

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



**Privacy Impact Assessment<sup>1</sup> (PIA) for the  
FCC Employee Transit Benefit and Parking Permit Programs  
March 31, 2008**

**FCC Bureau/Office:** Office of the Managing Director  
**Division:** Administrative Operations (OMD-AO)

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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.

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

Having established through the **Privacy Threshold Assessment** that this information system contains information about individuals, *e.g.*, personally identifiable information (PII), it is important that when the FCC makes changes to such an information system, the FCC then analyzes:

- (a) What changes are being made to the information that the system presently collects and maintains; and/or
- (b) What new information will be collected and maintained to determine the continuing impact(s) on the privacy of the individuals.

The Privacy Impact Assessment template's purpose is to help the bureau/office to evaluate the changes in the information in the system and to make the appropriate determination(s) about how to treat this information, as required by the Privacy Act's regulations.

**Section 1.0 Information System's Contents:**

1.1 Status of the Information System:

- New information system—Development date:
- Revised or upgraded information system—Revision or upgrade date: March 2008

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

- Placed in existing information system—Implementation Date: March 2008
- Placed in new auxiliary/ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

This information system is being revised to update information about the transit benefits and parking permit programs and to add the new breach notification routine use, as required by OMB Memorandum m07-16 (May 22, 2007).

1.2 Has a Privacy Threshold Assessment been done?

- Yes  
Date:
- No

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

This information system has a system of records notice (SORN) that pre-dates the implementation of the Privacy Impact Assessment requirement.

If the Privacy Threshold Assessment (PTA) has been completed, please skip to Question 1.15

1.3 Has this information system, which contains information about individuals, *e.g.*, personally identifiable information (PII), existed under another name, *e.g.*, has the name been changed or modified?

- Yes
- No

If yes, please explain your response:

1.4 Has this information system undergone a “substantive change” in the system’s format or operating system?

- Yes
- No

If yes, please explain your response:

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

1.5 Has the medium in which the information system stores the records or data in the system changed from paper files to electronic medium (computer database); or from one electronic information system to another, *i.e.*, from one database, operating system, or software program, *etc.*?

- Yes
- No

If yes, please explain your response:

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

- Yes
- No

If yes, please explain your response:

The FCC Employee Transit Benefit and Parking Permit Program is a "stand alone" information system, *e.g.*, it is not linked to any other FCC information systems. The Washington Metropolitan Transit Authority (WMATA) maintains a separate information system that manages the Smartrip rider program, which contains information on those who use the Smartrip card to ride the metro and bus systems, including FCC employees who participate in the transit benefit subsidy program. Republic Properties and their contractor, Siemens, maintain a "stand alone" information system that manages the information on those who participate in the Portals II garage parking permit program.

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.*: Name change(s).
- SSN
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Finger prints
  - Voice prints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data: Documents needed to verify handicap status.
- Marital status
- Spousal information
- Miscellaneous family information
- Home address: Address changes.
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Emergency contact data:
- Credit card number(s)
- Driver's license
- Bank account(s): FCC employees may chose to have their monthly transit benefit subsidy deposited into their bank account.
- Personal e-mail address(es)
- FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- FCC badge number (employee ID): Badge number changes.
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: FCC employment status, *e.g.*, bargaining unit employee, non-bargaining unit employee, FTC (full time employee), part time employee, and/or title (executives only); FCC employees who park in the Portals II garage must provide their automobile vehicle registration number, vehicle license plate number, and a description of their vehicle; WMATA Smartrip Card Serial Number(s) (old and new, as applicable); FCC employee's bureau/office, room number, telephone number, and signature; and transportation mode(s) and commuting costs.

**Information about FCC Contractors:**

- No FCC contractor information
- Contractor's name

- Other name(s) used, *i.e.*, maiden name, *etc.*: Name change(s).
- SSN
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
  - Finger prints
  - Voice prints
  - Retina scans/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data: Documents needed to verify handicap status
- Marital status
- Spousal information
- Miscellaneous family information
- Home address: Address changes.
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s):
- Personal e-mail address(es)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- FCC Contractor badge number (Contractor ID): Badge number changes.
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: FCC contractors who park in the Portals II garage must provide their state and automobile license plate number, vehicle license plate number, and a description of their vehicle, *i.e.*, year, make, and model; FCC phone number, contractor's signature.

