

Federal Communications Commission
Office of the Managing Director



Privacy Threshold Analysis (PTA)¹
Customer Comment Database (CCD)
September 8, 2008

FCC Bureau/Office: Public Safety Homeland Security Bureau (PSHSB)

Privacy Analyst: Leslie F. Smith
Telephone Number: (202) 418-0217
E-mail Address: Leslie.Smith@fcc.gov

¹ This form is used to determine whether this information system requires a Privacy Impact Assessment.

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 should analyze 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 in the system and make the appropriate determination about how to treat the information/data, 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: September 2008
 Revised or upgraded information system—Revision or upgrade date:

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

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

Please explain your response:

PSHSB is creating a information system, the Customer Comment Database or CCD, to store the comments it receives via its two webpage electronic public comment cards. These are:

- (a) The PSHSB Comment Card: <http://www.fcc.gov/pshs/pshsdev/comment-card.html>; and
(b) The Summit Comment Card: <http://www.fcc.gov/pshs/pshsdev/summits/comment-card.html>.

PSHSB will also have a paper copy of the comment card available for participants in PSHSB's summits, conferences, and public forums, *etc.* to write in their comments.

If this is a new information system, please skip to Question 1.6.

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

- Yes
- No

Please explain your response:

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

- Yes
- No

Please explain your response:

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

- Yes
- No

Please explain your response:

1.5 Is this information system being changed or upgraded, and if so, what are the purposes for changing or upgrading the information system, and/or will any changes now include personally identifiable information (PII):

- Yes
- No

Please explain your response:

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

PSHSB's new Comment Card Database information system will maintain the public comments that participants in the PSHSB summits, conferences, and public forums *etc.*, and the public-at-large may submit voluntarily via the PSHSB's webpage comment cards. PSHSB staff will use the information ("feedback") to enable the bureau to improve the quality of its summit conferences, public forums, *etc.*, and to serve the summit and conference participants better.

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

Information about FCC Employees:

- No FCC employee(s) data
- FCC employee's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)

- SSN
- US Citizenship
- Non-US Citizenship
- Race/ethnicity
- Gender
- 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)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s)
- 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 personal/background information:

Information about FCC Contractors:

- No FCC contractor information
- Contractor's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- 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)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- 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:

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

- Not applicable
- Individual's name:
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- 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)
- Personal e-mail address(es):
- 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
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: PSHSB's customer comment information system allows the public-at-large and summit, conference, and public forum participants to submit comments to PSHSB on a voluntary basis via the PSHSB Comment Card and the Summit Comment Card. The information that participants submit their names, and they may include other personally identifiable information such as their personal cell phone numbers, home telephone numbers, and personal e-mail addresses, *etc.*, as part of their "comments" and/or "suggestions," particularly if the individuals are home-based consultants, contractors, *etc.*

Information about Business Customers and others (usually not considered “personal information”):

- Not applicable
- Name of business contact/firm representative and others
- Race/Ethnicity
- Gender
- Full or partial SSN
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Business/office address
- Intra-business office address (office or cubical number)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager 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
- Personal clubs and affiliations **STOP**
- Credit card number(s)
- Bank account(s)
- Other information, please specify: PSHSB summit, conference, and public forum participants and the public-at-large may provide their names and their personal cell phone numbers, home telephone numbers, and personal e-mail addresses (specifically) and other personally identifiable information if the individuals are consultants, independent contractors, *etc.* who work from home. Such information is provided voluntarily.

“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:

Miscellaneous Business, Technology, or Other Information:

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

1.8 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: Individuals may provide PII as part of the comments they submit via the PSHSB comment cards.
- Non-personal information from businesses and other for-profit entities: Business representatives may provide PII as part of the comments they submit via the PSHSB comment cards.
- Non-personal information from institutions and other non-profit entities: Representatives from institutions and non-profits may provide PII as part of the comments they submit via the PSHSB comment cards.
- Non-personal information from farms:
- Non-personal information from Federal Government agencies: Representatives from Federal agencies, including the military, may provide PII as part of the comments they submit via the PSHSB comment cards.
- Non-personal information from state, local, or tribal governments: Representatives from States, localities, and tribal governments may submit PII as part of the comments they submit via the PSHSB comment cards.
- Other sources, please specify:

1.9 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 PSHSB Comment Card Database is a "stand alone" information system, *e.g.*, it has no links to other FCC and/or non-FCC information systems.

If this information system is a "stand alone" information system, *e.g.*, it does not use information from another system, and/or it is not linked to another information system, please skip to Question 1.13.

1.10 If the system uses information, including information about individuals (PII), from other information systems, what information will be used?

Information system name(s):

- Individual's name
- Other names, *i.e.*, maiden name, *etc.*
- SSN
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. 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
- 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 number(s)
- Bank account(s)
- Personal e-mail address(es)
- Non-FCC personal employment records
- Non-FCC government badge or employee ID number(s), *e.g.*, contractor's badge number.
- Law enforcement data
- Background investigation history
- Military history
- National security data
- Foreign countries visited
- Other information, please specify:

Information about Business Customers and others (usually not considered “personal information”):

- Not applicable
- Name of business contact/firm representative, customer, or others
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional/Personal clubs and/or affiliations
- Partial SSN
- Intra-business office address (office or workstation)
- Business/office address
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Race/Ethnicity
- Customers’ gender(s)
- 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)
- Credit report(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:

“Non-personal” information:

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

1.11 What are the sources for the information from the other information system(s) 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:

1.12 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:

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:

Information in the PSHSB Comment Card Database information system can be retrieved by an individual's name and also telephone numbers and e-mail address(es), which may include personal cell phone, home telephone numbers, and/or personal e-mail addresses for some submitters.

1.14 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:

Any personally identifiable information (PII) that the public submits is done on a voluntary basis. PSHSB will use the comments, including PII, as part of its efforts to improve its summit, conferences, and public forums, *etc.*, and public outreach activities.

If the information system does not contain information about individuals, please skip to Question 1.16.

1.15 What is the potential impact or “security risk” 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:

The only PII that the PSHSB Comment Card Database information system collects is each submitter's name and possibly his/her personal cell phone number, home telephone number, and/or personal e-mail address(es), which the submitter would be providing voluntarily.

- 1.16. What is the potential impact or “security risk” for the non-personally identifiable information that is maintained in the information system if an unauthorized disclosure or misuse of information occurs?

(check one)

- Results in little or no harm, embarrassment, inconvenience, or unfairness.
 Results in moderate harm, embarrassment, inconvenience, or unfairness.
 Results in significant harm, embarrassment, inconvenient, or unfairness.

Please explain your response:

The information that each submitter may provide and that is done voluntarily will only consists of the business contact information, *i.e.*, name, company telephone number, company e-mail address, *etc.*

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

- Yes
 No

Please explain your response:

The PSHSB Comment Card Database information system has not been given a FIPS 199 assessment.

- 1.18 When was “Certification and Accreditation” (C&A) last completed?

The C&A for PSHSB Comment Card Database information system has not been done yet.

- 1.19 Has the Chief Information Officer (CIO) and/or the Chief Security Officer designated this information system as requiring an

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

Please explain your response:

The PSHSB Comment Card Database information system has not been evaluated to determine if it meets the threshold for these risk assessments and security requirements.

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

- The information you are collecting does not includes information about individuals if you answered **NO** to questions 1.5, 1.7, 1.8, 1.9, 1.10, 1.11, 1.13, 1.14 and/or 1.16, 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 questions 1.5, 1.7, 1.8, 1.9, 1.10, 1.11, 1.13, 1.14, and /or 1.15, 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).