

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



**Privacy Impact Assessment<sup>1</sup> (PIA) for the  
Telephone Call Details**

**August 19, 2009**

**FCC Bureau/Office:** Office of Managing Director (OMD)  
**Division:** Associate Managing Director, Information Technology (AMD-ITC)

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

---

<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 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: March 2009

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

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

Please explain your response:

The Associate Managing Director, Information Technology Center (AMD-ITC) is making various minor revisions to the Telephone Call Details information system, including the personally identifiable information that is covered by the system of records notice (SORN) OMD-18, "Telephone Call Details." ITC has upgraded various parts of this information system and added a routine use, "breach notification," as required by OMB Memorandum M-07-16 (May 22, 2007).

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

- Yes  
Date:
- No

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

This system of records notice pre-dates the OMB requirements contained in OMB Memorandum M-03-22 (September 22, 2003) that created the Privacy Impact Assessment requirements.

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:

The information system that is covered by this system of records notice, FCC/OMD-18, "Telephone Call Detail" SORN, was originally part of another FCC system of records notice, FCC/Central-8, "Telephone Call Detail and Telephone Call Detail." The Commission created a new SORN for the Telephone Call Detail, FCC/OMD-18, "Telephone Call Detail," which was published in the *Federal Register* on April 5, 2006, *see* 71 FR 17234, 17262.

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:

The ITC staff have made only minor updates to the operating system, *etc.*, for the Telephone Call Detail information system.

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:

The Telephone Call Details information system contains the monthly records of the Commission's telephone call billing records for its landline telephone, cellular phones, and related equipment, *i.e.*, Blackberries, *etc.*, which are sent to the FCC by the vendors (telephone companies and the General Services Administration (GSA)):

ITC has responsibility for reviewing the telephone call detail information.

The monthly telephone call detail information is shared with the Financial Systems Operations Group (FSOG) in the Associate Managing Director - Financial Operations (AMD-FO).

AMD-FO also receives the credit card payment information for the Enforcement Bureau (EB) (including EB field offices) and the Public Safety and Homeland Security Bureau (PSHSB) which pay their own wireline and cellular telephone charges.

The management staff in the bureaus and offices receive information on any of their staff who abuse their telephone calling privileges.

This information system is a "stand alone" information system, *e.g.*, it has no electronic links to other FCC or non-FCC information system.

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: The information includes: (1) telephone calls (wireline or cellular) originating from the individuals at the FCC (including current and former FCC employees); (2) FCC employees placing telephone calls to or charging calls to FCC telephones (wireline or cellular); (3) FCC employees receiving telephone calls, or accepting the charges for such calls; and (4) FCC employees who are assigned FCC telephone numbers (wireline and/or cellular).

**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: The information includes: (1) telephone calls (wireline or cellular) originating from current or former contractors at the FCC; (2) contractors placing telephone calls to or charging calls to FCC telephones (wireline or cellular); (3) contractors receiving telephone calls or accepting the charges; and (4) contractors who are assigned FCC telephone numbers (wireline and/or cellular).

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

- Not applicable
- Individual's name:
  - Other name(s) used, *i.e.*, maiden name, *etc.*
  - FCC badge number (employee ID)
  - SSN:
  - Race/Ethnicity
  - Gender
  - Citizenship
  - Non-U.S. Citizenship
  - Biometric data
    - Fingerprints
    - Voiceprints
    - Retina scans/prints
    - Photographs
    - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age:
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records

- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: The information includes: (1) telephone calls (wireline or cellular) originating from current or former FCC interns, co-op students, temporary hires, and volunteers; (2) these individuals placing telephone calls to or charging calls to FCC telephones (wireline or cellular); (3) these individuals receiving telephone calls or accepting the charges; and (4) these individuals who are assigned FCC telephone numbers (wireline and/or cellular).

**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: The information includes: (1) telephone calls (wireline or cellular) originating from visitors or other non-FCC employees; (2) these individuals placing telephone calls to FCC telephones (wireline or cellular); and (3) these individuals receiving telephone calls from FCC.

