

Federal Communications Commission
Office of the Managing Director



**Privacy Impact Assessment¹ (PIA) for the
Legislative Management Tracking System (LMTS)**

August 20, 2009

FCC Bureau/Office: Office of Legislative Affairs (OLA)

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

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

Having established through the **Privacy Threshold Analysis (PTA)** 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 2007

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

- Placed in existing information system—Implementation Date: January 2009
- Placed in new auxiliary/ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

In the process of upgrading the Legislative Management Tracking System (LMTS) to take advantage of new technologies, FCC determined that the LMTS information system that the Office of Legislative Affairs (OLA) uses to track the correspondence it receives from parties outside the FCC contains personally identifiable information (PII). OLA is also creating a system of records, FCC/OLA-1, "Legislative Management Tracking System (LMTS)," to cover the PII that this information system will collect, maintain, analyze, use, and store. The FCC will publish the system of records notice (SORN) in the *Federal Register*.

1.2 Has a Privacy Threshold Analysis (PTA) been done?

- Yes
Date: December 2008
- No

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

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

- Yes
- No

Please explain your response:

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

Information about FCC Employees:

- No FCC employee information
- FCC employee's name
- Other names used, *i.e.*, maiden name, *etc.*
- 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)
- 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 are 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, *i.e.*, 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), which will be included in the individual’s records, or will 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):

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

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

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

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

Yes
 No

If yes, please explain what has occurred:

The Legislative Management Tracking System (LMTS) is a "stand alone" information system. It has no links to other FCC or non-FCC information systems.

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

The FCC is going to create a new system of records notice, FCC/OLA-1, "Legislative Management Tracking System (LMTS), to cover the personally identifiable information that the LMTS information system collects, uses, maintains, and stores.

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?

The Office of Legislative Affairs (OLA) uses the Legislative Management Tracking System (LMTS) to track the correspondence that OLA receives from Congress. This correspondence may include attachments from parties outside the FCC that contain personally identifiable information (PII), which are included as the basis or justification for sending the correspondence to the FCC.

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

Office of Legislative Affairs (OLA), Federal Communications Commission (FCC), 445 12th Street, S.W., Washington, DC 20554.

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

Yes
 No

Please explain your response:

The Legislative Management Tracking System (LMTS) is used solely to accept Congressional and related correspondence, including attachments that may include PII from individuals who have contacted their member of Congress concerning various telecommunications issues affecting them, *i.e.*, telephone and cable bills, *etc.*, or FCC employees who have employment complaints with the Commission.

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:

The FCC's Security Operations Center (SOC) has not assigned a security classification to the Legislative Management Tracking System (LMTS) and to the PII that it collects, uses, and maintains, which is covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN.

1.22 What are the categories of individuals covered by the system of records notice (SORN)?

The categories of individuals include members of the U.S. House of Representatives and the Senate, members of the public-at-large, and FCC employees.

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?

The categories of records in the Congressional correspondence and any attachments may include:

- (1) Members of the public at large: the individual's name, Social Security Number (SSN), birth date, home address, home telephone number(s), personal cell phone number(s), account number(s) for telephone, cell phone, cable television, and satellite television services, and other, miscellaneous information that an individual may include in their Congressional complaint(s); and
- (2) FCC employees: individual's name, Social Security Number (SSN), birth date, birthplace, home address, home telephone number(s), personal cell phone number(s), FCC employment records, and other, miscellaneous information that a Commission employee may include in their Congressional complaint(s);

Depending upon its relevance to the complaint or inquiry, the Office of Legislative Affairs (OLA) will redact any personally identifiable information (PII), including birth date and Social Security Number from the attachments to the Congressional correspondence prior to filing these documents.

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

The legal authorities for maintenance of the PII covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN are 5 U.S.C. 301, 44 U.S.C. 3101 and 47 U.S.C. 154(i), (j), and (k), and 47 U.S.C. 155(a).

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

OLA uses the LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN, to store and manage correspondence from members of the U.S. House of Representatives and the U.S. Senate, the President, and Vice President. This correspondence might include attachments that could contain PII from individuals who contacted their Congressional representative and/or Senator concerning various personal and/or telecommunications issues affecting them, *i.e.*, telephone and cable bills, etc. FCC employees may be seeking Congressional assistance with their personal employment issues at the Commission, *i.e.*, hiring and promotion matters, *etc.*

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,"² 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 and reporting:
- 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: OMD Memorandum M-07-16 (May 22, 2007).
- Others "third party" disclosures:

1.27 Will the information be disclosed to consumer reporting agencies?

- Yes
- No

² Information about individuals in a system of records may routinely be disclosed for the following conditions, *e.g.*, "routine uses"; however, in each of these routine uses that are checked, the FCC will determine whether disclosure of the information, *i.e.*, records, files, documents, and data, *etc.*, is compatible with the purpose(s) for which the information has been collected

Please explain your response:

Information in the LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN, is not disclosed to any consumer reporting agencies.

