

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



**Privacy Impact Assessment<sup>1</sup> (PIA) for the  
Broadband Dead Zone Report and Consumer Broadband Test**

**September 22, 2010**

**FCC Bureau/Office:** Office of Managing Director (OMD)  
**Division:** Broadband Task Force

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<sup>1</sup> 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—Implementation date:
- Revised or upgraded information system—Revision or upgrade date: May 2010

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

- Placed in existing information system—Implementation Date: May 2010
- Placed in new auxiliary/ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

The Office of Strategic Planning (OSP) has revised the Broadband Unavailability Survey and Broadband Quality Test. The information system is now called, the Broadband Dead Zone Report and Consumer Broadband Test. OSP published a notice in the *Federal Register* on April 7, 2010 (75 FR 17738) announcing this and other substantive changes to the system of records notice (SORN), FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test," which covers the personally identifiable information (PII) in the Broadband Dead Zone Report and Consumer Broadband Test. The Commission received only two comments, both of which supported the changes to this revised system of records notice. See also Question 1.15.

#### 1.2 Has a Privacy Threshold Assessment been done?

- Yes  
Date: September 15, 2010.

The initial PTA was done in March 2010, but it has been revised to reflect the changes that were made to the information system, *etc.*, when the revised SORN was published in April 2010, as noted above.

- No

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

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:

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:

If there have been no such changes, please skip to Question 1.6.

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:

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

- Yes
- No

If yes, please explain your response:

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

1.7 If this information system has links to another information system, 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.*
- FCC badge number (employee ID)
- SSN
- Race/Ethnicity
- Gender
- U.S. 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
- 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 information:

**Information about FCC Contractors:**

- No FCC contractor information
- Contractor's name
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- SSN
- U.S. Citizenship
- Non-U.S. Citizenship
- Race/Ethnicity
- Gender
- 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 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:

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

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

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:
- 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:

1.10 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:

If the information system does not use any PII from other information systems, including both FCC and non-FCC 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?

- FCC information system and information system name(s):
- Non-FCC information system and information system name(s):
- FCC employee's name:
- (non-FCC employee) individual's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- Other Federal Government employee ID information, *i.e.*, badge number, *etc.*
- SSN:
- Race/Ethnicity
- Gender

- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Fingerprints
  - Voiceprints
  - 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)
  - Personal e-mail address(es)
  - Non-FCC personal employment records
  - Non-FCC government badge number (employee ID)
  - Law enforcement data
  - Military records
  - National security data
  - Communications protected by legal privileges
  - Financial history
  - Foreign countries visited
  - Background investigation history
  - Digital signature
  - Other information:

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

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- 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
- 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 an 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/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test."

Please provide the citation that was published in the *Federal Register* for the SORN: 75 FR 17738 (April 7, 2010).<sup>2</sup>

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:

If this information system has been a component or a subset of another System of Records Notice (SORN), what is the SORN of which it is now or was 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 a system of records notice (SORN) for this information system, *e.g.*, why is the information being collected?

- 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

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<sup>2</sup> The initial system of records, FCC/OMD-27, "Broadband Unavailability Survey and Broadband Quality Test," was published in the *Federal Register* on December 30, 2009 (74 FR 69098). However, as noted in Question 1.2, the Commission made substantive changes to the information system, including a name change to the SORN, which required the re-publication of the SORN on April 7, 2010.

Please explain your response:

If the use of this information is both relevant and necessary to the processes for this information system is designed, 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 are categories of individuals covered by the system of records notice (SORN)?

1.23 What are the categories of records, *e.g.*, types of information (or records) that the system of records notice (SORN) collects, maintains, and uses?

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

1.25 What are the purposes for collecting, maintaining, and using the information covered by the system of records notice (SORN)?

1.26 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 Information 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:
- Others “third party” disclosures:

1.27 Will the information be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

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

1.29 How is information in this system retrieved or otherwise accessed?

1.30 What are the safeguards that the system manager has in place to protect unauthorized access to the information covered by the system of records notice (SORN)?

1.31 What policies and/or guidelines are in place on how long the bureau/office will retain the information?

1.32 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?

1.33 Has a 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:**

1.34 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:

The FCC's Security Operations Center (SOC) has not assigned a security classification to this system of records.

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:

This system of records is now located in the Office of Strategic Planning (OSP), Federal Communications Commission (FCC), 445 12<sup>th</sup> Street, S.W., Washington, DC 20554.