1.9 What are the sources for the information that you are collecting:

- Personal information from FCC employees: current and former full and part-time FCC employees, interns, volunteers, temporary hires, co-op students, and visitors.
- Personal information from FCC contractors:
- Personal information from non-FCC individuals and/or households: Individuals who use FCC telephones or receive calls from FCC employees, staff, and/or contractors.

- 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: GSA provides telephone calling data, calling charges and associated fees, *etc.*.
- 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:

The Telephone Call Detail information system contains information concerning the Commission's telephone calls (wireline and cellular) that are placed by, received by, charged by FCC employees, interns, co-op students, volunteers, and temporary hires, and contractors working at the FCC; and information on these individuals who are assigned FCC telephone numbers (wireline and/or cellular).

This information comes from the providers (telephone companies and the General Services Administration (GSA)) and is shared with the FCC's Financial Office in the Office of Managing Director (OMD-FO) and the FCC's field offices.

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): Telephone service providers, *e.g.*, telephone companies and the GSA
- 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: Telephone providers' (telephone companies and the GSA) records and data concerning: (1) telephone calls originating from the individuals at the FCC (including current and former FCC employees); (2) FCC employees placing telephone calls to or charging calls to FCC telephones (wireline or cellular); and FCC employees receiving telephone calls, or accepting the charges for such calls.

**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:

When the ITC and FO staffs work together to review telephone charges and usage that require consultation with the FCC's bureaus and offices, the staffs send e-mails to the B/O's managers to request clarification about whether telephone charges and/or usages are appropriate and accurate, *etc.* If the ITC staff determines that the charge and/or use is inappropriate, the FCC employee must pay for this telephone call.

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 (personal) telephone number, fingerprint, voice print, *etc.*?

- Yes
- No

Please explain your response:

The FCC's telephone bill is organized by FCC telephone numbers.

By using the telephone number data, the ITC and FO staffs can perform a "reverse search" that can identify the name of the individual who is assigned that telephone number of the telephone (wireline or cellular) used to make the call.

The telephone number that was called can be further identified and associated with other individuals, *i.e.*, the individual's family, business associates, *etc.*

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:

The ITC staff destroys the telephone records data once each telephone bill has been reconciled and paid, since there is no longer a valid reason to maintain this information.

However, there is a possibility that repeat violations could cause an adverse personnel action against an individual.

(The FO staff retains the telephone records for reference purposes for six years.)

- 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): This system of records notice, FCC/OMD-18, "Telephone Call Detail," was published in the *Federal Register* on April 5, 2006.

Please provide the citation that was published in the *Federal Register* for the SORN: 71 FR 17234, 17262.

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:

What is the System of Records Notice (SORN) of which it is currently or 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

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 is the location of the information covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

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

- Yes
- No

Please explain your response:

1.24 What are 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:

1.25 What is 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:

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

- Yes
- No

Please explain your response:

1.27 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,"<sup>2</sup> 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:
- Others "third party" disclosures:

---

<sup>2</sup> 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

1.28 Will the information be disclosed to consumer reporting agencies?

- Yes  
 No

Please explain your response:

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

1.30 How is information in this system retrieved?

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 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:

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 the Telephone Call Detail information center and to the personally identifiable information (PII) that it collects, uses, and maintains, which is covered by FCC/OMD-18, "Telephone Call Detail" SORN.

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:

The information, including the PII that is covered by FCC/OMD-18, "Telephone Call Detail" SORN, is located in the Associate Managing Director - Information Technology Center (AMD-ITC) and in the Associate Managing Director - Financial Operations (AMD-FO) in the Office of Managing Director (OMD), Federal Communications Commission (FCC), 445 12<sup>th</sup> Street, S.W., Washington, DC 20554.

Information may also be found in the effected FCC's Enforcement Bureau 26 field offices.

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 that are covered by FCC/OMD-18, "Telephone Call Detail" SORN, include:

- (1) Individuals (including current and former FCC Employees, interns, co-op students, volunteers, temporary hires, visitors, and contractors working at the FCC) who originate calls from FCC telephones (wireline or cellular), and individuals receiving such calls;
- (2) Individuals who place calls to or charge calls to FCC telephones (wireline or cellular);
- (3) Individuals who receive such telephone calls from FCC telephones (wireline or cellular), or accept the charges for such calls; and
- (4) FCC employees, interns, co-op students, temporary hires, volunteers, visitors, and contractors working at the FCC who are assigned FCC telephone numbers (wireline and/or cellular).

