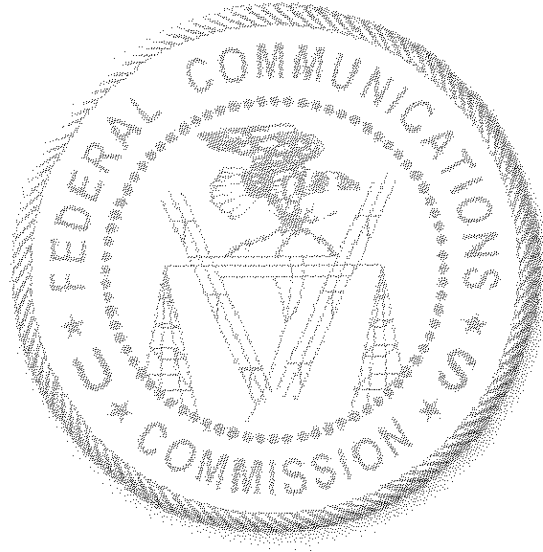


Federal Communications Commission

Office of the Managing Director



Privacy Impact Assessment¹ (PIA) for the Informal Complaints and Inquiries

June 28, 2007

Information System: Informal Complaints and Inquiries
FCC Bureau/Office: Consumer and Governmental Affairs Bureau (CGB)
Division: Consumer Inquiries and Complaints Division (CICD)

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¹ This questionnaire is used to analyze the impacts on the privacy and security of the personally identifiable information (PII) that is being maintained in these records and files.

The *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, requires Federal agencies to take special measures to protect personal information about individuals when the agencies collect, maintain, and use such personal information.

Having established through the **Privacy Threshold Assessment** that this information system contains information about individuals, *e.g.*, personally identifiable information (PII), it is important that when the FCC makes changes to such an information system, the FCC then analyzes:

- (a) What changes are being made to the information that the system presently collects and maintains; and/or
- (b) What new information will be collected and maintained to determine the continuing impact(s) on the privacy of the individuals.

The Privacy Impact Assessment template's purpose is to help the bureau/office to evaluate the changes in the information in the system and to make the appropriate determination(s) about how to treat this information, as required by the Privacy Act's regulations.

Section 1.0 Information System's Contents:

1.1 Status of the Information System:

- New information system—Development date:
- Revised or upgraded information system—Revision or upgrade date: 2006

If this system is being revised—what will be done with the newly derived information:

- Placed in existing information system—Implementation Date: 2006
- Placed in new auxiliary/ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

The Consumer Inquiries and Complaints Division (CICD) of the Consumer and Governmental Affairs Bureau (CGB) has updated FCC/CGB-1, "Informal Complaints and Inquiries," System of Records Notice (SORN) databases. Information maintained under this SORN is now stored in both the OSCAR and CIMS operating systems.

1.2 Has a Privacy Threshold Assessment been done?

- Yes
Date:
- No

If a Privacy Threshold Assessment has not been done, please explain why not:

FCC/CGB-1, "Informal Complaints and Inquiries," SORN pre-dates the implementation of the Privacy Impact Assessment requirements, as required by OMB Memorandum M-03-22 (September 22, 2003).

If the Privacy Threshold Assessment (PTA) has been completed, please skip to Question 1.15

1.3 Has this information system, which contains information about individuals, *e.g.*, personally identifiable information (PII), existed under another name, *e.g.*, has the name been changed or modified?

- Yes
- No

If yes, please explain your response:

This SORN was previously titled FCC/CIB-1, "Informal Complaints and Inquiries." The name has been changed to reflect the CGB's name change.

1.4 Has this information system undergone a "substantive change" in the system's format or operating system?

- Yes
 No

If yes, please explain your response:

FCC/CGB-1, "Informal Complaints and Inquiries," SORN now includes both the OSCAR and CIMS operating systems.

If there have been no such changes, please skip to Question 1.7.

1.5 Has the medium in which the information system stores the records or data in the system changed from paper files to electronic medium (computer database); or from one electronic information system to another, *i.e.*, from one database, operating system, or software program, *etc.*?

- Yes
 No

If yes, please explain your response:

Information that is covered by FCC/CGB-1, "Informal Complaints and Inquiries," SORN is stored and maintained in both the OSCAR and CIMS operating systems. The CGB receives informal complaints in a variety of media, including USPS mail, e-mails, faxes, telephone calls (that are subsequently transcribed by CGB), web portal transmissions via www.fcc.gov. Once the informal complaints and inquiries are coded and entered into the CGB databases, the paper copies, *etc.* are stored in locked storage rooms.

1.6 Has this information system operated as part of another information system or was it linked to another information system:

- Yes
 No

Please explain your response:

Both the CIMS and OSCAR databases are part of the FCC's "in house" information systems network. There are no links to other, external information systems or databases.

If the information system is not part of, nor linked to another information system, please skip to Question 1.8

1.7 If so, was it operated by another bureau/office or transferred from another Federal agency to the FCC?

- Yes
 No

Please explain your response:

1.8 What information is the system collecting, analyzing, managing, storing, transferring, *etc.*:

Information about FCC Employees:

- No FCC employee information
- FCC employee's name
- Other names used, *i.e.*, maiden name, *etc.*
- SSN
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Finger prints
 - Voice prints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s)
- Personal e-mail address(es)
- FCC personal employment records
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- FCC badge number (employee ID)
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information, please specify:

Information about FCC Contractors:

- No FCC contractor information
- Contractor's name
- Other names used, *i.e.*, maiden names, *etc.*

- SSN
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Finger prints
 - Voice prints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Emergency contact data
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Personal e-mail address(es)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- FCC Contractor badge number (Contractor ID)
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information, please specify:

Information about FCC Volunteers, Visitors, Customers, and other Individuals:

- Not applicable
- Individual's name: Individuals who submit or file informal complaints and/or inquiries with the FCC.
- Other name(s) used, *i.e.*, maiden name, *etc.*
- SSN
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints

- Voiceprints
- Retina scans/prints
- Photographs
- Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Emergency contact data:
- Individual's home and/or personal telephone/cell phone/fax/pager account number(s):
- Consumer/customer telephone/cell phone account number(s)
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Personal e-mail address(es)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information, please specify: Consumer complaint information regarding telephone common carriers and other telecommunications related complaints, which include program providers, *e.g.*, broadcast, satellite, wireless, *etc.* disability rights related services, indecency, obscenity, and profanity complaints, *etc.*