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 this system include individuals (users) who participate in the Broadband Dead Zone Report voluntary survey and individuals (users) who participate in the voluntary Consumer Broadband Test.

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 this system include the street address, city, state, zip code, and the Internet Protocol (IP) address of each individual who selects to participate in the Broadband Dead Zone Report survey and each individual who participates in the Internet service Consumer Broadband Test.

Additionally, the Consumer Broadband Test also (automatically) collects the "Internet Protocol (IP) address" of each user who selects to participate.

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:

Broadband Data Improvement Act of 2008, Public Law 110-385, Stat 4096 section 103(c)(1); American Reinvestment and Recovery Act of 2009 (ARRA), Pub. L. 111-5, 123 Stat 115 (2009); and Communications Act, 47 U.S.C. 154(i).

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 Commission uses the records in this system collected from the Broadband Dead Zone Report and the Consumer Broadband Test to determine the access of U.S. residents to broadband--cable, and DSL, fiber, mobile wireless, and other broadband services, and to gather data on the quality of the broadband services being provided. The Consumer Broadband Test permits users to measure the quality of their fixed or mobile Internet broadband connection. Individual street addresses and IP addresses will not be made public by the FCC, but aggregated or anonymized data from the database may be made public. Additionally IP addresses may be shared with FCC software partners as part of the Consumer Broadband Test application. These partners may publish IP addresses and broadband performance data to the public (but the IP address will not be associated with a street address). These data may be used to inform implementation of the National Broadband Plan, the National Broadband Map, and other proceedings related to the provisioning of broadband services.

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

Please check all Routine Uses that apply and provide any explanation as required:

- 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: Public-private partnerships and with the Telecommunications Program of the United States Department of Agriculture (USDA) Rural Development Agency (RDA). This sharing regime is described in the Commission's Broadband Data Order of 2008 (FCC 08-89);
- Breach of Federal data: OMB Memorandum M-07-16 (May 22, 2007).
- Others Routine Use disclosures not listed above: National Telecommunications and Information Administration (NTIA) and the 56 State Designated Entities for the State Broadband Data & Development Grant Program, who are tasked with gathering broadband availability information that will be delivered to the FCC and NTIA for compilation into the National Broadband Map..

2.8 Have there been any changes as 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:

Information in this system is not 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 information includes the electronic data and records that are stored in the FCC's computer network databases.

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 the Broadband Dead Zone Report and Consumer Broadband Test system may be retrieved by the responses to the broadband Internet access questions:

- (1) Broadband access (yes/no);
- (2) Broadband service availability (check boxes for types of broadband services available at an individual's home);
- (3) The individual's home address: Street address, city, state, and zip code; and
- (4) The individual's IP address.

Furthermore, the information may be retrieved and/or aggregated based upon other Consumer Broadband Test variables, such as broadband speed, latency, jitter, and packet loss, among other broadband quality variables.

- 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:

Access to the information in the Broadband Dead Zone Report or the Consumer Broadband Test database, which is housed in the FCC's computer network databases, is restricted to authorized supervisors and staff in the Office of Strategic Planning (OSP) and the Information Technology Center's (ITC) Planning and Support Group, who maintain these computer databases. Additionally staff of the National Broadband Map may be granted access to these data. Other FCC employees and contractors may be granted access on a "need-to-know" basis. The FCC's computer network databases are protected by the FCC's security protocols, which include controlled access, passwords, and other security features. Information resident on the database servers is backed-up routinely onto magnetic media. Back-up tapes are stores on-site and at a secured, off-site location.

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 information in this system is limited to electronic files, records, and data, which pertains to the Dead Zone Report, which includes:

- (1) The information obtained from individuals who participated in the Consumer Information survey; and
- (2) The information obtained from individuals who participated in the Consumer Broadband Test.



Until the National Archives and Records Administration (NARA) approves the retention and disposal schedule, these records will be treated as permanent.

**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:

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 OSP supervisors and staff have responsibility for access and proper use of the information in the Broadband Dead Zone Report and Consumer Broadband Test information system.
- FCC staff in other bureaus/offices:
- Information system administrator/Information system developers:
- 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)?

As noted in Question 2.11, access to the electronic records, files, and data in the Broadband Dead Zone Report and Consumer Broadband Test, which is stored on the FCC's computer network databases, is restricted to authorized supervisors and staff in OSP and in the ITC's Planning and Support Group. Other FCC employees and contractors may be granted access on a "need to know" basis, as dictated by their job duties and responsibilities.