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, including the PII that is covered by FCC/OMD-18, "Telephone Call Detail" SORN, include:

- (1) Records of telephone calls placed to and from FCC telephones (wireline and cellular);
- (2) Telephone numbers (wireline and cellular) assigned to current FCC employees, interns, co-op students, temporary hires, volunteers, and contractors working at the FCC;
- (3) The physical location of FCC telephones (wireline and cellular);
- (4) Telephone numbers called from, the numbers called to, time and date of calls, duration, disposition, and the cost of the telephone call and/or charges accepted, and the FCC organizational unit (bureau/office) to which the relevant telephone numbers are assigned;
- (5) Copies of related records, *e.g.*, any periodic summaries that may have been compiled to reflect the total number of long distance calls, *etc.*; and
- (6) Names of current and former FCC employees, interns, co-op students, temporary hires, volunteers, contractors working at the FCC, and visitors and other non-FCC related individuals, *i.e.*, individuals doing business at the FCC, and their office/workstation location.

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:

The legal authorities for maintenance of the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, are 44 U.S.C. 3101 and 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 purposes for collecting maintaining, and using the information, including PII that is covered by FCC/OMD-18, "Telephone Call Detail" SORN, are:

- (1) to account for the information contained in the telecommunications bill for the FCC's telephones, cellular phones, and telephone services;
- (2) to allow the FCC to meet its statutory and regulatory duties to ensure that government property is used only for its allowed purposes, *e.g.*, to insure that the FCC is re-imbursed for telephone calls and services that were not made specifically for Commission business purposes; and
- (3) to ensure that the FCC operates efficiently and effectively.



2.7 Have there been any changes to the “Routine Uses”<sup>3</sup> 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 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: OMB Memorandum M-07-16 (May 22, 2007).
- 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) is to be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

Information in the Telephone Call Detail information system is not disclosed to any 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 in the Telephone Call Detail information system, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, includes:

---

<sup>3</sup> 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

- (1) electronic records and data that are stored in the FCC's computer network databases, individual's PC C:\ and/or network N:\ drive(s), and CD ROMS. The electronic records and data are protected by the FCC network security protocol; and
- (2) faxes and other paper documents, files, and records, *e.g.*, monthly telephone bills and related documents, *etc.*, which are stored in file cabinets in "non public" rooms in the EB Field, ITC and FO office suites. The file cabinets are locked when not in use. The storage rooms that are locked at the close of the business day.

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, *e.g.*, electronic records and data and the paper documents, in the Telephone Call Detail information system, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, is retrieved by searching electronically by FCC employee, intern, co-op student, temporary hire, volunteer, contractor, and/or visitor or businessperson's name, name of telephone call recipient, and/or telephone number.

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 information, *e.g.*, electronic records and data and the paper records and files, *etc.*, in the Telephone Call Detail, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, is restricted to supervisors and staff in ITC's Planning and Support Group and FO's Financial Systems Operations Group who review and process the call detail information. Other FCC employees and contractors may be granted access on a "need to know" basis as dictated by their job duties and responsibilities.

The electronic records and data (including CD-Rs and CD-ROMs) are maintained in the FCC's computer network databases, which are secured through controlled access and passwords restricted to administrative staffs in ITC and FO and the effected FCC field offices. The information that is resident on network servers (electronic records and data) is backed-up daily to magnetic media. Back-up tapes are stored on-site and at an off-site storage location.

The paper documents and files are stored in file cabinets that are locked when not in use. The file cabinets are located in non-public rooms in the FO office suite. These rooms that are locked at the close of the business day.

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:

ITC maintains the information, including the paper documents and files, CDs, and electronic records and data (including downloads from GSA website), which is covered by FCC/OMD-18, "Telephone Call Detail" SORN, in accordance with the General Records Schedule 12 issued by the National Archives and Records Administration (NARA). Most records are retained for six months to three years, although some records are kept for six years, depending upon the Schedule 12 requirements. All monthly telephone records are sent to NARA--none are destroyed.

