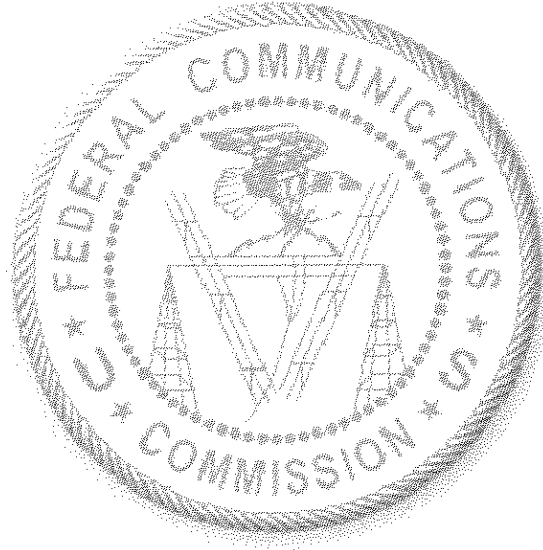


Federal Communications Commission
Office of the Managing Director



**Privacy Threshold Analysis (PTA)¹ for the
Cadapult Space Management System**

March 27, 2007

Information System: Cadapult Space Management System
FCC Bureau/Office: Office of the Managing Director (OMD)
Division: Administrative Operations–Space Management Center (SMC)

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¹ This form is used to determine whether a Privacy Impact Assessment is required.

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.

The E-Government Act of 2002 defines an information technology and/or system by reference to the definition sections of Titles 40 and 44 of the United States Code (U.S.C.). The following summarize these definitions:

- “Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. *See* 40 U.S.C. 11101(6).
- “Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. *See* 44 U.S.C. 3502(8).

It is important, therefore, that when the FCC develops or makes changes to its information systems, the FCC then analyzes what information the system will collect and maintain to determine whether there are any privacy issues.

The purpose of the **Privacy Threshold Assessment** is to help the FCC’s bureaus/offices evaluate the information, data, and/or records in the information system and make the appropriate determination about how to treat the information, as required by the Privacy Act’s regulations.

Thus, the Privacy Threshold Assessment helps the bureaus and offices to determine if the data in the information system include information about individuals, *e.g.*, personally identifiable information (PII), which will require a **Privacy Impact Assessment** to be conducted.

Section 1.0 Information System’s Status:

1.1 Status of the Information System:

- New information system—Development date [mm/dd/yyyy]:
- Revised or upgraded information system—Revision or upgrade date [mm/dd/yyyy]: Updated FALL 2005

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

- Placed in existing information system—Implementation Date [mm/dd/yyyy]: Fall 2005
- Placed in new auxiliary /ancillary information system—Date [mm/dd/yyyy]:
- Other use(s)—Implementation Date [mm/dd/yyyy]:

Please explain your response:

The Space Management Center updated the Cadapult Space Management System database in the Fall 2005.

1.2 Has this information system existed previously or been operated under any other software program, information system medium, *i.e.*, electronic or paper files, and/or other format?

- Yes
- No

Please explain your response:

The Cadapult Space Management System (CSMS) is an information system that has existed in various forms since it was created in 1998. After 09/11/2001, the Space Management Center staff upgraded the information system's software.

1.3 Has this information system existed under another name, or has the name been changed or modified?

- Yes
- No

Please explain your response:

1.4 Why is the information being collected, *e.g.*, what are the information system's purposes, intended uses, and/or functions:

The information in the Cadapult Space Management System (CSMS) is used to allocate the offices, workstations, and facility work spaces to FCC employees and contractors following the FCC/NTEU (National Treasury Employees Union) space assignment policy. In the event of an emergency, the SMC will have to pull information from this database to create the space requirements for alternative work location(s) in other buildings to be used to relocate FCC employees and/or contractors. This information may be shared with other Federal agencies, *i.e.*, General Services Administration, as part of the FCC's Facility Reconstitution Plan.

1.5 Is this information system being changed or upgraded?

- Yes
- No

If the information system is being changed or upgraded, please explain the purposes for changing or upgrading the information system:

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

Information about FCC Employees:

- No FCC employee(s) data
- FCC employees names
- Other names used, *i.e.*, maiden name, *etc.*
- SSN
- US Citizenship
- Non-US Citizenship
- Biometric data
 - Fingerprints
 - 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
- 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)
- 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 personal/background information: The Cadapult Space Management System database includes information on the employees' organization, *e.g.*, bureau/office/division, pay type, grade, supervisory status, bargaining unit, workspace location (office or workstation), work telephone number, and barcode(s) on information technology (IT) equipment assigned to employee.

Information about FCC Contractors:

- No FCC contractor information
- Contractor's name
- Other names used, *i.e.*, maiden name, *etc.*
- SSN
- US Citizenship
- Non-US Citizenship
- Biometric data
 - Fingerprints
 - 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
- 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 personal/background information: The Cadapult Space Management System database includes information on the contractor's FCC organizational unit, *e.g.*, bureau/office/division, contractor's work location, work telephone number, and barcode(s) on IT equipment assigned to contractor.

Information about FCC Customers or Visitors:

- Not applicable
- Consumer/customer name
- Citizenship
- 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 account number(s)
- Digital signature
- Other information, please specify:

"Non-personal" information obtained from FCC sources:

- Not applicable
- Economic data
- Engineering/scientific data
- Accounting/financial data
- Legal/regulatory/policy data
- Other information, please specify: The CSMS is used to track occupied and non-occupied space in FCC facilities.