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

Information in the LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System (LMST)" SORN is maintained as follows:

- (1) paper documents, records and files are stored in file cabinets in the OLA office suite; and
- (2) electronic records, data, and files are maintained in a computer database in the OLA office suite--access is restricted by use of passwords, and computer terminals in the OLA office suite.

- 1.29 How is information in this system, including the PII covered by this system of records notice (SORN) retrieved or otherwise accessed?

Information in the LMTS information system is retrieved by the correspondence log-in file number, Congress person's name, type of complaint, *etc.* The PII, *i.e.*, date of birth, Social Security Number, *etc.*, in any attachments is redacted prior to filing the correspondence if it is not relevant to the complaint or inquiry.

- 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)?

The information in the LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN, includes both paper documents and files and electronic records and data.

The paper documents and files are maintained in file cabinets that are located in the OLA office suite.

The electronic data and records are maintained in the FCC computer network databases. Access to the information in the computer database is restricted by use of passwords, and computer terminals in the OLA office suite. Data resident on network servers are routinely backed-up onto magnetic media. Back-up tapes are stored on-site and at a secure off-site storage location.

Only the OLA supervisors and staff and the ITC employees and contractors may have access to this information. Other FCC employees and contractors in the FCC's bureaus and offices may be granted access on a "need to know" basis as dictated by their job duties and responsibilities.

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

Pursuant to agency records schedule N1-173-03-2, item 5, information in the OLA information system data, including documents containing the PII that is covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN, is retained at the FCC for three years after cut off at the end of each calendar year. The documents relating to FCC policy (*i.e.*, Chairman correspondence) are then transferred to the National Archives and Records Administration (NARA).

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?

The paper documents, records, and files are destroyed by shredding. The electronic records and data are destroyed physically (electronic storage media) or by electronic erasure.

1.33 Have the records retention and disposition schedule(s) been issued or approved by the National Archives and Records Administration (NARA)?

- Yes
 No

Please explain your response:

As noted in Question 1.31, the Legislative Management Tracking System's records retention and disposition have been approved by NARA under FCC's agency records schedule no.: N1-173-03-2, item 5.

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:**

1.33 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:

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:

- 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:

- 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:

- 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:

- 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:

- 2.7 Have there been any changes to the “Routine Uses,”³ under which disclosures are permitted to “third parties” as noted in the system of records notice (SORN)?

- Yes
 No

³ Information about individuals in a system of records may routinely be disclosed for the following conditions, *e.g.*, “routine uses”; however, in each of these routine uses that are checked, the FCC will determine whether disclosure of the information, *i.e.*, records, files, documents, and data, *etc.*, is compatible with the purpose(s) for which the information has been collected

If the Routine Uses have changed, what changes were made:

(check all that apply and explain the changes)

- Adjudication and litigation:
- Committee communications and reporting:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:

- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA:
- Breach of Federal data:
- Others Routine Use disclosures not listed above:

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:

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:

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:

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:

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:

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 OLA supervisory staff has responsibility for access and proper use of the information in the LMTS 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)?

Access to the data in the LMTS information system is restricted to the OLA supervisors and staff and the staff in the Information Technology Center (ITC). Other FCC employees and contractors working at the FCC 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: FCC employees and contractors in OLA 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: OLA supervisory staff.
- Information system administrators: OLA supervisors and staff, including both FCC employees and contractors, who manage the LMTS information system's electronic data.
- Information system developers:
- FCC staff in this bureau/office: FCC employees in OLA are granted access on a "need to know" basis.
- FCC staff in other bureaus/offices: FCC employees are granted access on a "need to know" basis.
- FCC staff in other bureaus/offices in FCC field offices: FCC employees are granted access on a "need to know" basis.
- Contractors: Contractors working at the FCC are granted access on a "need to know" basis.
- Other Federal agencies:
- State and/or local agencies:
- 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 supervisory staff provides periodic privacy training to the IT contractors .