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

- Not applicable
- Individual's name:
- Other name(s) used, *i.e.*, maiden name, *etc.*: Name changes.
- 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: documents need to verify handicap status
- Marital status
- Spousal information
- Miscellaneous family information
- Home address: Address changes.
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s): FCC paid interns and co-op students may chose to have their monthly transit benefit subsidy deposited into their personal bank account.
- Personal e-mail address(es)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- FCC badge number (employee ID): Badge number changes.
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information: FCC employment status, *e.g.*, paid intern or co-op student; FCC paid interns and co-op students who park in the Portals parking garage must provide information on their automobile, *i.e.*, vehicle registration number, license plate number, and description of their vehicle. Each individual who is not an FCC employee, contractor, or paid intern or student, but who is a member of a carpool/vanpool must provide his/her name, address, phone number, and signature.

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

- Not applicable
- Name of business contact/firm representative
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Job description
- Professional affiliations
- Partial SSN
- 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: FCC employees must provide information about their work commute, *e.g.*, origin and destination of their commute, so that the FCC and the Washington Metropolitan Area Transit Authority (WMATA) can calculate the monthly transit benefit payment to which they are entitled. FCC employees who park in the Portals II parking garage must provide information on their vehicle; and medical data proving handicap status (as applicable).
- Personal information from FCC contractors: medical data proving handicap status (as applicable) and personally identifiable information and vehicle information for parking permit purposes.
- Personal information from non-FCC individuals and/or households: carpool/vanpool riders must provide personally identifiable information for parking permit purposes, and handicap status (as applicable).
- 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:

The transit benefits information system is a "stand alone" database, *e.g.*, it is not linked to any other FCC or non-FCC information systems. It stores information about each FCC employee, paid intern, and co-op student who participates in this program, including his/her FCC badge ID, bureau/office, room number, home address, and commute-to-work route (origin and destination). The commuting cost information is used to verify the monthly transit benefit subsidy to which the participant is entitled. The Republic Properties and Siemens maintain a parking permit database is also a "stand alone" information system without links to any other FCC or non-FCC

information systems. It stores information about each FCC employee, paid intern, executive, co-op student, and contractor who is issued a vehicle parking permit, their handicap status (when applicable), and/or carpool/vanpool participants, as applicable. This information is used to monitor the use of the Portals II garage, *i.e.*, ingress and egress, handicap parking zones, executive parking zones, *etc.*

If the information system does not use any PII from other 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?

- Names:
- SSN
- Citizenship:
- Biometric data
  - Finger prints
  - Voice prints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data: documents to verify handicap status.
- Marital status
- Spousal information
- Miscellaneous family information:
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s):
- Personal e-mail address(es)
- Non-FCC personal employment records
- Non-FCC government badge number (employee ID)
- Law enforcement data
- Military records
- National security data
- Communications protected by legal privileges
- Financial history
- Foreign countries visited
- Background investigation history
- Digital signature
- Consumer/customer name
- Consumer/customer SSN
- Consumer/customer address
- Consumer/customer birthday/age
- Consumer/customer telephone number(s)

- Consumer/customer cell phone number(s)
- Consumer/customer telephone/cell phone/fax account number(s)
- Other information: Republic Properties and Siemens information systems store data about those who have been issued a parking permit, including handicap status (as applicable), vehicle make/model, state and license plate number, executive status, and vanpool and carpool verification, *etc.*

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

- Not applicable
- Name of business contact/firm representative
- Business/corporate purpose(s)
- Job description
- Professional affiliations
- Partial SSN
- 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)
- Race/Ethnicity
- Gender
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information:

1.12 Will this information system derive new information, records, or data, or create previously unavailable information, records, or data, through aggregation or consolidation from the information that will now be collected via this link to the other system, including information, records, or data, that is being shared or transferred from the other information system(s)?

- Yes
- No

Please explain your response:

1.13 Can the information, whether it is: (a) in the information system, (b) in a linked information system, and/or (c) transferred from another system, be retrieved by a name or a “unique identifier” linked to an individual, *e.g.*, SSN, name, home telephone number, fingerprint, voice print, *etc.*?

- Yes
- No

Please explain your response:

The FCC can obtain personally identifiable information (PII) about FCC employees, contractors, paid interns, co-op students, and carpool/vanpool riders, who participate in the Portals II garage parking permit program from the Republic Properties and Siemens, which maintained the parking permit data.

- 1.14 Will the new information include: (a) personal information about individuals, *e.g.*, personally identifiable information (PII); (b) be included in the individual's records; or (c) be used to make a determination about an individual?