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: Other OSP staff and contractors may be granted access on a "need-to-know" basis, as dictated by their job duties and responsibilities.

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: OSP supervisors and staff and ITC supervisors, staff, and contractors.
- Information system administrators: ITC supervisors, staff, and contractors.
- Information system developers:
- FCC staff in this bureau/office: OSP employees and contractors are granted access on a "need to know" basis.
- FCC staff in other bureaus/offices: Other FCC employees and contractors are granted access on a "need-to-know" basis.
- FCC staff in other bureaus/offices in FCC field offices: FCC employees and contractors are granted access based on a "need to know" basis.
- Contractors: Contractors working under OSP and ITC authority.
- Other Federal agencies: NTIA and RDA are permitted to request access to the data.
- State and/or local agencies: Designated state entities ("eligible entities") under the broadband mapping program (aka "eligible entities") are granted access to the data.
- Businesses, institutions, and other groups:
- International agencies:
- Individuals/general public:
- Other groups:

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 ITC supervisors provide periodic privacy training to the IT contractors who handle the PII that is contained in the Broadband Dead Zone Report and Consumer Broadband Test databases.

3.8 Do any Section M contract(s) associated with the information system covered by this system of records notice (SORN) include the required FAR clauses (FAR 52.224-1 and 52.224-2)?

- Yes
- No

Please explain your response:

The OGC staff has reviewed and signed-off on the Section M contracts for the ITC contractors who manage the Broadband Dead Zone Report and Consumer Broadband Test databases, including the PII covered by FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, as required by Sections 52.224-1 and 52.224-2 of the Federal Acquisition Regulation (FAR).

- 3.9 Does the information system covered by this system of records notice (SORN) transmit/share personal information, *e.g.*, personally identifiable information (PII), between the FCC information technology (ITC) 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:

As noted in two routine uses in this SORN:

Routine Use 7: The information collected through the Broadband Dead Zone Report and Consumer Broadband Test, with the exception of the personally identifiable information (PII), may be shared with public-private partnerships and with the Telecommunications Program of the United States Department of Agriculture (USDA) Rural Development Agency. This sharing regime is described in the Commission's Broadband Data Order of 2008 (FCC 08-89).

Routine Use 8: The information collected through the Broadband Dead Zone Report and Consumer Broadband Test, including the personally identifiable information (PII), may be shared with the National Telecommunications and Information Agency (NTIA) and the 56 State Designated Entities for the State Broadband Data & Development Grant Program ("56 State Designated Entities"), who are tasked with gathering broadband availability information that will be delivered to the FCC and NTIA for compilation into the National Broadband Map. Any PII shared with these entities will be disclosed under the rules of the agreement between NTIA and the state grantees governing the protection of sensitive, protected, or classified data collected pursuant to the grant program. The NTIA and the state grantees will not make any PII publicly available.

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 in Question 3.9, the FCC may share the information collected through the Broadband Dead Zone Report and Consumer Broadband Test with the NTIA, USDA Rural Development Agency (non-PII data), and the 56 State Designated Entities. The information will be used to support the National Broadband Map.

- 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.*?

As noted in Question 3.9, any PII that the FCC shares with the NTIA and the 56 State Designated Entities transmissions will be disclosed under the rules of the agreement between the NTIA and these 56 State Designated Entities (state grantees) governing the protection of sensitive, protected, or classified data collected pursuant to the grant program. The NTIA and these 56 State Designated Entities (state grantees) will not make any PII publicly available.

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: USDA's Rural Development Agency (non-PII data) and NTIA
- State, local, or other government agencies: 56 State Designated Entities for the State Broadband Data & Development Grant Program (state grantees)
- Businesses: public-private partnerships (non-PII data)
- Institutions: public-private partnerships (non-PII data)
- Individuals:
- Other groups:

If there is no “matching agreement,” *e.g.*, *Memorandum of Understanding (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?

As noted in Question 3.9, the non-PII that the FCC shares with the public-private partnerships and the NTIA and USDA Rural Development Agency is described in the Commission's Broadband Data Order of 2008 (FCC 08-89). A *Memorandum of Understanding (MOU)* also exists between the FCC and NTIA that covers the confidentiality and sharing of data. These data may include PII.