Information about Business Customers (usually not considered "personal information"):

- Not applicable
- Name of business contact/firm representative
- Business/corporate purpose(s)
- Job description
- Professional affiliations
- Partial SSN
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)

- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Credit card number(s)
- Bank account(s)
- Other information: Business complaint information regarding telephone common carriers and other telecommunications related complaints, which include program providers, *e.g.*, broadcast, satellite, wireless, *etc.* disability right related services, indecency, obscenity, and profanity complaints, *etc.*

1.9 What are the sources for the information that you are collecting:

- Personal information from FCC employees:
- Personal information from FCC contractors:
- Personal information from non-FCC Individuals and/or households: Consumers submitting telecommunications services complaints, *etc.*
- Non-personal information from businesses and other for-profit entities: Businesses submitting telecommunications services complaints, *etc.*
- Non-personal information from institutions and other non-profit entities: Institutions and non-profit organizations submitting telecommunications services complaints, *etc.*
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources:

1.10 Will the information system obtain, use, store, analyze, *etc.* information about individuals *e.g.* personally identifiable information (PII), from other information systems, including both FCC and non-FCC information systems?

- Yes
- No

Please explain your response:

The Informal Complaints and Inquiries database includes only PII submitted to the FCC by consumers.

If the information system does not use any PII from other information systems, please skip to Question 1.15

1.11 If the information system uses information about individuals from other information systems, what information will be used?

- SSN
- Other names used
- Citizenship
- Biometric data
 - Finger prints
 - Voice prints
 - Retina scan/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data

- Marital status
- Spousal information
- Miscellaneous family information, please specify:
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s)
- Personal e-mail address(es)
- Non-FCC personal employment records
- Non-FCC government badge number (employee ID)
- Law enforcement data
- Military history
- National security data
- Communications protected by legal privileges
- Financial history
- Foreign countries visited
- Background investigation history
- Digital signature
- Consumer/customer name
- Consumer/customer SSN
- Consumer/customer address
- Consumer/customer birthday/age
- Consumer/customer telephone number(s)
- Consumer/customer cell phone number(s)
- Consumer/customer telephone/cell phone/fax account number(s)
- Other information:

Information about Business Customers (usually not considered "personal information"):

- Not applicable
- Name of business contact/firm representative
- Business/corporate purpose(s)
- Job description
- Professional affiliations
- Partial SSN
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business e-mail address(es)
- Race/Ethnicity
- Gender
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits

- Commercially obtained credit history data
- Commercially obtained buying habits
- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information:

1.12 Will this information system derive new information, records, or data, or create previously unavailable information, records, or data, through aggregation or consolidation from the information that will now be collected via this link to the other system, including information, records, or data, that is being shared or transferred from the other information system(s)?

- Yes
- No

Please explain your response:

1.13 Can the information, whether it is: (a) in the information system, (b) in a linked information system, and/or (c) transferred from another system, be retrieved by a name or a "unique identifier" linked to an individual, e.g., SSN, name, home telephone number, fingerprint, voice print, etc.?

- Yes
- No

Please explain your response:

1.14 Will the new information include personal information about individuals, e.g., personally identifiable information (PII), be included in the individual's records or be used to make a determination about an individual?

- Yes
- No

Please explain your response:

1.15 Under the *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, Federal agencies are required to have a System of Records Notice (SORN) for the information system like this one, which contains information about individuals, e.g., "personally identifiable information" (PII).

A System of Records Notice (SORN) is a description of how the information system will collect, maintain, store, and use the personally identifiable information (PII).

Is there a SORN that already covers this PII in this information system?

- Yes
- No

If yes, what is this System of Records Notice (SORN): FCC/CGB-1, "Informal Complaints and Inquiries," was previously titled: FCC/CIB-1, "Informal Complaints and Inquiries," 66 FR 51955 (October 11, 2001).

Please provide the citation that was published in the *Federal Register* for the SORN:

If a SORN already covers this PII, please skip to **Section 2.0 System of Records Notice (SORN) Update** to address any changes to this SORN.

If a system of records notice (SORN) does not presently cover the information about individuals in this system, then it is necessary to determine whether a new FCC system of records notice must be created for the information.

- 1.16 If this information system is not covered by a system of records notice (SORN), does the information system exist by itself, or does it now, or did it previously exist as a component or subset of another SORN?

- Yes
 No

If yes, please explain what has occurred:

What is the System of Records Notice (SORN) of which it is currently or previously a component or subset:

Please also provide the citation that was published in the *Federal Register* for the SORN:

- 1.17 What are the purposes or functions that make it necessary to create a new system of records notice (SORN) for this information system, *e.g.*, why is the information being collected?

- Yes
 No

If yes, please explain what has occurred:

- 1.18 Where is this information for the system of records notice (SORN) located?

- 1.19 Is the use of the information both relevant and necessary to the purposes for which the information system is designed, *e.g.*, is the SORN only collecting and using information for the specific purposes for which the SORN was designed so that there is no “extraneous” information included in the database(s) or paper files?

- Yes
 No

Please explain your response:

If yes, please skip to Question 1.21.

- 1.20 If not, why or for what reasons is the information being collected?

- 1.21 Is the information covered under a Security Classification as determined by the FCC Security Officer?
 Yes
 No

Please explain your response:

- 1.22 What is the legal authority that authorizes the development of the information system and the information/data collection?

- 1.23 In what instances would the information system's administrator/manager/developer permit disclosure to those groups outside the FCC for whom the information was not initially intended.

Such disclosures, which are referred to as "Routine Uses," are those instances that permit the FCC to disclose information from a SORN to specific "third parties." These disclosures may be for the following reasons:

(check all that are applicable)

- Adjudication and litigation:
- Committee communications:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations (NTEU):
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA, *etc.*:
- Breach of Federal data:
- Other "third party" disclosures:

- 1.24 Will the information be disclosed to consumer reporting agencies?
 Yes
 No

Please explain your response:

- 1.25 What are the policies for the maintenance and secure storage of the information?

- 1.26 How is information in this system retrieved?