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 contracts covering contractors who work with the LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System" SORN, comply with the FAR clauses.

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 (IT) network(s) and a public or other non-FCC IT network(s), which are not covered by this Privacy Impact Assessment?

- Yes
 No

Please explain your response:

All information, including electronic data, records, and attachments and paper documents and files remain in the LMTS information systems. There are no links to other FCC or non-FCC information systems.

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?

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.*?

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:
 State, local, or other government agencies:
 Businesses:
 Institutions:
 Individuals:
 Other groups:

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

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

3.14 Is this a new or a renewed matching agreement?

- New matching agreement
- Renewed matching agreement

Please explain your response:

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

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

Please explain your response:

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

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

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

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

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

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

Please explain any exceptions or clarifications:

The information and activities covered by the LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System" SORN, are submitted as part of Congressional correspondence and inquiries. These Congressional correspondence and inquiries may include matters concerning FCC employees, *i.e.*, personnel actions or complaints, *etc.* The OLA staff adheres to the Data Quality Guidelines in all its responses to Congress.

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: Congressional correspondence, *i.e.*, constituent inquiries, which may include their constituent's PII either as stated in the correspondence or as an attachment and other requests related to telecommunications issues.

Information is processed and maintained only for the purposes for which it is collected:

Information is reliable for its intended use(s):

Information is accurate:

Information is complete:

Information is current:

No information comes from non-FCC sources:

Please explain any exceptions or clarifications:

As noted above, the information and activities covered by the LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN, are submitted as part of Congressional correspondence and inquiries. These Congressional correspondence and inquiries may include a constituent's PII as it concerns the FCC jurisdiction on telecommunications companies and activities, *i.e.*, complaints about telephone, cable, wireless service, billing disputes, *etc.* The OLA staff adheres to the Data Quality Guidelines in all responses to Congress

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?

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?

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?

The OLA staff does a continual review to insure that all Congressional correspondence, inquiries, and related matters have been completed within the three week time limit for responding to Congressional correspondence.

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:

All information that the LMTS information system collects, uses, and maintains is obtained from Congressional correspondence, including attachments. This correspondence may include inquiries concerning carrier billing or service complaints submitted by constituents; personnel actions or complaints from FCC employees; and other telecommunications, personnel issues, and other concerns, *etc.*, that require Congressional attention.

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 Legislative Management Tracking System (LMTS) information system, including the PII covered by FCC/OLA-1, “Legislative Management Training System (LMTS)” SORN, is a "stand alone" information system. It has no links to other FCC or non-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 LMTS information system is an essential component of the FCC's information systems. The FCC's Office of Legislative Affairs needs the LMTS information system to store and manage the receipt and Commission's responses to Congressional inquiries and related correspondence, which are submitted to the FCC by Senators and Representatives themselves and on behalf of their constituents.

- 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 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:

Members of Congress may e-mail, fax, or use regular USPS mail service to contact OLA with their inquiries. OLA uses the LMTS information system to log-in these inquiries and to track the Commission's responses, as appropriate.

If the information is collected by some method or mechanism other than the externally facing information system portal at www.fcc.gov or other URL, please skip to Question 5.11.

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

- Link to the FCC's privacy policies for all users:
- Privacy notice displayed on the webpage:
- 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 or other URL?

- Yes
- No

Please explain your response:

If the information is collected by some method or mechanism other than via the FCC Internet website at www.fcc.gov or the FCC Intranet for FCC employees and contractors working at the FCC, please skip to Question 5.14.

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

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

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

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

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.

- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—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:

If information is collected by some method or mechanism other than by fax, e-mail, FCC form(s), or regular mail, please skip to Question 5.16.

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

- Privacy notice is on the document, *e.g.*, FCC form, *etc.*
- Privacy notice displayed on the webpage where the document is located:
- Statement on the document notifies the recipient that they may read the FCC Privacy Notice at www.fcc.gov.
- Website or FCC document uses other method(s) to alert users to the Privacy Act Notice:
- Privacy notice is provided via a recorded message or given verbally by the FCC staff handling telephone calls:
- No link or notice, please explain why not: Senators and Representatives may use their own "privacy release" forms for their constituents' correspondence so that any PII, *i.e.*, SSNs, TINs, *etc.*, becomes the responsibility of the Senator or Congressional Representative. (OLA does not request PII.)
- 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:

Senators and Representatives mail their inquiries and correspondence to the FCC via regular USPS mail, which by-passes any FCC privacy notices at Commission portals.