3.14 Is this a new or a renewed matching agreement?

- New matching agreement
- Renewed matching agreement

Please explain your response:

As noted in Question 3.13, the specifics of this sharing agreement are in the Broadband Data Order of 2008 (FCC 08-89). A *Memorandum of Understanding (MOU)* also exists between the FCC and NTIA that covers the confidentiality and sharing of data. These data may include PII.

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:

As noted in Question 3.13, the specifics of this sharing agreement are in the Broadband Data Order of 2008 (FCC 08-89). Since this agreement includes only non-PII data, there is no requirement for Data Integrity Board review. A *Memorandum of Understanding (MOU)* also exists between the FCC and NTIA that covers the confidentiality and sharing of data. These data may include PII.

- 3.16 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?”
- As noted in Question 3.14, the specifics of the sharing arrangement are contained in the Broadband Data Order of 2008 (FCC 08-89). A *Memorandum of Understanding (MOU)* also exists between the FCC and NTIA that covers the confidentiality and sharing of data. These data may include PII.
- 3.17 How is the shared information secured by the recipient under the *MOU*, or other “matching agreement?”
- As noted in Question 3.14, the specifics of the sharing arrangement are contained in the Broadband Data Order of 2008 (FCC 08-89). The FCC is reasonably certain that both the NTIA and the USDA have sufficient security protocols to guard the information sharing that they will receive.

**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 is collected. The Broadband Dead Zone Report and Consumer Broadband Test are only collecting data for these specific purposes, as noted in the OMB submission under the Paperwork Reduction Act (PRA) regulations and metrics (see Question 4.2).
  - Information is reliable for its intended use(s). The FCC has employed industry standard testing software
  - Information is accurate. The information received is accurate for its intended use, and as noted above, the Broadband Report and Test comply with the PRA metrics.
  - Information is complete. As noted above, the Broadband Report and Test comply with the PRA metrics; also note that these are on-going tests.
  - Information is current. The information is current as it is collected at the time of the test and stored along with a date stamp.
  - Not applicable:

Please explain any exceptions or clarifications:

While FCC employees and contractors may participate in the Broadband Test, they do so strictly as members of the public-at-large.

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: Individuals who participate in the Broadband Dead Zone Report's survey and the Consumer Broadband Test as members of the

public-at-large; and the NTIA and 56 State Designated Entities who are tasked with gathering broadband availability information that is to be delivered to the FCC as part of the National Broadband Map.

- Information is processed and maintained only for the purposes for which it is collected: The purpose of the collection is to understand the current speeds of broadband users at the time of the test or report submission.
- Information is reliable for its intended use(s): Yes, its intended use is to help the FCC understand the state of broadband in the US, combined with other sources of data.
- Information is accurate: The data are collected using industry standard speed testing software.
- Information is complete: As noted in Question 4.1, the Broadband Report and Test comply with the PRA regulations.
- Information is current: The information is current as it is collected at the time of the test and stored along with a data stamp.
- No information comes from non-FCC sources:

Please explain any exceptions or clarifications:

The Broadband Dead Zone Report survey and the Consumer Broadband Test were required to comply with the requirements for statistical sampling as required by the Office of Management and Budget under the regulations of the Paperwork Reduction Act before the OSP staff could administer these two metrics. Thus, the Broadband Report's survey and the Broadband test meet the Data Quality guidelines.

If the information that is covered by this system of records notice (SORN) is not being aggregated or consolidated, please skip to Question 4.5.

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?

As noted in Question 4.2, the Broadband Report's survey and the Broadband Test have met the statistical requirements of the PRA.

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?

As noted in Question 4.2, the Broadband Report's survey and the Broadband Test have met the statistical requirements of the PRA.

4.5 How often are the policies and procedures checked routinely—what type of annual verification schedule has been established to insure that the information that is covered by this system of records notice adheres to the Data Quality guidelines?

As noted in Question 4.2, the Broadband Report's survey and the Broadband Test have met the statistical requirements of the PRA. OSP has not yet determined how frequently it will conduct future Broadband Dead Zone Report surveys and/or Consumer Broadband Tests.

**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 CDs, CD-ROMs, *etc.*
- Electronic tape
- Paper files
- 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:

The information that the Broadband Dead Zone Report and the Consumer Broadband Test collect, store, analyze, and maintain is unique and is not available in other forms or from other sources.