Paper documents disposition is by shredding, and electronic records and data are destroyed physical destruction (electronic storage media) or by electronic erasure.

Individuals may request a copy of the Schedule 12 disposition instructions from the FCC Privacy Officer or directly access Schedule 12 at: <http://www.archives.gov/records-mgmt/ardor/grs12.html>.

### 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: Enforcement Bureau's 26 field offices.

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 ITC and FO supervisors and staffs have responsibility for access and proper use of the information in the Telephone Call Detail 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 information in the Telephone Call Details information system, including the electronic records and data stored in the FCC's computer network databases and the paper documents, files, and records, is restricted to the ITC, FO, and EB Field Office staffs. Other FCC employees and contractors working at the FCC may be given access on a "need to know" 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 ITC, FO, and the EB Field Offices 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: ITC supervisors.
- Information system administrators: ITC staff, including both FCC employees and contractors, who manage the IT systems that hold and process the PII.
- Information system developers:
- FCC staff in this bureau/office: FCC employees in ITC, FO, and the EB Field Offices are granted access on a "need to know" basis.
- FCC staff in other bureaus/offices:
- FCC staff in other bureaus/offices in FCC field offices:
- 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 ITC 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 the contractors who are associated with the Telephone Call Details information system, including the PII covered by FCC/OMD-18, "Telephone Call Details" SORN, include the required 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 (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:

The Telephone Call Detail information system, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, is a "stand alone" information system. It has no links to any other FCC or non-FCC network 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:

3.16 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?”

3.17 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 contained in the Telephone Call Detail information system, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, is collected via the FCC's telephone

network information system whenever any individual makes a telephone call, receives a telephone call using the FCC's telephones (wireline and cellular) and when an individual charges a telephone call to the FCC or accepts telephone call charges for the FCC.

This information system also collects this telephone call detail data from calls related to FCC telephone numbers that are assigned to FCC employees, interns, co-op students, temporary hires, visitors, and contractors working at the FCC.

The Commission believes that the telephone call detail data meet the Data Quality guidelines. The FCC will investigate will investigate any discrepancies in these data.

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:
  - 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:

The Telephone Call Detail information system only collects data, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, which are related to telephone usage of FCC telephones (wireline and cellular) and related equipment, *i.e.*, Blackberries, *etc.*

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 ITC staff does monthly reviews of the information contained in the Telephone Call Detail information system, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, to insure that the information is accurate and that there is no improper use of the FCC's telephone services, improper charges, *etc.*

The FO staff reviews the monthly telephone bills sent to the FCC by the vendors (telephone providers and GSA) and the EB field offices to insure that the charges and credit card payments that FO pays are accurate and complete.

### 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 Telephone Call Detail information system collects, uses, and maintains, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, is obtained from the data collected via FCC internal telephone network users and related transmission links, *i.e.*, telephone calls made from outside the FCC and telephone calls that are charged to the FCC that were made from outside.

- 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:

As noted in Question 1.6, the Telephone Call Detail information system, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, is a "stand alone" information system with no links to either 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 Telephone Call Detail information system performs a necessary a function for the Commission. This information system provides the data that the FCC's ITC staff uses to keep track of telephone calls made by FCC staff, *i.e.*, employees, interns, co-op students, and temporary hires, contractors working at the FCC, and visitors to the FCC, who use FCC telephones (wireline and cellular), telephone calls charged to FCC telephones (wireline and cellular), telephone call charges accepted by FCC staff and contractors, and FCC telephone numbers assigned to FCC staff and contractors. This recordkeeping function is necessary for the FCC to meet its statutory and regulatory duties:

- (1) to insure that government property is used only for allowed purposes, *i.e.*, that telephone calls are only made within the guidelines of FCC regulations ("proper behavior") and that there is a proper accounting for telephone charges, *etc.*, and
- (2) to ensure that the FCC operates efficiently and effectively.

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:

The Telephone Call Detail information system only collects data from telephone calls, including both wireline and cellular phones and related equipment, *i.e.*, Blackberries, *etc.* There is no Internet access.