If there is no access to the information system from outside the FCC via 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, does it identify ages or is it directed to people under 13 years old?

- Yes
- No

Please explain your response:

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

Yes
 No

Please explain your response:

The LMTS information system, including the PII covered by FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN, is used solely to track Congressional correspondence and related submissions.

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

Yes
 No

Please explain your response:

Individuals who send requests to their Senators and Congressional Representatives in reference to telecommunications issues and other matters concerning the FCC's statutory and regulatory responsibilities that they wished resolved, *i.e.*, billing and service disputes with their telephone and cable companies, *etc.*, and/or FCC employees with personal matters involving FCC personnel actions and complaints, *etc.*, determine as to how much PII they wish to include in their request, which is usually included as an attachment in the Congressional inquiry. Unless the PII is relevant to the Congressional inquiring, *etc.*, the OLA staff will redact any sensitive PII, *i.e.*, SSNs, birth dates, *etc.*, from any Congressional correspondence that they receive prior to scanning the correspondence into the LMTS's database.

- 5.19 Do individuals have the right to consent to particular uses of their personal information that pertain to the uses for which the FCC created this system of records?

Yes
 No

Please explain your response:

Individuals who send requests to their Senators and Congressional Representatives in reference to telecommunications issues that they wished resolved, *i.e.*, billing and service disputes with their telephone and cable companies, *etc.*, and complaints by FCC employees about personnel actions and complaints, *etc.*, determine how much PII they wish to include in their request to their Member of Congress. Unless the PII is relevant to the Congressional inquiry, *etc.*, the OLA staff will redact all sensitive PII, *i.e.*, SSN, birth date, *etc.*, from any Congressional correspondence that they receive.

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?

Individuals who send requests to their Member of Congress in reference to telecommunications issues that they wished resolved, *i.e.*, billing and service disputes with their telephone and cable

companies, *etc.*, and complaints by FCC employees about personnel actions and complaints, *etc.*, make the decision as to how much PII they wish to include in their request. Unless the PII is relevant to the Congressional inquiry, *etc.*, the OLA staff will redact all sensitive PII, *i.e.*, SSN, birth date, *etc.*, from any Congressional correspondence that they receive.

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

Individuals who send requests to their Member of Congress in reference to telecommunications issues that they wished resolved, *i.e.*, disputes with their telephone and cable companies, *etc.*, and complaints by FCC employees about personnel actions and complaints, *etc.*, make the decision as to how much PII they wish to include in their request. Unless the PII is relevant to the Congressional inquiring, *etc.*, the OLA staff will redact all PII, *i.e.*, SSN, birth date, *etc.*, from any Congressional correspondence that they receive.

- 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:

The OLA does not produce any reports on the correspondence contained in the LMTS information system.

Furthermore, this information system does not retain any PII that it receives as part of Congressional correspondence. The PII is only included as incidental information enclosed with Congressional correspondence. Unless the PII contained in the correspondence is relevant to the correspondence and/or inquiry, *i.e.*, account and/or billing data, addresses, *etc.*, it is redacted to protect the privacy of the individual who submitted the request to their Senator or Representative.

- 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 LMTS information system are required to complete privacy training. In addition the OLA staff provides various notices and admonitions to the employees and contractors who have access that the PII that the information 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
- Four years
- Five years
- Other: The OLA staff requires the security controls to be reviewed continually for the LMTS information system.

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 OLA staff requires that the personnel who use the LMTS information system receive training once a year on their responsibilities for protecting the PII contained in the LMTS information system. This is in addition to the FCC's agency-wide privacy training course which FCC employees and contractors were required to complete 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

Other re-certification procedures: The OLA staff as FCC's lead Congressional liaison issues continual reminders to its staff who use the LMTS information system, including FCC employees and contractors working at the FCC, that this information is "sensitive," that OLA is required to take measures to maintain its confidentiality, and that they are accountable for this information..

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 LMTS information system is a non-major information system, and as such, it is exempt from the FISMA training and security requirements.

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

5.30 What is the potential impact on individuals on whom the information is maintained in the information system(s) if unauthorized disclosure or misuse of information occurs? (check one)

Results in little or no harm, embarrassment, inconvenience, or unfairness to the individual.

Results in moderate harm, embarrassment, inconvenience, or unfairness to the individual.

Results in significant harm, embarrassment, inconvenient, or unfairness to the individual.