- 1.27 What policies and/or guidelines are in place on how long the bureau/office will retain the information?
- 1.28 Once the information is obsolete or out-of-date, what policies and procedures have the system's managers/owners established for the destruction/purging of the data?
- 1.29 Have the records retention and disposition schedule(s) been issued or approved by the National Archives and Records Administration (NARA)?
- Yes
 No

Please explain your response:

If a NARA records retention and disposition schedule has been approved for this System of Records Notice (SORN), please skip to **Section 2.0 System of Records Notice (SORN) Update:**

- 1.30 If there is no NARA approved records retention and disposal schedule, has there been any coordination with the Performance Evaluation and Records Management Branch (PERM) or the Records Officer?
- Yes
 No

Please explain your response:

If this is a new System of Records Notice (SORN), please skip to **Section 3.0 Development, Management, and Deployment and/or Sharing of the Information:**

Section 2.0 System of Records Notice (SORN) Update:

If a System of Records Notice (SORN) currently covers the information, please provide information to update and/or revise the SORN:

- 2.1 Have there been any changes to the Security Classification for the information covered by the system of records notice (SORN) from what was originally determined by the FCC Security Officer?
- Yes
 No

Please explain your response:

FCC/CGB-1, "Informal Complaints and Inquiries" SORN has not been assigned a Security Classification.

- 2.2 Have there been any changes to the location of the information covered by the system of records notice (SORN)?
- Yes
 No

Please explain your response:

FCC/CGB-1, "Informal Complaints and Inquiries" SORN is maintained by the Consumer Inquiries and Complaints Division (CICD) of the Consumer and Governmental Affairs Bureau (CGB).

- 2.3 Have there been any changes to the categories of individuals covered by the system of records notice (SORN)?

- Yes
 No

Please explain your response:

The categories of individuals in FCC/CGB-1, "Informal Complaints and Inquiries," SORN remain the same.

- 2.4 Have there been any changes to the categories of records, *e.g.*, types of information (or records) that the system of records notice (SORN) collects, maintains, and uses?

- Yes
 No

Please explain your response:

The categories of records in FCC/CGB-1, "Informal Complaints and Inquiries," SORN have been expanded to include submissions that individuals make using fax, voice (telephone calls), Internet e-mail, and the FCC web portal at: www.fcc.gov.

- 2.5 Have there been any changes to the legal authority under which the FCC collects and maintains the information covered by the system of records notice (SORN)?

- Yes
 No

Please explain your response:

The legal authority under which FCC/CGB-1, "Informal Complaints and Inquiries," SORN collects, maintains, and uses the personally identifiable information (PII), includes Sections 151, 154, 206, 208, 225, 226, 227, 228, 255, 258, 301, 303, 309(e), 312, 362, 364, 386, 507 of the Communications Act of 1934, as amended, 47 U.S.C. 151, 154, 206, 208, 225, 226, 227, 228, 255, 258, 301, 303, 309(e), 312, 362, 364, 386, 507; Sections 504 and 508 of the Rehabilitation Act, 29 U.S.C. 794; and 47 CFR 1.711 *et seq.*, 6.15 *et seq.*, 7.15 *et seq.*, and 64.604.

- 2.6 Have there been any changes to the purposes for collecting, maintaining, and using the information covered by the system of records notice (SORN)?

- Yes
 No

Please explain your response:

The purposes for collecting, maintaining, and using the information in FCC/CGB-1, "Informal Complaints and Inquiries," SORN are to handle and process informal complaints received from individuals, groups, and other entities. Records in this system are available for public inspection after redaction of personal information that could identify the complainant or correspondent, *i.e.*, name, address and/or home telephone and/or fax number and e-mail address.

2.7 Have there been any changes to the Routine Uses under which disclosures are permitted to “third parties” as noted in the system of records notice (SORN)?

- Yes
- No

If the Routine Uses have changed, what changes were made:
(check all that apply and explain the changes)

- Not applicable—there have been no changes to the Routine Uses
- Adjudication and litigation:
- Committee communications:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA:
- Breach of Federal data: Required by OMB Memorandum M-07-16 (May 22, 2007).
- Others Routine Use disclosures not listed above: Informal complaints filed against common carriers, programming providers, *i.e.*, broadcast, cable, and/or satellite services, *etc.*

2.8 Have there been any changes to whether the FCC will permit the information covered by the system of records notice (SORN) can be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

The FCC does not permit information in FCC/CGB-1, "Informal Complaints and Inquiries," SORN to be disclosed to consumer reporting agencies.

2.9 Have there been any changes to the policies and/or guidelines for the storage and maintenance of the information covered by this system of records notice (SORN)?

- Yes
- No

Please explain your response:

The Consumer and Governmental Affairs Bureau staff logs all consumer informal complaints and inquiries that it receives into its CIMS and OSCAR electronic databases. These informal complaint and inquiry submissions are then given an identification code number for future reference when the CGB acts on the submission. The submissions are given this identification code to eliminate any confusion that could occur when consumers file duplicate submissions in different media. Once the log in and

coding processes are completed, the submission is moved to a locked storage room for safekeeping as required by the National Archives and Records Administration (NARA) Schedule 1.

- 2.10 Have there been any changes to how the information covered by the system of records notice (SORN) is retrieved or otherwise accessed?

- Yes
 No

Please explain your response:

Information in FCC/CGB-1, "Informal Complaints and Inquiries," SORN is retrieved by the individual's name, entity name, licensee, applicant, or unlicensed individual, call sign, file number, or subject name.

- 2.11 Have there been any changes to the safeguards that the system manager has in place to protect unauthorized access to the information covered by the system of records notice (SORN)?

- Yes
 No

Please explain your response:

Electronic records that emanate for these informal complaint and inquiry submissions, which are covered by FCC/CGB-1, "Informal Complaints and Inquiries," SORN, are maintained in the CIMS and OSCAR network computer databases, which is secured through controlled access and passwords restricted to the FCC employee or contractor working at the FCC. In addition, as an added security measure, the staff in the Consumer and Governmental Affairs Bureau, Enforcement Bureau, and other FCC bureaus and offices who are assigned responsibility for resolution of these records receive a "license" that allows them access to these records and tracks their use of the records to prevent their inadvertent loss. No FCC staff without a license may have access to these records.

Please note that you must also provide an update of the current protections, safeguard, and other security measures that are in place in this SORN in **Section 5.0 Safety and Security Requirements:**

- 2.12 Have there been any changes to the records retention and disposition schedule for the information covered by the system of records notice (SORN)? If so, has the system manager worked with the Performance Evaluation and Records Management (PERM) staff to insure that this revised schedule been approved by the National Archives and Records Administration (NARA)?