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

5.9 If the information is collected via [www.fcc.gov](http://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](http://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](http://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), 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.* FCC Form 201, "Computer System User Rules of Behavior."
- 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](http://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:
- 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:

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 FCC's Telephone Call Detail information system, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, is used solely to keep track of the telephone calls that are made using FCC telephones, telephone calls charged to FCC telephones, telephone calls accepted by FCC staff (including FCC employees, interns, co-op students, temporary hires, volunteers, and visitors, *etc.*) and contractors, and FCC telephone numbers (wireline and cellular) assigned to FCC staff, and to make a proper accounting of the charges for these telephone calls.

There is a possibility that repeat violations could cause an adverse personnel action against an individual.

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

Yes

No

Please explain your response:

FCC staff (including FCC employees, interns, co-op students, temporary hires, volunteers, and visitors, *etc.*) and contractors who use FCC telephones, charge telephone calls to FCC telephones, accept telephone call charges for the FCC, and/or are assigned FCC telephone numbers must provide the requisite information to receive permission to use FCC telephones to make calls, *etc.* The requested information is minimal and is necessary for the proper functioning of this information system.

Individuals who failed to provide this information would not be allowed to use FCC telephones or to make, receive, charge, accept telephone call charges, or be assigned FCC telephone numbers for wireline or cellular telephones.

The FCC requires every employee, intern, co-op student, temporary hire, and contractor, *etc.* to sign the "Rules of Behavior" that governs their use of the FCC's telephone equipment and services.

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

- Yes  
 No

Please explain your response:

Individuals do not have the right to consent to particular uses of their PII because such information is necessary for the Telephone Call Detail information system to function properly. This information system is authorized under the FCC's statutory and regulatory authority to protect and to account for government-issued FCC telephones(wireline and cellular) and to regulate the uses and charges related to the use of FCC telephones (wireline and cellular).

The FCC can only comply with these responsibilities if this information system has the requisite PII of those who are using FCC telephones, receiving telephone charges, *etc.*, for wireline and cellular telephones.

As noted above, the FCC requires every employee, intern, co-op student, temporary hire, and contractor, *etc.* to sign the "Rules of Behavior" that governs their use of the FCC's telephone equipment and services.

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:

The Telephone Call Details information system does not produce any reports on any PII pertaining to telephone users. The purposes for collecting maintaining, and using the information, including PII that is covered by FCC/OMD-18, "Telephone Call Detail" SORN, are:

- (1) to account for the information contained in the telecommunications bill for the FCC's telephones, cellular phones, and telephone services;
- (2) to allow the FCC to meet its statutory and regulatory duties to ensure that government property is used only for its allowed purposes, e.g., to insure that the FCC is re-imbursed for telephone calls and services that were not made specifically for Commission business purposes; and

(3) to ensure that the FCC operates efficiently and effectively.

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 PII that is collected, used, stored and maintained in the Telephone Call Detail information system are required to complete privacy training. In addition the ITC staff provides various notices and warnings to the employees and contractors who have access that the PII is not to be shared or disclosed without authorization.

5.25 How often are security controls reviewed?

- Six months or less:
- One year: The ITC staff reviews the security controls in the Telephone Call Detail information system at least annually.
- Two years
- Three years
- Four years
- Five years
- Other:

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:
- Two years
- Three years
- Four years
- Five years
- Other: In September 2006, the FCC inaugurated a Commission-wide privacy training program, which has required all FCC employees and contractors to complete an initial privacy training course and to take a refresher course each year thereafter, as required by the Office of Management and Budget.

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: The ITC staff requires that the personnel who use the information system, including FCC employees and contractors working at the FCC, must be trained at least once a year on their responsibilities for protecting the PII contained in the Telephone Call Detail information system.
- Two years
- Three or more years
- Other re-certification procedures:

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 Telephone Call Details information system is a "non-major" information system, and as such, it is exempt from the FISMA 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:

The Telephone Call Detail information system requires individuals who use FCC telephones, accept calls on FCC telephones, charge telephone calls to FCC telephones, accept charges for FCC telephones, and/or are assigned FCC telephone numbers (including both wireline and cellular telephones) to provide very little personally identifiable information, *i.e.*, SSNs and TINs are not required.

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:

The Telephone Call Detail information system is a "non major" information system, and as such, it is exempt from the FIPS 199 assessment guidelines.