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:

The information in the Broadband Dead Zone Report and the Consumer Broadband Test, including the PII covered by FCC/OSP-1, “Broadband Dead Zone Report and Consumer Broadband Test” SORN, has no links to other FCC information systems.

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:

The information in the Broadband Dead Zone Report and the Consumer Broadband Test databases, including the PII covered by FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, is unique and specific to the purposes for which it was developed as part of the National Broadband Map that is being developed by the FCC and the NTIA with the assistance of the 56 State Designated Entities, public-private partnerships and the Telecommunications Program of the USDA's Rural Development Agency. necessary a function for the Commission. However, this database is an auxiliary or ancillary usage, and not an essential FCC function.

- 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](http://www.fcc.gov) or other URL 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:

This information system collects data via a portal into a database management system. The PII data will not made available via a URL, which would allow customers/users access to the development production or internal FCC networks.

Unless the information may be collected via [www.fcc.gov](http://www.fcc.gov) or other URL, please skip Question 5.9. and 5.10.

- 5.9 If the information is collected via [www.fcc.gov](http://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: <http://www.fcc.gov/fccprivacypolicy.html>

Privacy notice displayed on the webpage: <http://www.broadband.gov/broadband-quality-test-privacy-statement.html>.

Privacy notice printed at the end of the form or document:

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—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

5.11 Will the information system include another customer-facing web site not on [www.fcc.gov](http://www.fcc.gov)?

- Yes
- No

Please explain your response:

It is presented on the FCC domain at: [www.broadband.gov](http://www.broadband.gov).

Unless the information may be collected by a customer-facing web site on the FCC's Intranet, please skip Question 5.12 and 5.13.

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—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

Unless the information may be collected by some method or mechanism other than by fax, e-mail, FCC form(s), or regular mail, please skip Questions 5.14 and 5.15.

5.14 If information is collected from the individual by fax, e-mail, FCC form(s), regular mail, or some other means not listed above, how is the privacy notice provided?

- Privacy notice is on the document, *e.g.*, FCC form, *etc.*
- Privacy notice displayed on the webpage where the document is located:  
<http://www.broadband.gov/broadband-quality-test-privacy-statement.html>.
- Statement on the document notifies the recipient that they may read the FCC Privacy Notice at [www.fcc.gov](http://www.fcc.gov).
- Website or FCC document uses other method(s) to alert users to the Privacy Act Notice: The privacy policy is also stated within the FCC's Mobile Consumer Broadband testing application.
- Privacy notice is provided via a recorded message or given verbally by the FCC staff handling telephone calls: The person conducting the survey will read the privacy notice to the survey participants, if requested.
- 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, 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—specify 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 via [www.FCC.gov](http://www.FCC.gov) or other URL, 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](http://www.FCC.gov), does it identify ages or is it directed to people under 13 years old?

- Yes
- No

Please explain your response:

The Broadband Dead Zone Report's survey and the Consumer Broadband Test are both directed at individuals over 18 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:

FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" covers the PII that is collected, used, and maintained via the Broadband Report's survey and Consumer Broadband Test. The survey and the test are the instruments by which the FCC will develop the Broadband Dead Zone Report and the National Broadband Map.

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

- Yes  
 No

Please explain your response:

An individual's participation in either or both the Broadband Report's survey and the Broadband Test is strictly voluntary.

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

- Yes  
 No

Please explain your response:

As noted in Question 5.18, an individual's participation in either or both the Broadband Report's survey and the Broadband Test is strictly voluntary. The FCC provides a notice of the privacy rights of each participant in each information collection instrument, *e.g.*, survey and test, and the uses that the FCC intends for the information that it collects. By consenting to participate, each participant relinquishes control over the use of their PII in compiling the Broadband Dead Zone Report and the National Broadband Map. An individual may decide not to participate in the survey and/or test.

If individuals do not have the right to consent to the use of their information, please skip to Question 5.22.

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 Is the information, *i.e.*, records, data, documents, *etc.*, that the information system collects, uses, maintains, *etc.*, being used to produce reports on the individuals whose PII is part of this information covered by the system of records notice (SORN)?

- Yes  
 No

Please explain your response:

As noted in Question 2.6, the Commission uses the records in this system collected from the Broadband Dead Zone Report and the Consumer Broadband Test to determine the access of U.S. residents to broadband--cable, and DSL, fiber, mobile wireless, and other broadband services, and to gather data on the quality of the broadband services being provided. The Consumer Broadband Test permits users to measure the quality of their fixed or mobile Internet broadband connection.