- Yes
 No

Please explain your response:

The PERM staff has reviewed this SORN and determined that the SORN meets the terms and conditions of the NARA General Records Schedule 1. The records in this SORN are limited to electronic data, paper files, and audio files, *e.g.*, telephone call records.

Section 3.0 Development, Management, and Deployment and/or Sharing of the Information:

- 3.1 Who will develop the information system(s) covered by this system of records notice (SORN)?

- Developed wholly by FCC staff employees:
 Developed wholly by FCC contractors:
 Developed jointly by FCC employees and contractors:
 Developed offsite primarily by non-FCC staff:

- COTS (commercial-off-the-shelf software) package:
- Other development, management, and deployment/sharing information arrangements:

3.2 Where will the information system be hosted?

- FCC Headquarters
- Gettysburg
- San Diego
- Colorado
- New York
- Columbia Lab
- Chicago
- Other information, please specify:

3.3 Who will be the primary manager(s) of the information system who will be responsible for assuring access to, proper use of, and protecting the security and integrity of the information?
(Check all that apply and provide a brief explanation)

- FCC staff in this bureau/office exclusively: The Consumer and Governmental Affairs (CGB) staff has responsibility for access and proper use of the information.
- FCC staff in other bureaus/offices: Administrative staff at the FCC's Gettysburg facilities will have access.
- Information system administrator/Information system developers: Information technology (IT) staff.
- Contractors:
- Other information system developers, *etc*:

3.4 What are the FCC's policies and procedures that the information system administrators and managers use to determine who gets access to the information in the system's files and/or database(s)?

The CGB staff and those staff in the FCC's Enforcement Bureau (EB) primarily have responsibility for resolution of these informal complaint and inquiry submission. In addition, other FCC bureaus and offices may at times be involved in the resolution process. Thus, all staff who are involved in the resolution process will have access to all the information necessary to resolve these consumer complaints and to proceed with any enforcement action(s) as necessary. Nonetheless, as an added security measure, the staff in the Consumer and Governmental Affairs Bureau, Enforcement Bureau, and the other FCC bureaus and offices who are assigned responsibility for resolution of these records receive a "license" that allows them access to these records and tracks their use of the records to prevent their inadvertent loss. No FCC staff without a license may have access to these records.

3.5 How much access will users have to data in the information system(s)?

- Access to all data:
- Restricted access to data, as determined by the information system manager, administrator, and/or developer: Access to the information is limited to those FCC employees and contractors in CGB and EB who are handling the particular consumer complaint(s).
- Other access policy:

3.6 Based on the Commission policies and procedures, which user group(s) may have access to the information at the FCC:
(Check all that apply and provide a brief explanation)

- Information system managers: FCC staff in the Consumer and Governmental Affairs and Enforcement Bureaus who have received a "license" to access the information.
- Information system administrators: The contractors who manage the IT systems that hold the information.
- Information system developers: IT Contractors working at the FCC may have access to the information as required to manage the IT operation systems, *e.g.*, OSCAR and CIMS, provided that they have received a "license." to access the information.
- FCC staff in this bureau/office:
- FCC staff in other bureaus/offices:
- FCC staff in other bureaus/offices in FCC field offices: Gettysburg may have access to the information to the information in OSCAR and CIMS, provided that they have received a "license" to access the information.
- Contractors: Contractors (other than IT staff) working at the FCC may have access to the information in OSCAR and CIMS, provided that they have received a "license" to access the information.
- Other Federal agencies:
- State and/or local agencies:
- Businesses, institutions, and other groups, please specify which group(s):
- International agencies:
- Individuals/general public:
- Other groups: The FCC sends these informal complaint and inquiry submissions stored in the CIMS and OSCAR databases, with the PII information redacted, to telecommunications carriers, *e.g.*, common carriers, and program providers, *e.g.*, cable and satellite video programming operators, *etc.*, as necessary to resolve the consumer's complaint.

3.7 If contractors are part of the staff in the FCC who collect, maintain, and access the information, does the IT supervisory staff ensure that contractors adhere fully to the Privacy Act provisions, as required under subsection (m) of the Privacy Act, as amended, 5 U.S.C. 552a(m)?

- Yes
- No

Please explain your response:

The FCC's Information Technology (IT) supervisory staff provide periodic privacy training to the contractors as required by OMB .

3.8 Has the Office of the General Counsel (OGC) signed off on any Section M contract(s) for any contractors who work with the information system covered by this system of records notice (SORN)?

- Yes
- No

Please explain your response:

The OGC has signed off on the Consumer and Governmental Affairs Bureau's (CGB) contracts for contractors who have access to these records in CIMS and OSCAR.

3.9 Does the information system covered by this system of records noticed (SORN) transmit/share personal information, *e.g.*, personally identifiable information (PII), between the FCC information technology (IT) network(s) and a public or other non-FCC IT network(s), which are not covered by this Privacy Impact Assessment?

- Yes
 No

Please explain your response:

The CGB staff sends paper copies and electronic data containing the consumer complaints and inquiry data that has been processed, *e.g.*, log into the CGB files and given a code number, and has been stored in the CIMS and OSCAR databases, to telecommunications firms, which are named in the complaint, asking these firms to provide information about the complaint, as part of CGB's process to resolve the complaints. The data may be sent by USPS mail or via electronic submissions (Internet) to the telecommunications firms.

If there is no information sharing or transmission, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

3.10 If the information system covered by this system of records noticed (SORN) transmits/shares personal information between the FCC network and a public or other non-FCC network, which is not covered by this Privacy Impact Assessment, what information is shared/transmitted/disclosed and for what purposes?

As noted above, the CGB may send paper copies and electronic data of these consumer complaints and inquiries via USPS mail and electronic submissions (Internet) to the telecommunications firms named in the complaint and/or inquiry.

3.11 If there is such transmission/sharing of personal information, how is the information secured for transmission—what security measures are used to prevent unauthorized access during transmission, *i.e.*, encryption, *etc.*?

The CGB usually redacts personally identifiable information (PII) prior to sending the complaint, although, in some instances, it is crucial to the resolution of the complaint that the telecommunications firm named in the complaint has this PII so that it may prepare its response.