- Yes  
 No

Please explain your response:

The PII is used to determine whether an FCC employee, paid intern, or co-op student may participate in either the transit benefit subsidy program or the parking permit program. The PII is used to verify: (a) how much of a transit subsidy the individual is entitled to receive, based on the commute-to-work information the individual has provided to WMATA; or (b) the type of parking permit the FCC employee, contractor, paid intern, co-op student, or carpool/vanpool rider may be issued, *i.e.*, handicap parking permit, executive parking permit, vanpool or carpool permit, *etc.*

- 1.15 Under the *Privacy Act of 1974*, as amended, 5 U.S.C. 552a, Federal agencies are required to have a System of Records Notice (SORN) for an information system like this one, which contains information about individuals, *e.g.*, "personally identifiable information" (PII).

A System of Records Notice (SORN) is a description of how the information system will collect, maintain, store, and use the personally identifiable information (PII).

Is there a SORN that already covers this PII in this information system?

- Yes  
 No

If yes, what is this System of Records Notice (SORN): FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs."

Please provide the citation that was published in the *Federal Register* for the SORN: 71 FR 17234, 17252 (April 5, 2006).

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 yes, 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 legal authority that authorizes the development of the information system and the information/data collection?

1.23 In what instances would the information system’s administrator/manager/developer permit disclosure to those groups outside the FCC for whom the information was not initially intended.

Such disclosures, which are referred to as “Routine Uses,” are those instances that permit the FCC to disclose information from a SORN to specific “third parties.” These disclosures may be for the following reasons:

(check all that are applicable)

- Adjudication and litigation:

- Committee communications:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations (NTEU):
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA, *etc.*:
- Breach of Federal data:
- Others “third party” disclosures:

1.24 Will the information be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

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

1.26 How is information in this system retrieved?

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

1.28 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?

1.29 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:**

1.30 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:

FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs," SORN does not have a security classification.

2.2 Have there been any changes to the location of the information covered by the system of records notice (SORN)?

- Yes
- No

Please explain your response:

This SORN is maintained by the Administrative Services Center (ASC), Associate Managing Director--Administrative Operations (AMD-AO), in the Office of the Managing Director (OMD), at FCC headquarters, 445 12<sup>th</sup> Street, S.W., Room TW-C201, Washington, DC 20554.

(1) The information related to those FCC employees, paid interns, and co-op students who participate in the WMATA's Smartrip portion of the transit benefits subsidy program is also stored in the databases maintained by the Washington Metropolitan Area Transit Authority, headquartered at 600 Fifth Street, NW, Washington, DC 20001.

(2) The information related to the FCC employees, paid-interns, co-op students, contractors, and carpool/vanpool riders, who have been issued a parking permit is stored in an information system maintained by ASC, OMD-AMD, and in an information system operated by Republic Properties, which owns the Portals II parking garage, and Siemens, its contractor.

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 covered by this SORN include full-time and part-time FCC employees, paid interns, and co-op students, who participate in the FCC Transit Benefit and Parking Permit Programs, *i.e.*, applicants and recipients of transit fare benefit subsidies issued by the FCC, holders of parking permits, including full time and part time FCC employees, paid interns, co-op students, executive status employees, handicap status employees, contractors, and non-FCC employees and contractors who are members of carpools and vanpools.

2.4 Have there been any changes to the categories of records, *e.g.*, types of information (or records) that the system of records notice (SORN) collects, maintains, and uses?

- Yes  
 No

Please explain your response:

The categories of records in this SORN include the personally identifiable information (PII) required to administer the Transit Benefits and Parking Permit Programs. This PII serves to determine each applicant's qualifications based on handicap status, to determine his/her mode of transportation to and from work ("commute to work"), and to certify that his/her monthly commuting cost to and from work is accurate. These records include the information obtained from FCC Forms A-30, A-75, and A-75A, as follows:

- (1) Employee transit benefit subsidy program applications, transit benefit certification, "change request" information on employee transit benefit program application recipients, parking application, vanpool and carpool verification, employee handicap verification, and executive staff title.
- (2) Information regarding the organizational location, employee's office telephone number, FCC employee, paid intern, co-op student, or contractor badge number (employee ID), home address, vehicle make/model, license plate number, handicap status documents, vanpool /carpool information, executive status title, mode of transportation and monthly cost of bus and/or metro transportation for FCC employees, paid interns, or co-op students, who have submitted applications for the Transit Benefits and/or Parking Permit Programs.
- (3) Records and reports of disbursements to transit benefit recipients, parking permit recipients, handicap status, and information on local public mass transit facilities.
- (4) Information regarding individuals who are not affiliated with the FCC who are carpool or vanpool riders.