Individual street addresses and IP addresses will not be made public by the FCC, but aggregated or anonymized data from the database may be made public. Additionally IP addresses may be shared with FCC software partners as part of the Consumer Broadband Test application. These partners may publish IP addresses and broadband performance data to the public (but the IP address will not be associated with a street address). These data may be used to inform implementation of the National Broadband Plan, the National Broadband Map, and other proceedings related to the provisioning of broadband services.

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)
- Other:

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 information that is collected, used, stored and maintained in the Broadband Dead Zone Report and Consumer Broadband Survey information system's databases, including the PII that is covered by FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, are required to complete privacy training. In addition the OSP staff provides various notices and warnings to the employees and contractors who have access to the PII that it is not to be shared or disclosed without authorization.

5.25 How often are security controls reviewed?

- Six months or less:
- One year:
- Two years
- Three years: ITC conducts a review at least every three years.
- Four years
- Five years
- Other: In addition, to the three year ITC review, until the FCC determines whether the Commission will conduct future broadband surveys and tests, aside from this single survey and test, the OSP staff will not determine the long-term security control protocols for this information system, *etc.*

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: The FCC has also inaugurated a Commission-wide privacy training program, which requires all FCC employees and contractors to complete a privacy training course annually, beginning in September 2006.
- Two years
- Three years
- Four years
- Five years
- Other:

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: ITC does a review at least every three years.
- Other re-certification procedures: Also, as noted in Question 5.25, the Broadband Dead Zone Report and Consumer Broadband Test are single events. Until the FCC determines whether the Commission will conduct future broadband surveys and tests, OSP will not devise the appropriate privacy protocols for this information system, *etc.*, other than the existing privacy requirements that are in place to cover this information system's databases and the PII that is covered by FCC/OSP-1, “Broadband Dead Zone Report and Consumer Broadband Test” SORN.

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 Broadband Dead Zone Report and Consumer Broadband Test information system, including the PII covered by FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, conform to FISMA requirements since the OSP was required to submit the statistical analysis, *etc.*, to OMB as part of the PRA requirements, and the FCC has complied with the requisite privacy requirements, *i.e.*, SORN, breach notification, PTA, and PIA, *etc.*

If the Privacy Threshold Assessment was completed recently as part of the information system's evaluation, please skip Questions 5.30 through 5.33, and proceed 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:

5.31 Is the 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:

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:

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:  
 Independent security test and evaluation:  
 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 done so previously, *i.e.*, Smart Cards, Caller-ID, *etc*?

- Yes  
 No

Please explain your response:

The Broadband Dead Zone Report and Consumer Broadband Test information system does not use any new information technologies except the web portal mechanism that tests a participant's pc's broadband speed.

5.35 How does the use of the technology affect the privacy of the general public and FCC employees and contractors?

Since the broadband speed test is covered by FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, individuals may have reasonable assurance that the FCC has in place sufficient measures, as provided in this SORN, to guard the privacy of each individual who chooses to participate voluntarily in the broadband test.

5.36 Will the information system that is covered by this system of records notice (SORN) include a capability to identify, locate, and/or monitor individuals?

- Yes  
 No

Please explain your response:

The purposes of the Broadband Dead Zone Report and Consumer Broadband Test information system are: (1) to gather information that the FCC needs to support the National Broadband Map and (2) to allow individuals to check the broadband speed of their personal computer's Internet connection. The Broadband Dead Zone Report's survey does identify individuals, who agree to participate voluntarily in this survey, but that is the extent of this information system's purpose. As noted above, all PII that is collected is protected by safeguards listed in FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN.

It should also be noted that the survey's methodology has been approved by OMB under the requirements of the PRA.

If the information system does not include any monitoring capabilities, please skip to **Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA):**

5.37 If the information system includes these technical capabilities identified in Questions 5.34 through 5.36 above, what kinds of information will be collected as a function of the monitoring of individuals?

5.38 Does the information system covered by this system of records notice (SORN) contain any controls, policies, and procedures to prevent unauthorized monitoring?

- Yes  
 No

Please explain your response:

**Section 6.0 Information Collection Requirements under the Paperwork Reduction Act (PRA):**

6.1 Does the information system covered by this system of records notice (SORN) solicit information via paperwork and/or recordkeeping, *i.e.*, fill out forms and/or licenses, participate in surveys, and or maintain records *etc.*?