3.12 If there is sharing or transmission to other information systems, with what other non-FCC organizations, groups, and individuals will the information be shared?
(Check all that apply and provide a brief explanation)

- Other Federal agencies: Federal Trade Commission, Department of Justice, *etc.*
 State, local, or other government agencies: States' attorneys general.
 Businesses: Telecommunications firms.
 Institutions:
 Individuals:
 Other groups:

If there is no "matching agreement," *e.g.*, *Memorandum of Understand (MOU)*, *etc.*, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

3.13 What kind of “matching agreement,” *e.g.*, *Memorandum of Understanding (MOU)*, *etc.*, as defined by 5 U.S.C. 552a(u) of the Privacy Act, as amended, is there to cover the information sharing and/or transferal with the external organizations?

3.14 Is this a new or a renewed matching agreement?

- New matching agreement
- Revised matching agreement

Please explain your response:

3.15 Has the matching agreement been reviewed and approved (or renewed) by the FCC’s Data Integrity Board, which has administrative oversight for all FCC matching agreements?

- Yes
If yes, on what date was the agreement approved:
- No

Please explain your response:

3.17 How is the information that is covered by this system of records notice (SORN) transmitted or disclosed with the external organization(s) under the *MOU* or other “matching agreement?”

3.18 How is the shared information secured by the recipient under the *MOU*, or other “matching agreement?”

Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:

OMB regulations require Federal agencies to insure that the information/data that they collect and use meets the highest possible level of quality and integrity. It is important, therefore, that the information the Commission’s information systems use meets the “benchmark standards” established for the information.

4.1 How will the information that is collected from FCC sources, including FCC employees and contractors, be checked for accuracy and adherence to the Data Quality guidelines?
(Please check all that apply)

- Information is processed and maintained only for the purposes for which it was collected:
- Information is reliable for its intended use(s):
- Information is accurate:
- Information is complete:
- Information is current.
- Not applicable:

Please explain any exceptions or clarifications:

The information covered by FCC/CGB-1, "Informal Complaints and Inquiries," SORN is obtained from individuals, groups, and other entities who have made informal complaints or inquiries, in any format, including but not limited to, paper, fax, telephone, and electronic submissions, *e.g.*, e-mails and

submissions via the FCC's web portal at: www.fcc.gov, comprise the universe of records that the CGB staff stores in the bureau's files cabinets (after log in and coding) and in the OSCAR and CIMS electronic databases. CGB staff does not control the submission of these consumer complaints, which are submitted on a voluntary basis by consumers. There is no FCC-related information, from either FCC employees, volunteers, or contractors, in this information system.

If the Data Quality Guidelines do not apply to the information in this information system, please skip to **Section 5.0 Safety and Security Requirements:**

- 4.2 Is any information collected from non-FCC sources; if so, how will the information sources be checked for accuracy and adherence to the Data Quality guidelines?
(Please check all that apply and provide an explanation)
- Yes, information is collected from non-FCC sources: The FCC only uses these informal complaint and inquiry submissions that individual consumers and businesses submit to resolve these complaint issues. Once the complaint, inquiry, etc., has been resolved, the information is stored and then destroyed as required by the NARA's Schedule 1 governing document retention and disposal for this type of information. onsumer complaints and responses from telecommunications firms.
 - Information is processed and maintained only for the purposes for which it was collected: The FCC only uses these informal complaint and inquiry submissions that individual consumers and businesses submit to resolve these complaint issues. Once the complaint, inquiry, etc., has been resolved, the information is stored and then destroyed as required by the NARA's Schedule 1 governing document retention and disposal for this type of information.
 - Information is reliable for its intended use(s): This is predicated upon the telecommunications' firms ability to verify that the complaint is reliable.
 - Information is accurate: This is predicated upon the telecommunications' firms ability to verify that the complaint is accurate.
 - Information is complete: The CGB will send the complainant a letter requesting "more information" if the CGB staff determines that the complainant's submission is "incomplete."
 - Information is current: The CGB will determine, with guidance from the Office of the General Counsel, if the complaint submitted by an individual consumer or business falls within the acceptable timeframe, *e.g.*, the "statute of limitations," for responding to these informal complaints or inquiries.
 - No information comes from non-FCC sources:
- 4.3 If the information that is covered by this system of records notice (SORN) is being aggregated or consolidated, what controls are in place to insure that the information is relevant, accurate, and complete?
- Not applicable.
- Please explain your response:
- 4.4. What policies and procedures do the information system's administrators and managers use to insure that the information adheres to the Data Quality guidelines both when the information is obtained from its sources and when the information is aggregated or consolidated for the use by the bureaus and offices?
- Not applicable.

Please explain your response:

- 4.5 How often are these policies and procedures checked routinely—what type of annual verification schedule has been established?

Not applicable.

Please explain your response:

Section 5.0 Safety and Security Requirements:

- 5.1 How are the records/information/data in the information system covered by this system of records notice (SORN) stored and maintained?

IT database management system (DBMS)

Storage media including diskettes, CDs, CD-ROMs, *etc.*

Electronic tape

Paper files: Letters and other documents that individual consumers and businesses send to the FCC via USPS mail are logged in, coded, and the information is scanned into the CGB's CIMS and OSCAR electronic databases. These paper documents are stored in locked storage rooms as required by the NARA Schedule 1's document retention, storage, and destruction protocol for these types of documents.

Other:

- 5.2 Is the information collected, stored, analyzed, or maintained by this information system available in another form or from another source (other than a "matching agreement" or *MOU*, as noted above)?

Yes

No

Please explain your response:

- 5.3 Is the information system covered by this system of records notice (SORN) part of another FCC information system that collects personally identifiable information (PII)?

Yes

No

Please explain your response:

If this information system is not part of another FCC information system, please skip to Question 5.7.

- 5.4 If the information system (under review here) has personally identifiable information (PII) and is part of another FCC information system, is there a transfer of records/data/information between these two FCC information system(s)?

Yes

No

Please explain your response:

- 5.5 If the information system's personally identifiable information (PII) is part of another FCC information system, does the information system have processes and/or applications that are part of those from the other FCC information systems?

- Yes
 No

Please explain your response:

- 5.6 If either or both such situations, as noted in Questions 5.4 and 5.5 exist, what security controls are there to protect the PII information and to prevent unauthorized access?

- Not applicable.

Please explain your response:

- 5.7 Would the unavailability of this information system prevent the timely performance of FCC operations?