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 statutory authority to provide public transportation, parking records, and handicap parking services is derived from 5 U.S.C. 7901 and 7905, 5 U.S.C. 301, and Executive Order 13105.

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 FCC's purposes for collecting, maintaining, and using the PII contained in this SORN are used as follows:

(1) To support the FCC's program that provides transportation subsidies and issues parking permits to FCC employees, paid interns, and co-op students and/or contractors (as applicable); and

(2) To ensure for auditing purposes the accuracy and integrity of this FCC program, to qualify and to certify beneficiaries of the program, and to prepare listing and reports for use by the FCC and the other Federal, state, and local agencies charged with oversight of or contribution to the transit subsidy benefit and/or parking permit programs.

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

- Yes
- No

If the Routine Uses have changed, what changes were made:  
(check all that apply and explain the changes)

- Not applicable—there have been no changes to the Routine Uses
- Adjudication and litigation:
- Breach of Federal data: Required by OMB Memorandum M-07-16 (May 23, 2007).
- Committee communications:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
  
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA:
- 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:

Information covered by the FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs," SORN is not disclosed to consumer reporting agencies.

- 2.9 Have there been any changes to the policies and/or guidelines for the storage and maintenance of the information covered by this system of records notice (SORN)?

Yes  
 No

Please explain your response:

Records are maintained in file folders and in the FCC's transit benefit and parking permit computer databases, in the Washington Metropolitan Area Transit Authority (WMATA) database(s) associated with the Smartrip program, and/or in Republic Properties and Siemens database(s), as applicable.

- 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:

Records are retrieved by the employee's name or by the FCC badge identification number, vehicle license tag number, and/or parking permit 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:

Records are maintained in a secured area and are available only to authorized personnel, *e.g.*, FCC and contract personnel, whose duties required access. Computer databases are set up with a secured password. File cabinets where the records are stored are controlled by on-site personnel when unlocked and locked when not in use. All transit subsidy benefits and parking permits are kept in a locked cash box contained in a (cylinder lock) drawer. At close of business, the cash box is secured in a government issued safe with a combination lock.

Please note that you must also provide an update of the current protections, safeguard, and other security measures that are in place in this SORN in **Section 5.0 Safety and Security Requirements:**

- 2.12 Have there been any changes to the records retention and disposition schedule for the information covered by the system of records notice (SORN)? If so, has the system manager worked with the Performance Evaluation and Records Management (PERM) staff to insure that this revised schedule been approved by the National Archives and Records Administration (NARA)?

Yes  
 No

Please explain your response:

The FCC maintains the records in this SORN for three years in accordance with the General Records Schedule 6 established by the National Archives and Records Administration at <http://www.archives.gov/records-mgmt/ardor/grs06.html>. Records are then shredded. Electronic records are destroyed physically (electronic storage media) or by electronic erasure.

**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: The FCC participates with WMATA in the transit benefits subsidy program. The FCC uses the information that program applicants, including FCC employees, paid interns, and co-op students, provide on FCC Forms A-75 and FCC Form A-75-A and via the WMATA Smartrip trip calculator to determine the applicant's qualification to participate and the amount of the applicant's transit benefit subsidy. This information and the applicant's identifiable information (PII), *i.e.*, name, address, handicap status, etc., are covered by FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs," SORN.

The FCC participates with Republic Properties and their contractor, Siemens, in the Portals II parking permit program. The FCC collects the PII from FCC employees, paid interns, co-op students, contractors, and non-FCC employees who are carpool/vanpool riders on FCC Form A-30. This information is shared with Republic Properties and Siemens, who have responsibility for the Portals II garage parking permit program.

3.2 Where will the information system be hosted?

- FCC Headquarters: The FCC hosts the information that FCC employees, paid interns, co-op students, contractors, and non-FCC carpool/vanpool riders provide on FCC Forms A-75, A-75-A, and A-30.
- Gettysburg
- San Diego
- Colorado
- New York
- Columbia Lab
- Chicago
- Other information: WMATA hosts the information system that manages the Smartrip rider program, including the personally identifiable information (PII) on individuals who purchase Smartrip cards and their ridership data each time they use the Smartrip card. Republic Properties and its contractor Siemens, host the information system that manages the Portals II garage parking permit data, including the PII on each individual who is issued a parking permit or is part of a carpool/vanpool, *etc.*

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: FCC employees in the Administrative Services Center (ASC) division of the Office of the Managing Director-Administrative Operations (OMD-AO).
- FCC staff in other bureaus/offices:
- Information system administrator/Information system developers: FCC employees in the Information Technology division of the Office of the Managing Director (OMD-IT).
- Contractors: Contractors working in the ASC division of OMD-AO.
- Other information system developers, *etc*: WMATA, which manages the Smartrip program, and Republic Properties and Siemens, which manage the Portals II garage parking program.