Yes, the information system solicits information via paperwork and/or recordkeeping, *i.e.*, fill out forms and/or licenses, participate in surveys, and or maintain records *etc.*

If so, which of these groups are affected?

Individuals (public-at-large), who are not FCC employees or contractors.  
 FCC employees and/or contractors.

No, the information system does not include any paperwork and/or recordkeeping.

If there are no paperwork or recordkeeping activities involved or if only FCC employees and contractors are the effected groups, this information system is exempt from the requirements of 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:

OSP has received approval from OMB under the PRA for the information collection requirements that are contained in the Broadband Dead Zone Report and Consumer Broadband Test information system. Participation in the Broadband Report (survey) and Test is purely voluntary.

6.3 If there are one or more PRA information collections that are covered by this system of records notice (SORN) that are associated with the information system's databases and paper files, please list the OMB Control Number, Title of the collection, and Form number(s) as applicable for the information collection(s):

3060-1129, Expires 04/30/2013, "Broadband Speed Test and Unavailability Registry"

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:  
 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:

OSP has received approval from OMB under the PRA for the information collection requirements that are contained in 3060-1129, Expires 04/30/2013, "Broadband Speed Test and Unavailability Registry" (as noted in Question 6.3).

**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 wishing to inquire whether FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, contains information about them may address their inquiries to the system manager in the Office of Strategic Planning (OSP). This is consistent with FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act, as noted in this 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 who seek access to the information about them that is contained in FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, may address their inquiries to the system manager in the Office of Strategic Planning (OSP). This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

- 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 in FCC/OSP-1, "Broadband Dead Zone Report and Consumer Broadband Test" SORN, may address their inquiries to the system manager in the Office of Strategic Planning (OSP). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

7.4 Does the FCC provide any redress to amend or correct information about an individual covered by 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 FCC/OSP-1, “Broadband Dead Zone Report and Consumer Broadband Test” SORN, may address their inquiries to the system manager in the Office of Strategic Planning (OSP). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

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:

The sources for the information in this system are the Broadband Dead Zone Report survey respondents and Consumer Broadband Test participants. The Commission made substantive changes to the information system holding the data, including the PII, covered by the Broadband Dead Zone Report (survey) and Consumer Broadband Test, including the name change, which necessitated a re-publication of the SORN in the *Federal Register* on April 7, 2010. (See Questions 1.1 and 1.15).

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:

FCC/OSP-1, “Broadband Dead Zone Report and Consumer Broadband Test,” SORN does not claim any exemption to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about themselves 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 OSP staff has posted notices that the information in the Broadband Dead Zone Report and Consumer Broadband Test system information system's electronic records, including the PII that is covered by FCC/OSP-1, “Broadband Dead Zone Report and Consumer Broadband Test” SORN, is “non public for internal use only.” The OSP staff 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 information 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: As noted in Questions 5.25 and 5.28, ITC does a three year review of the security controls and staff certifications of its information systems that are similar to audit procedures.
  - Four years
  - Five years
  - Other audit scheduling procedure(s): As also noted in Question 5.25, the Broadband Dead Zone Report and Consumer Broadband Test are single events. Until the FCC determines whether the Commission will conduct future broadband surveys and tests, OSP will not devise the appropriate audit procedures to comply with FCC and OMB regulations. (Note: these are on-going tests).

**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:

If there are no PRA issues, please skip to **Section 9.0 Risk Assessment and Mitigation:**

- 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?

<b>Risks:</b>	<b>Mitigating factors:</b>
a. The Broadband Dead Zone Report and Consumer Broadband Test information system collects PII to enable the FCC to conduct the survey that is used to support the National Broadband Map and to enable individuals to test their pc's Internet connect speed.	a. The OSP staff had insured that the PII that is collected in the broadband survey and via the broadband speed test is stored in the FCC's computer network databases is secured by the FCC computer security protocols.
b.	b.

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

Initial implementation: March 2010  
 Secondary implementation: May 2010  
 Tertiary implementation: February 2011  
 Other implementation: TBD

9.3 Are there any ancillary and/or auxiliary information system(s) applications linked to this information system that are 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 PIA:

As noted in Question 7.8, while these are on-going tests, at this time, the broadband survey and broadband speed test are the only applications, and there are no other ancillary or auxiliary information systems, *etc.*, which are related to the Broadband Dead Zone Report and Consumer Broadband Test.