- Yes
 No

Please explain your response:

Part of the FCC's mission is to resolve consumer complaints, thus, submission of these complaints assists the FCC with its duties and responsibilities to address all consumer complaints that may arise as a result of actions taken by telecommunications firms, including programming, subscriber policies, *etc.*

- 5.8 Will the information system include an externally facing information system or portal such as an Internet accessible web application at www.fcc.gov that allows customers/users to access development, production, or internal FCC networks, and which may pose potential risks to the information's security?

- Yes
 No

Please explain your response:

Consumers may submit their informal complaints and inquiries electronically, *e.g.*, e-mails, to the FCC via the FCC's Internet portal at: www.fcc.gov. The FCC's has various security measures to prevent any potential risks to its internal computer network that could occur from consumers and others using the Internet portal.

If there are no externally facing information system portals, please skip to Question 5.11.

- 5.9 If the information is collected via www.fcc.gov from the individuals, how does the information system notify users about the Privacy Notice:

- Link to the FCC's privacy policies for all users: The link directs the individual to the FCC's Privacy Statement.
 Privacy notice displayed on the webpage:

- Privacy notice printed at the form or document: FCC Forms 475, 475-B, and 1088 each have a Privacy Statement.
- Website uses another method to alert users to the Privacy Act Notice, as follows:
- If there is no link or notice, why not:

5.10 If a privacy notice is displayed, which of the following are included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies whether providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specifies the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in any other way.

Please explain your response:

5.11 Will the information system include another customer-facing web site not on www.fcc.gov?

- Yes
- No

Please explain your response:

If the information is not collected via the FCC Intranet for FCC employees and contractors working at the FCC, please skip to Question 5.14.

5.12 If the information system has a customer-facing web site via the FCC Intranet for FCC employees and contractors working at the FCC, does this web site(s) have a Privacy Act Notice and how is it displayed?

- Yes
 - Notice is displayed prominently on this FCC Intranet website:
 - Link is provided to a general FCC Privacy Notice for all users:
 - Privacy Notice is printed at the end of the form or document:
 - Website uses another method to alert users to the Privacy Act Notice:
- No

If there is no Privacy Act Notice, please explain why not:

5.13 If a privacy notice is displayed, which of the following information is included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specifies the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in any other way.

Please explain your response:

If information is not collected via a customer-facing portal on the FCC Internet at www.fcc.gov or the FCC Intranet for FCC employees and contractors, please skip to Question 5.16.

5.14 If information is collected from an individual by fax, e-mail, FCC form(s), or regular mail, how is the privacy notice provided?

- Privacy notice is on the document, *e.g.*, FCC form, *etc.*: FCC Forms 475, 475-B, and 1088 each have a Privacy Statement.
- Privacy notice is displayed on the webpage where the document is located:
- Statement on the document notifies the recipient that they may read the FCC Privacy Notice at www.fcc.gov.
- Website or FCC document uses other method(s) to alert users to the Privacy notice:
- Privacy notice is provided via a recorded message or given verbally by the FCC staff handling telephone calls: CGB staff read a prepared Privacy Statement to callers.
- No link or notice, please explain why not:
- Not applicable, as personally identifiable information (PII) will not be collected.

5.15 If a privacy notice is displayed or provided orally, which of the following information is included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specifies the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in any other way.

Please explain your response:

If there is no access to the information system from outside the FCC, please skip to Question 5.17.

5.16 If consumers may access the information and/or the information system on-line via www.fcc.gov, does it identify ages or is it directed to people under 13 years old?

- Not applicable, as information is not accessed via www.FCC.gov.
- Yes
- No

Please explain your response:

Individual consumers may submit their informal complaints and inquiries via www.FCC.gov. This website does not identify ages nor does it target individuals younger than 13 years old.

5.17 Will the FCC use the newly obtained information or revised information in this information covered by the existing system of records notice (SORN) to make a determination about the individual?

- Yes
- No

Please explain your response:

The data in FCC/CGB-1, "Informal Complaints and Inquiries," SORN is used solely for individual consumers, consumer groups, businesses, and other entities to submit complaints regarding telecommunications carriers and program providers. The CGB then seeks to resolve these consumer complaints by contacting the carriers and program providers and/or forwarding these complaints to the FCC's Enforcement Bureau for their review and action.

5.18 Do individuals have the right to decline to provide personally identifiable information (PII)?

- Yes
 No

Please explain your response:

The FCC prefers that individuals, groups, and other entities who have made informal complaints or inquiries provide only the minimal information necessary to alert the CGB to the circumstances surrounding the complaints and for CGB to resolve it. In fact, the CGB may redact PII to avoid any potential inadvertent disclosure of PII in the course of its investigation of these complaints and inquiries. However, if complainants decline to provide their PII, the FCC may not be able to process the complaint, *e.g.*, the FCC does not process "anonymous complaints."

5.19 Do individuals have the right to consent to particular uses of their personal information?

- Yes
 No

Please explain your response:

Since participation in voluntary, the FCC has attempted to design its forms, *e.g.*, FCC Form 475, 475-B, 1088, *etc.*, to minimize the PII that the Consumer Governmental Affairs Bureau (CGB) requests from individual consumers, consumer groups, and other entities that submit informal complaints or inquiries. The FCC usually contacts the individual consumers in the course of its investigation and resolution of these complaints. The FCC will request that consumers exercise their consent during this resolution process.

If individuals do not have the right to consent to the use of their information, please skip to Question 5.23.

5.20 If individuals have the right to consent to the use of their personal information, how does the individual exercise this right?

5.21 What processes are used to notify and to obtain consent from the individuals whose personal information is being collected?

5.22 What kinds of reports can the information system and/or the information be used to produce on the individuals whose PII data are in the information system covered by the system of records notice (SORN)?

5.23 What safeguards and security measures, including physical and technical access controls, are in place to secure the information and to minimize unauthorized access, use, or dissemination of the information that is stored and maintained in the information system?

