

**Federal Communications Commission**  
*Office of the Managing Director*



**Privacy Threshold Analysis (PTA)<sup>1</sup>**  
**Integrated Spectrum Auction System (ISAS)**

**September 30, 2012**

**FCC Bureau/Office: Wireless Telecommunications Bureau (WTB)**  
**Division: Auctions and Spectrum Access Division (ASAD)**

**Privacy Analyst: Les Smith**  
**Telephone Number: (202) 418-0217**  
**E-mail Address: [Leslie.Smith@fcc.gov](mailto:Leslie.Smith@fcc.gov)**

---

<sup>1</sup> 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 Analysis (PTA)** 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 Analysis 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 (PIA)** to be conducted.

### Section 1.0 Information System’s Status:

#### 1.1 Status of the Information System:

- New information system—Implementation date:
- Revised or upgraded information system—Revision or upgrade date: February 2012.

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: February 2012.

Please explain your response:

The Wireless Telecommunications Bureau (WTB) is adding new fields to the Integrated Spectrum Auction System's (ISAS) databases to expand the ISAS's scope to include universal service support auction functions.

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:

ISAS was created for WTB's spectrum auction functions.

- 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:

As noted above ISAS was created to handle WTB's spectrum auction functions.

- 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:

There is no SORN associated with ISAS.

- 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:

As noted above ISAS is being upgraded to expand its database functions to handle universal service fund (USF) spectrum auction functions. The USF support functions do not include any PII.

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

As noted in Question 1.1, ISAS is being expanded to include universal service fund (USF) spectrum auction functions.

- 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 FCC staff in WTB who reviews the USAC application.

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 personal/background 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)
- 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 Business Customers (usually not considered “personal information”):**

- Not applicable
- Name of business contact/firm representative
- 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
- Credit card number(s)
- Bank account(s)
- Other information:

**“Non-personal” information obtained from FCC sources:**

- Not applicable
- Economic data
- Engineering/scientific data Information related to spectrum auctions and functions.
- Accounting/financial data
- Legal/regulatory/policy data

Other information:

**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:
- Non-personal information from businesses and other for-profit entities: Information related to spectrum auctions.
- Non-personal information from institutions and other non-profit entities: Information related to spectrum auctions.
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments: Information related to spectrum s.
- 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:

Information in ISAS is related exclusively to spectrum auctions and related functions, although ISAS does receive information from the FCC's Commission Registration System (CORES), which acknowledges that an individual has registered with the FCC to conduct business, *i.e.*, to participate in a spectrum auction, etc. Any information in ISAS that pertains to an individual would be associated with the individual in his/her entrepreneurial capacity as a participant in WTB's spectrum auctions.

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 1.12.

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 Individuals in their entrepreneurial capacity who are participating in the spectrum auctions.
- 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 e-mail address(es)
- Personal fax number(s)
- Emergency contact data
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- 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: Financial information from the registration process about each individual (in his/her entrepreneurial capacity) who participates in the spectrum auctions is transferred from the FCC's Financial Operations Genesis information system. This information was collected during the spectrum auction application process, including the FCC Registration Number (FRN), and ownership data from Universal Licensing System (ULS) such as equity partnership and/or corporate ownership data, *etc.*

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

- Not applicable
- Name of business contact/firm representative, customer, or others Name of the business that is participating in the spectrum auctions.
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional/Personal clubs and/or affiliations
- Full or 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: Financial information from the registration process about each business that participates in the spectrum auctions is transferred from the FCC's Financial Operations Genesis information system. This information was collected during the spectrum auction application process, including the FCC Registration Number (FRN), and ownership data from Universal Licensing System (ULS) such as equity partnership and/or corporate ownership data, etc.

**Miscellaneous Business Information:**

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

**“Non-personal” information:**

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

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: Information from the FCC Financial Office's Genesis information system concerning the applicant's registration to participate in spectrum auction and ULS.

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

(where applicable) information that is being shared or transferred from another information system?

- Yes  
 No

Please explain your response:

ISAS is used exclusively for the spectrum auction and universal service support auction functions.

- 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:

The FCC has designed its registration process to have eliminated all PII from this process. All registrants receive their FRN, which is used to identify them and for them to conduct business with the FCC, including participation in spectrum auctions via ISAS and universal service functions.

- 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:

As noted in Question 1.13, ISAS is used for spectrum auctions and ULS exclusively. There is no PII involved.

If the information system contains information about individuals, please answer Question 1.15; but 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:

- 1.16. What is the potential impact or “security risk” for the 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 harm from unauthorized disclosure is related to the potential risk for premature disclosure of a firm's propriety information prior to the spectrum auction, which could create an anti-competitive factor in the auction, rather than harm from a security risk. Once the auction is concluded and the period of limited information disclosure has ended, the FCC makes all information that the participants included in their auction application publicly available.

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

- Yes
- No

Please explain your response:

ISAS is a "non major" information system, and as such, it is exempt for the FIPS 199 assessment guidelines.

The risk factors identified above are consistent with the FIPS 199 assessment.

1.18 When was the Security Authorization last completed?

The Security Authorization was completed in 2009.

1.19 Has the Chief Information Officer (CIO) and/or the Chief Security Officer (CSO) 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: A Fraud Risk Assessment is completed annually

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).