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:

The Telephone Call Details information system is a "non-major" information system, and as such, it is exempt from the Certification and Accreditation requirement.

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: The Telephone Call Details information system is a "non-major" information system, and as such, it is exempt from the independent risk assessment, independent security test and evaluation, and other risk assessment and security testing procedures.

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 ITC staff is making only minor, non-substantive changes to FCC/OMD-18, "Telephone Call Detail" SORN, which covers the PII that is collected, used, and maintained by the Telephone Call



Detail information system. These changes do not include any new technologies or modifications to existing information technology that the Commission has not used previously.

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

FCC staff (including FCC employees, interns, co-op students, volunteers, visitors, and temporary hires) and contractors working at the FCC are required to provide certain PII that allows the Commission to regulate the use of FCC telephones (wireline and cellular) and who makes calls, receives calls, accepts charges for calls using FCC telephones, and/or who are assigned FCC telephone numbers. The FCC requests this information, as required by statutory and regulatory authorities, so that the FCC can maintain its records of which the telephone usage of its telephone system.

As noted elsewhere, the FCC requires every employee, intern, co-op student, temporary hire, and contractor, etc. to sign the "Rules of Behavior" that governs their use of the FCC's telephone equipment and services each employee, intern, co-op student, and contractor must sign the FCC's "Rules of Behavior" .

- 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 Telephone Call Detail information system is used exclusively to account for the usage and charges for the FCC's telephone network. This information system does not include any capability 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:

- 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 Telephone Call Detail information system, which is covered by the FCC/OMD-18, “Telephone Call Detail” SORN, contains information about them may address their inquiries to the system manager, Associate Managing Director, Information Technology Center (AMD-ITC). 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 Telephone Call Detail information system, and which is covered by FCC/OMD-18, “Telephone Call Detail” SORN, may address their inquiries to the system manager, Associate Managing Director, Information Technology Center (AMD-ITC). 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 Telephone Call Detail information system, which is covered by FCC/OMD-18, “Telephone Call Detail” SORN, may address their inquiries to the system manager, Associate Managing Director, Information Technology Center (AMD-ITC). 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 Telephone Call Detail information system, which is covered by FCC/OMD-18, "Telephone Call Detail" SORN, may address their inquiries to the system manager, Associate Managing Director, Information Technology Center (AMD-ITC). 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 categories of records in the FCC/OMD-18, "Telephone Call Detail" SORN, which covers the PII that is collected, used, and maintained by the Telephone Call Detail information system remain unchanged. These record sources include telephone assignment records; telephone call detail listings; and the results of administrative inquiries relating to assignment of responsibility for placement of specific long distance telephone calls, *etc.*

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/OMD-18, "Telephone Call Detail" 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 ITC supervisory staff issues periodic reminders to its employees and contractors that the information in the Telephone Call Detail information system's electronic records and databases and paper documents and files, including the PII covered by FCC/OMD-18, "Telephone Call Detail" SORN, are "non public for internal use only." The ITC supervisors also notify those

granted access to the information that they are to keep the information confidential and to safeguard it from unauthorized disclosure.

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): The ITC and FO staffs do monthly reviews of the information in the Telephone Call Detail information system, including the PII that is covered by FCC/OMD-18, "Telephone Call Detail" SORN, to insure that all charges and credit card payments are accurate and accounted for. These reviews obviate the need for a yearly audit.

**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. Some of the information system's personally identifiable information (PII) includes paper documents and files that are stored in file cabinets.	a. PII that is contained in the paper documents and files are stored in locked file cabinets, which are located in rooms that are locked when not in use.
b. Some of the information system's personally identifiable information (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 log-ins and access rights to these records.
c. The Telephone Call Detail information system includes data that are collected from the telephone and cellular telephone companies. The FCC may need to verify that the information it collects from these non-FCC sources meets Data Quality guidelines.	c. ITC needs to have security and other measures in place to safeguard the information and to insure that it meets the data quality guidelines and other security benchmarks.

9.2 What is the projected production/implementation date for the information system:

Initial implementation: April 2006  
 Secondary implementation: March 2009  
 Tertiary implementation:  
 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, the ITC staff does not anticipate that there will be any new ancillary or auxiliary information systems linked to the Telephone Call Detail information system.