(Check all that apply)

- Account name
- Passwords
 - Accounts are locked after a set period of inactivity
 - Passwords have security features to prevent unauthorized disclosure, *e.g.*, "hacking"
 - Accounts are locked after a set number of incorrect attempts
 - One time password token
 - Other security features:
- Firewall
- Virtual private network (VPN)
- Data encryption
- Intrusion detection application (IDS)
- Common access cards (CAC)
- Smart cards
- Biometrics
- Public key infrastructure (PKI)
- Locked file cabinets or fireproof safes:
- Locked rooms, with restricted access when not in use:
- Locked rooms, without restricted access:
- Documents physically marked as "sensitive"
- Guards
 - Identification badges
 - Key cards
 - Cipher locks
 - Closed circuit TV (CCTV): The guards monitor the locked storage rooms where the file cabinets are located.
 - Other: The FCC requires that all of the staff who handle informal complaints and inquiries receive a "license" that gives them access to the information. In addition, the FCC does not grant employees or others a "guest permission," *e.g.*, one-time access to the information.

5.24 Please explain what staff security training and other measures are in place to assure that the security and privacy safeguards are maintained adequately?

All FCC employees and contractors who work with the informal complaints or inquiries paper files and the OSCAR and CIMS databases are required to take periodic training, in addition to the FCC privacy training program.

5.25 How often are security controls reviewed?

- Six months or less
- One year
- Two years
- Three years
- Four years
- Five years
- Other:

- 5.26 How often are personnel (information system administrators, users, information system/information system developers, contractors, *etc.*) who use the information system trained and made aware of their responsibilities for protecting the information?
- There is no training
 - One year
 - Two years
 - Three years
 - Four years
 - Five years
 - Other: The FCC has also inaugurated a Commission-wide Privacy Training program, and all employees and contractors were required to complete the privacy training course in September 2006.

If privacy training is provided, please skip to Question 5.28.

- 5.27 What are the safeguards to insure that there are few opportunities for disclosure, unavailability, modification, and/or damage to the information system covered by this system of records notice (SORN), and/or prevention of timely performance of FCC operations if operational training is not provided?
- 5.28 How often must staff be "re-certified" that they understand the risks when working with personally identifiable information (PII)?
- Less than one year
 - One year
 - Two years
 - Three or more years
 - Other re-certification procedures:
- 5.29 Do the Commission's training and security requirements for this information system that is covered by this system of records notice (SORN) conform to the requirements of the Federal Information Security Management Act (FISMA)?
- Yes
 - No

Please explain your response:

The FCC/CG-1, "Informal Complaints and Inquiries" SORN and its procedures conform to FISMA requirements.

If the Privacy Threshold Assessment was completed recently as part of the information system's evaluation, please skip to Question 5.34.

- 5.30 What is the potential impact on individuals on whom the information is maintained in the information system(s) if unauthorized disclosure or misuse of information occurs?
(check one)
- Results in little or no harm, embarrassment, inconvenience, or unfairness to the individual.
 - Results in moderate harm, embarrassment, inconvenience, or unfairness to the individual.
 - Results in significant harm, embarrassment, inconvenient, or unfairness to the individual.

Please explain your response:

As noted above, the FCC has designed its forms, *e.g.*, FCC Form 475, 475-B, 1088, *etc.*, to minimize the personally identifiable information (PII) that individual consumers and consumer groups are required to provide when they submit their informal complaints and inquiries. This has been done to minimize the potential inadvertent unauthorized disclosure of PII in the course of CGB's resolution of the complaints. Furthermore, these complaints are usually directed at telecommunications carriers and program providers rather than at the individuals who file these complaints.

- 5.31 Is this impact level for the information system(s) covered by this system of records notice (SORN) consistent with the guidelines as determined by the FIPS 199 assessment?

- Yes
 No

Please explain your response:

FCC/CGB-1, "Informal Complaints and Inquiries," SORN has been assigned a "moderate" impact level.

- 5.32 Has a "Certification and Accreditation" (C&A) been completed for the information system(s) covered this system of records notice (SORN)?

- Yes
 No

If yes, please explain your response and give the C&A completion date:

OSCAR and CIMS are both minor applications, and both information systems are undergoing modifications. Their respective C&As are scheduled and will be completed once the modifications are finished.

- 5.33 Has the Chief Information Officer (CIO) and/or the Chief Security Officer (CSO) designated this information system as requiring one or more of the following:

- Independent risk assessment: Computer Security Program (CSP) staff will perform reviews of the management, operational, and technical controls as part of the risk assessment for CIMS and OSCAR.
 Independent security test and evaluation: Computer Security Program (CSP) staff will be performed the risk assessment and security test and evaluation during the Certification and Accreditation (C&A) process.
 Other risk assessment and/or security testing procedures, etc:
 Not applicable:

- 5.34 Is the system using technology in ways that the Commission has not used previously, *i.e.*, Smart Cards, Caller-ID, *etc.*?

- Yes
 No

Please explain your response:

Please explain your response:

- No, this system of records notice includes only FCC employees and/or contractors, which exempts it from the PRA. Please skip to **Section 7.0 Correction and Redress**:

6.2 If the website requests information, such as the information necessary to complete an FCC form, license, authorization, *etc.*, has the information collection covered by this system of records notice (SORN) been identified for possible inclusion under the FCC's Paperwork Reduction Act (PRA) requirements?

- Yes
 No

Please explain your response:

The FCC forms, including FCC Forms 475, 475-B, 1088, *etc.*, that consumers use to submit their informal complaints and inquiries have been reviewed and approved by the Office of Management and Budget under the PRA requirements.

If there are no PRA information collections associated with the information system or its applications, please skip to **Section 7.0 Correction and Redress**:

6.3 If yes, what PRA information collections covered by this system of records notice (SORN) are associated with this database please list the OMB Control Number, Title of the collection, Form number(s) as applicable, and Expiration date:

3060-0874, FCC Consumer Complaint Forms, FCC Form 475 and 475-B; Expiration date: 11/30/2008.
3060-1088, FCC Form 1088, Rules and Regulations Implementing the Telephone Consumer Protection Act (TCPA) of 1991, *Report and Order and Third Order on Reconsideration*, CG Docket No. 05-338, FCC 06-42; Expiration date: 03/31/2010.

6.4 If there are any FCC forms associated with the information system(s) covered by this system of records notice (SORN), do the forms carry the Privacy Act notice?

- Yes

FCC Form Number(s) and Title(s): FCC Form 475, FCC Form 475-B, and FCC Form 1088

- No
 Not applicable—the information collection does not include any forms.

6.5 Have the system managers contacted the Performance Evaluation and Records Management (PERM) staff to coordinate PRA requirements and submission of the information collection to the Office of Management and Budget?