Please explain your response:

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 LMTS information system is used solely to track Congressional correspondence and the Commission's response as required. The changes to the LMTS information system will not result in the use of technology in ways that the FCC has not done previously.

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

The LMTS information system is used solely to track Congressional correspondence and the Commission's response as required. OLA routinely redacts any sensitive PII, *i.e.*, SSN, birth date, *etc.*, that is included in the attachments to this correspondence that is not deemed to be relevant to the Congressional correspondence or inquiry. Thus, the LMTS information system's technology has very little impact or effects on the privacy of those individuals included in any Congressional inquiries or the FCC employees and contractors who operate LMTS information system.

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 LMTS information system is used solely to track Congressional correspondence and the Commission's response as required, it has no ability to identify, locate, and/or monitor individuals.

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 this system of records notice (SORN) require non-FCC employees and contractors to perform any paperwork or recordkeeping activities?

Yes, individuals, who are not FCC employees or contractors, are required to complete paperwork or recordkeeping functions or activities, *i.e.*, fill out forms and/or licenses, participate in surveys, and or maintain records *etc.*

Please explain your response:

No, individuals, who are not FCC employees or contractors, are not required to perform any paperwork or recordkeeping functions or activities

Please explain your response:

The LMTS information system is used solely to track Congressional correspondence and the Commission's response as required.

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

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

Yes

No

Please explain your response:

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

6.3 If 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):

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:

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 the LMTS information system, which is covered by the FCC/OLA-1, “Legislative Management Tracking System (LMTS)” SORN, contains information about them may address their inquiries to the system manager in the Office of Legislative Affairs (OLA). 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 the LMTS information, which is covered by FCC/OLA-1, “Legislative Management Tracking System

(LMTS)” SORN may contact the system manager in the Office of Legislative Affairs (OLA). 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 them in the LMTS information system, which is covered by FCC/OLA-1, “Legislative Management Tracking System (LMTS)” SORN, may contact the the system manager in the Office of Legislative Affairs (OLA). 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 the LMTS information system, which is covered by FCC/OLA-1, “Legislative Management Tracking System (LMTS)” SORN, may contact the system manager in the Office of Legislative Affairs (OLA) who will explain the alternatives that are available to the individual. 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:

- 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/OLA-1, "Legislative Management Tracking System (LMTS)" SORN, which covers the PII that may be included in attachments to Congressional correspondence that Senators and Representatives include in their correspondence to the Commission. The FCC/OLA-1, "Legislative Management Tracking System (LMTS)" SORN does not 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, which is consistent with FCC rules under 47 CFR §§ 0.561.

- 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 OLA staff routinely redacts any sensitive PII, *i.e.*, SSN, birth date, *etc.*, that is included in any attachments to the Congressional correspondence it receives that is not deemed to be relevant to the correspondence or inquiry. By redacting this PII, the OLA staff believes that it has taken adequate precautions to protect the PII of individuals whose information may be included in this correspondence.

In addition, the OLA staff remains vigilant about this PII, and the FCC computer network databases that hold this information and the file cabinets that contain the paper document files have the proper security measures to protect the information.

Furthermore, the OLA supervisory staff issues periodic reminders to those who work with this PII or who are granted access that the information in the LMTS information systems's electronic records and paper files is "non public for internal use only" and that they are to keep the information confidential and to refrain from making any unauthorized disclosure of information.

- 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
- Four years
- Five years
- Other audit scheduling procedure(s): While no formal audit is required, as noted in Question 4.5, the OLA staff does a continual review to insure that all Congressional correspondence, inquiries, and related matters have been completed within the three week time limit for responding to Congressional correspondence.

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:

There is no public access to the LMTS information system.

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?

Risks:	Mitigating factors:
a. Some of the LMTS information system's PII includes paper documents and records that are stored in file cabinets.	a. PII that is contained in the paper documents, records, and files are stored in file cabinets in the OLA office suite. Also, the PII in the Congressional correspondence is redacted from these documents unless it is deemed relevant to the correspondence or inquiry.
b. Some of the LMTS information system's PII includes electronic records and data that are stored in the FCC's computer network databases.	b. PII that is contained in electronic records and data is protected in the FCC's computer network databases, which require users to provide login's and access rights to these records.

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

Initial implementation: 1999
 Secondary implementation: 2006
 Tertiary implementation: January 2009

Other implementation:

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

- Yes
 No

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

At this time, OLA does not anticipate that there will be any new ancillary or auxiliary information systems linked to the LMTS information system.