trade. The mission of the Commission is twofold: administer U.S. trade remedy laws in a fair and objective manner; and provide the President, U.S. Trade Representative, and the Congress with independent, quality advice and information on matters of international trade and competitiveness. Major Commission activities include: import injury investigations, intellectual property-based investigations, research, trade information services and trade policy support.

II. OBJECTIVE

The objective of this inspection was to perform a comprehensive review of the Commission's collection of data by its public Internet servers.

III. SCOPE AND METHODOLOGY

This inspection was conducted between January 25, 2001 and February 5, 2001 at the Commission's Office located at 500 E Street, S.W., Washington, DC. The Office of Inspector General (OIG) interviewed the Trade and Tariff Information Manager and employees in the Office of Information Services. Commission office directors were given an opportunity to comment on a draft of this Inspection Report. Those comments were appropriately incorporated.

The OIG reviewed Office of Management and Budget (OMB) guidance, General Accounting Office (GAO) reports and information available through the web sites of the Chief Information Officers Council and the General Services Administration. OIG reviewed all Commission public web sites and sample copies of logs produced by the Commission's Internet servers. OIG also used analysis tools available on the Internet.

Based on the information obtained and reviewed, the OIG developed the following independent findings.

IV. FINDINGS

The Commission delivers information and services via the Internet using numerous public and non-public web sites. The public web sites are sites in which the Commission provides public information and services to the general public. On the Commission's non-public web sites, access is limited to employees of the Commission or working groups of government employees. Several web servers that have various hardware and software configurations service both the public and non-public web sites. This review focused on the Commission's public web sites:

- **Home Page:** The <http://www.usitc.gov> site serves as a portal to the other public web sites of the Commission. This site also contains general information and news about the Commission, most agency publications and access to the Harmonized Tariff Schedule. The Commission also provides ftp services on this server at: <ftp://ftp.usitc.gov/>.

- **EDIS On-Line:** The <http://dockets.usitc.gov> site provides access to docketing information and access to public documents filed with the Secretary's Office in Commission investigations. The site can be used to view page images and request print copies of the public documents filed in Commission investigations instituted since 1996.
- **Section 337 Cases:** The <http://info.usitc.gov/337> site contains Section 337 case history information.
- **Sunset Reviews:** The <http://info.usitc.gov/oinv/sunset.nsf> site contains general and scheduling information regarding the Commission's Five Year Sunset Reviews.
- **DataWeb:** The <http://dataweb.usitc.gov> site offers various trade and tariff data.
- **Library Catalog:** The <http://205.197.120.8/webopac/cgi/swebmnu.exe?act=3&ini=splusweb> site contains a searchable copy of the Library Catalog.
- **Directory:** The <http://radiator.usitc.gov> site contains a searchable copy of the Commission's phone book.

Log Files

The Commission's public web servers and firewall automatically create separate log information about visitors to Commission web servers.

The Commission uses a firewall to collect data regarding any access or attempted access to Commission Internet resources. Specifically, the firewall log records the visitor's IP address information and data similar to that collected by the public web servers. The firewall log also records attempts by visitors to perform improper actions against agency resources.

Table 1 below charts specific information collected by the Commission's public web servers.

TABLE 1

Information Collected	http://www.usitc.gov	ftp://ftp.usitc.gov	http://dockets.usitc.gov	http://info.usitc.gov	http://dataweb.usitc.gov	Library Catalog	http://radiator.usitc.gov
Date/Time Internet Server Accessed	X	X	X	X	X	X	X
IP Address of Visitor	X	X	X	X	X	X	X
Username		X					
Server Name & IP Address	X	X		X	X		X
Hypertext Transfer Protocol Request Method	X	X	X	X	X	X	X
File or Page Requested	X	X	X	X	X	X	X
Status of Request	X	X		X	X	X	X
Size of File or Page	X	X			X		X
Time to Complete	X	X			X	X	X
Visitor's Browser Type	X			X	X	X	X
Visitor's Operating System	X			X			X
Visitor's referring Web page	X			X	X		X

Cookies

A cookie is a short string of text that maybe sent from a web server to a web browser when the browser accesses a web page. Generally there are two types of cookies: session cookies and persistent cookies. Session cookies are short-lived, are used only during the browsing session, and expire when the visitor quits the browser or sooner. Persistent cookies specify expiration dates, remain stored on the client’s computer until the expiration date, and can be used to track visitors’ browsing behavior by identifying their Internet addresses whenever they return to a site. *GAO-01-147R, Federal Use of Cookies.*

Our review of the Commission’s use of cookies revealed the Commission does not use any persistent cookies but uses session cookies on several of its Internet sites (See Table 2). In general, session cookies are used by the Commission on several sites to collect basic information regarding site access. Also, session cookies are used on the <http://dockets.usitc.gov> site to keep track of the number and quantity of documents a visitor places in a shopping cart until checkout.

TABLE 2

Cookies	www.usitc.gov	dockets.usitc.gov	info.usitc.gov	dataweb.usitc.gov	Library Catalog	radiator.usitc.gov
Session Cookies	X	X	X	X	X	
Persistent Cookie						

Voluntary Submission of Personally Identifying Information

In certain transactions with the public, the Commission collects personally identifiable information where the visitor voluntarily provides the information. For instance in an email to the Commission, the individual may provide personally identifying information. We found no areas where the Commission collects personally identifying information involuntarily or through the use of third parties or contractors.

On two servers, <http://dataweb.usitc.gov> and <http://dockets.usitc.gov>, the Commission provides web forms which permit visitors to voluntarily submit personally identifying information.

We found in regards to <http://dataweb.usitc.gov>, visitors are required to register prior to being granted access to some areas on the site. Data collected during registration includes name, email, phone, agency or firm type, and agency name. Pursuant to the Paperwork Reduction Act, the Office of Management and Budget has approved the collection of this information. (OMB No: 3117-0190 Exp Date 1/31/2003). The Commission currently tracks every login, query and list made to evaluate the impact of visitor activity on system resources. This tracking is performed to improve service as well as for the purpose of evaluating more expansive offerings in this area. This information is archived by Commission computers and some data, not including personally identifying information, have been made available under FOIA.

In regards to <http://dockets.usitc.gov>, visitors who request copies of documents are requested to provide their name, phone number, address, delivery method and method of payment. This information is then provided to a contractor who processes the order. This information is destroyed after an order is processed.

Privacy Statement

We reviewed the adequacy of the Commission's Privacy Statement located at <http://www.usitc.gov/privacy.htm>. In general, the statement is adequate but should be more specific as to give the public more guidance as to what is automatically being recorded by the Commission's Internet server log files (see Table 1) and what information is being collected via web forms and emails and the disposition of that information.

In accordance with OMB Guidance (M-99-18), links to the Privacy Statement should exist at major entry points to agency web sites. Currently, sites such as, <http://info.usitc.gov/337> and <http://radiator.ustic.gov>, have no link to the Privacy Statement.

Additionally, the Privacy Statement provides no notice of the use of session cookies.

We requested that the Commission address these issues in its Privacy Statement and the Commission has agreed to do so.

V. CONCLUSIONS

Based on our findings, we conclude that currently the Commission is collecting personally identifying information via its Internet servers only to the extent necessary to perform adequate analysis of site performance, maintain security and transact business with the general public. We made a recommendation as to the content of the Commission's Privacy Statement and that recommendation was accepted.