- Yes
 No

Please explain your response:

Section 7.0 Correction and Redress:

7.1 Are the procedures for individuals wishing to inquire whether this system of records notice (SORN) contains information about them consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals who file informal complaints and inquiries should address their inquiries to the system manager of this SORN, as noted in the SORN.

7.2 Are the procedures for individuals to gain access to their own records/information/data in this information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals seeking access to the information about them in the FCC/CGB-1, "Informal Complaints and Inquiries," SORN should contact the system manager or the Assistant Managing Director in the Consumer and Governmental Affairs Bureau, which is consistent FCC policies and rules under 47 CFR §§ 0.554 – 0.555.

7.3 Are the procedures for individuals seeking to correct or to amend records/information/data about them in the information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals seeking to correct or to amend information about them in the FCC/CGB-1, "Informal Complaints and Inquiries," SORN should contact the system manager in the Human Resources Consumer and Governmental Affairs Bureau, which is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555.

7.4 Does the FCC provide any redress to amend or correct information about an individual in this system of records notice (SORN), and if so, what alternatives are available to the individual, and are these consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

- Yes
- No

Please explain your response:

Individuals seeking any redress to amend or correct information about them in the FCC/CGB-1, "Informal Complaints and Inquiries," SORN should contact the system manager in the Human Resources Consumer and Governmental Affairs Bureau, which is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555.

If this is a new system of records notice (SORN), please skip to Question 7.6.

7.5 Have the sources for the categories of records in the information system(s) covered by this system of records notice (SORN) changed?

- Yes
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

7.6 Does this system of records notice (SORN) claim any exemptions to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about them in this SORN, and if so, are these exemptions consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.561?

- Yes
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

The FCC/CGB-1, "Informal Complaints and Inquiries," SORN is been revised to update information about the two databases, OSCAR and CIMS, which store the electronic records, *e.g.*, e-mails (Internet), faxes, voice (telephone calls), and submissions via the FCC's web portal at: www.fcc.gov, which individual consumers and groups have sent to the FCC regarding informal complaints and inquiries. Individuals should contact the system manager in the Consumer and Governmental Affairs Bureau Bureau. This SORN contains no exemptions to the notification, access, and correction and/or amendment procedures as they apply to individuals seeking information about them in this SORN.

7.7 What processes are in place to monitor and to respond to privacy and/or security incidents? Please specify what is changing if this is an existing system of records notice (SORN) that is being updated or revised?

The Consumer and Governmental Affairs Bureau Bureau staff has posted notices that the information in this SORN's paper files and electronic databases is "non public for internal use only." The CGB also issues reminders periodically to those granted access to the information that they are to keep the information confidential and to safeguard any printed materials.

7.8 How often is the system audited to ensure compliance with FCC and OMB regulations and to determine new needs?

- Six months or less
 One year
 Two years
 Three years
 Four years
 Five years

Other audit scheduling procedure(s):

Section 8.0 Consumer Satisfaction:

8.1 Is there a customer satisfaction survey included as part of the public access to the information covered by this system of records notice (SORN)?

- Yes
- No
- Not applicable

Please explain your response:

If there are no Consumer Satisfaction requirements, please skip to **Section 9.0 Risk Assessment and Mitigation:**

8.2 Have any potential Paperwork Reduction Act (PRA) issues been addressed prior to implementation of the customer satisfaction survey?

- Yes
- No

Please explain your response:

8.3 If there are PRA issues, were these issues addressed in the PRA component of this PIA template?

- Yes
- No

Please explain your response:

Section 9.0 Risk Assessment and Mitigation:

9.1 What are the potential privacy risks for the information covered by this system of records notice (SORN), and what practices and procedures have you adopted to minimize them?

Risks:

- a. FCC employees and contractors inadvertently disclosing personally identifiable information about individual consumers who file consumer complaints and inquiries.
- b. Personally Identifiable Information (PII) is stored in this information system

Mitigating factors:

- a. Privacy notices, privacy training, and periodic reminders that the PII contained in the consumer's complaints or inquiries is not to be disclosed without authorization.
- b. Information is protected on PCs requiring login's and access rights; and there is little impact to individual privacy since the PII that is stored in this system is "low security" and participating in the SORN is purely voluntary.

c. Information in the SORN's database is stored in the CIMS and OSCAR electronic databases that are part of the FCC's network computer system.

d. The CGB staff receives individual consumer and group informal complaints and inquiries at FCC in a variety of media, including USPS mail, fax, e-mail (Internet), FCC web portal at www.fcc.gov, etc.

c. CGB has instituted password protection for the CIMS and OSCAR electronic databases.

d. CGB requires that all FCC staff and contractors who handle these individual consumer and group complaints and inquiries must have a "license" to work with the information that the FCC receives in all media formats, including USPS mail, fax, e-mail (Internet), FCC web portal at www.fcc.gov, etc. This license is also required for access to the storage rooms where these records are kept pending destruction.

9.2 What deficiencies did the bureau/office find in its procedures for evaluating the information system(s) covered by this system of records notice (SORN) and what remedies did the bureau/office enact following this Privacy Impact Assessment (PIA)?

Deficiencies:

a. Failure to lock file cabinets and to lock storage rooms where these cabinets are located when they are not in use.

b.
c.

Remedies:

a. CGB staff have implemented a policy and placed signs in conspicuous places to remind the staff using these records that they must check to insure that file cabinets are locked and rooms containing these cabinets are also locked when they were not in use.

b.
c.

9.3 What is the projected production/implementation date for the database(s):

Initial implementation: 2001
Secondary implementation: 2006
Tertiary implementation:
Other implementation:

9.4 Are there any ancillary and/or auxiliary information system(s) applications linked to this information system that is covered by this system of records notice (SORN), which may also require a Privacy Impact Assessment (PIA)?

Yes
 No

If so, please state the application(s), if a Privacy Impact Assessment (PIA) has been done, and the completion date for the PIA:

Certification:

I as the information system owner or custodian will ensure that the FCC's information security and privacy policies, guidelines, and procedures are followed in the development, integration, operation, and maintenance of this information system.

William Cline 06-28-07
[Information System Owner or Custodian, Title, and Date (MM/DD/YYYY)]

Arthur D. Scutkins 06/28/07
[Information System Owner or Custodian, Title, and Date (MM/DD/YYYY)]

Leslie F. Smith 06/28/2007
[Privacy Analyst and Date (MM/DD/YYYY)]