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 cubical number)
- 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, please specify:

Miscellaneous Business Information:

- Not applicable
- Not publicly available business data, *i.e.*, trade or propriety information
- Other information, please specify:

1.7 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:
- Non-personal information from Businesses and other for-profit entities:
- Non-personal information from Institutions and other non-profit entities:
- Non-personal information from Farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from State, local, or tribal governments:
- Other sources, please specify: The Bureau/Office (B/O) Associate Bureau Chief for Management obtains and inputs the information into the CSMS.

1.8 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 Cadapult Space Management System (CSMS) is a "stand alone" database that has been developed to be used exclusively for FCC internal space management purposes. Portions of the information may be shared with other Federal agencies or other third parties as part of an FCC Facility Reconstitution Plan.

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

- Not applicable—this is a “stand alone” information system
- SSN
- Other names used
- Citizenship
- Biometric data
 - Finger prints
 - Voice prints
 - Retina scan/prints
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
 - Photographs
- 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
- Non-FCC government badge number (employee ID)
- Law enforcement data
- Military history
- National security data
- Communications protected by legal privileges
- 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 account number(s)
- Other information, please specify:

“Non-personal” information:

- Not applicable
- Economic data
- Engineering/scientific data
- Accounting/financial data
- Legal/regulatory/policy data
- Other information, please specify:

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 cubical number)
- 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, please specify:

Miscellaneous Business Information:

- Not applicable
- Not publicly available business data, i.e., trade or propriety information
- Other information, please specify:

- 1.10 Will the information system derive new information or create previously unavailable information through aggregation or consolidation from the information that will now be collected, including information that is being shared or transferred from another information system?

Yes
 No

Please explain your response:

The Cadapult Space Management System (CSMS) is utilized to manage the FCC's space and to document the location and workspace type of occupants, *e.g.*, FCC employees or contractors. The is a "stand alone" database for the FCC's internal use only.

In an emergency, the Space Management Center will have to pull information from this database to create the space requirements for alternative work location(s) in other office buildings to be used to relocate FCC employees and/or contractors. The information may be shared with other Federal agencies, *i.e.*, General Services Administration, as part of the FCC's Facility Reconstitution Plan.

- 1.11 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:

The Cadapult Space Management System can retrieve the employee or contractor's name, his/her organizational unit, and/or his/her workspace.

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

Yes
 No

Please explain your response:

The Cadapult Space Management System does not make any determinations about individual.

- 1.13 Has this information system ever existed under a system of records notice (SORN) by itself, or was it ever a part or component of another SORN?

Yes
 No

Please explain your response:

The Cadapult Space Management System has never existed under a SORN by itself, nor was it ever a part or component of another SORN.

1.14 If this information system contains data about individuals, *e.g.*, personally identifiable information (PII), what is the potential impact on individuals on whom the information is maintained in the information system if unauthorized disclosure or misuse of information occurs? (check one)

- Not applicable as the information system does not contain data on individuals.
- 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:

There is limited personally identifiable information in the Cadapult Space Management System. The FCC also limits access to FCC headquarters and has 24/7 security to prevent unauthorized individuals from gaining access to the buildings, offices, and facilities. Furthermore, the access rights to the CSMS are limited and restricted to authorized personnel.

1.15 Is this impact level consistent with the guidelines as determined by the FIPS 199 assessment?

- Not applicable as the information system does not contain data on individuals.
- Yes
- No

Please explain your response:

The Cadapult Space Management System has been designated as having a "moderate" risk level.

1.16 Has a "Certification and Accreditation" (C&A) been completed?

- Yes
- No

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

As a "minor application," the Cadapult Space Management System (CSMS) is currently scheduled for C&A activities. The date is dependent on resources and staff priorities.

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

- Independent risk assessment
- Independent security test and evaluation
- Other risk assessment and/or security testing procedure, *etc.*
- Not applicable

Please explain your response:

As an automated system, the CSMS must have a risk assessment, which the computer security program does in completing its Certification and Accreditation. This is required by Federal Information Security Management Act (FISMA).

1.18 Based on the information that you have provided thus far, if:

- The information you are collecting does not include information about individuals if you answered **NO** to one or more of questions 1.6, 1.7, 1.8, 1.9, 1.11, 1.12, 1.13, and/or 1.14 then:

The information system (IT application or paper files) does not contain information about individuals nor does it have shared links with other information systems that may also contain information about individuals that could constitute a privacy issue.

A Privacy Impact Assessment is **not required**.

- The information you are collecting does include information about individuals, and you answered **YES** to one or more of questions 1.6, 1.7, 1.8, 1.9, 1.11, 1.12, 1.13, and/or 1.14 then:

The information system (IT application or paper files) does contain information about individuals, or it does have shared links with other information systems that may also contain information about individuals that could constitute a privacy issue.

The information system **requires** a Privacy Impact Assessment (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.

Mary Kay Welch, Mgr, Space Management Center 3/27/07
[Information System Owner or Custodian, Title, and Date (MM/DD/YYYY)]

Lubie F. Smith 03/23/2007
[Privacy Analyst and Date (MM/DD/YYYY)]