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)?

The information system administrators and managers in ASC division of AMD-AO make a determination about which FCC employees and contractors are granted access on a "need to know" basis as determined by the employee or contractor's 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 the ASC division of OMD-AO may be granted access on a "need-to-know" basis as part of 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: FCC employees and contractors in the FCC's Information Technology division of the Office of the Managing Director (OMD-IT).
- Information system administrators: Staff in the ASC division of OMD-AO, including both FCC employees and contractors, who manage the administrative operations and IT systems that hold and process the PII data and that are covered by this SORN.
- Information system developers: FCC employees and contractors in the IT division of the Office of the Managing Director, (OMD-IT).
- FCC staff in this bureau/office: FCC employees in the ASC division of OMD-AO are granted access based on a "need to know" basis.
- FCC staff in other bureaus/offices:
- FCC staff in other bureaus/offices in FCC field offices:
- Contractors: Access is limited to the FCC's contractors in the ASC division of OMD-AO and those in the IT division of OMD-IT, who 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 FCC's Information Technology (IT) supervisory staff in the Office of the Managing Director (OMD-IT) provide periodic privacy training to the IT contractors and during the security profile re-certification process.

- 3.8 Has the Office of the General Counsel (OGC) signed off on any Section M contract(s) for any contractors who work with the information system covered by this system of records notice (SORN)?

Yes  
 No

Please explain your response:

The Office of the General Counsel review and approves all Section M contracts for the contractors in the ASC division of OMD-AO and in OMD-IT who manage the PII in the information systems covered by FCC/OMD-7, "FCC Employee Transit Benefits and Parking Permit Programs," SORN.

- 3.9 Does the information system covered by this system of records noticed (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:

The use of PII that is covered by FCC/OMD-7, "FCC Employee Transit Benefits and Parking Permit Programs," SORN is not shared or transmitted between the FCC and WMATA or between the FCC and Republic Properties and Siemens. However, information sharing arrangements do exist, as follows:

(1) WMATA maintains PII on individuals who purchase Smartrip cards. WMATA also maintains an information system to compute the amount of transit benefits subsidy to which participants in the transit benefits subsidy program are entitled. This subsidy amount must be provided to the FCC by those who participate voluntarily in this transit benefits subsidy program.

(2) Republic Properties and its contractor, Siemens, maintain information systems containing the PII of FCC employees, contractors, and carpool/vanpool riders who participate voluntarily in the parking permit program by submitting FCC Form A-30. The PII is used to manage the use of the parking garage facilities and parking space criteria, *i.e.*, handicap, executive status, carpool/vanpool parking areas.

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 PII information, which is collected from FCC employees, paid interns, co-op students, contractors, and non-FCC employees who are carpool/vanpool riders, is covered under FCC/OMD-7, “FCC Employee Transit Benefit and Parking Permit Program,” SORN.

Part of the duties of the ASC division staff in the OMD-AO who administer the transit benefit and parking programs is to ensure that the PII data on the FCC employees, contractors, paid interns, co-op students, and non-FCC carpool/vanpool riders, who participate voluntarily in either of these two programs (as applicable) are reliable, accurate, complete, and current.

Inaccurate and/or out-of-date information would be detrimental to the purposes for collecting, maintaining, and using the information in emergencies. It may also be illegal if an individual intentionally provided false, fictitious, or fraudulent certification to obtain a transit benefit subsidy or parking permit to which he/she were not entitled. In such cases, *i.e.*, obtaining the subsidy or handicapped parking permit, may be subject the individuals to criminal prosecution, as under 18 U.S.C. 1001 for violating the transit subsidy provisions.

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: FCC employees, paid interns, and co-op students must obtain a commuting trip calculation from WMATA and provide this information to the FCC as the basis for determining their transit benefit subsidy. Individuals who claim handicap status to park in the Portals II garage parking must provide a medical statement to verify their handicap status. Non-FCC employees who participate in a

carpool/vanpool must provide their name, address, agency name, phone number, and signature.

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:

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?

In addition to an annual data inspection program, the ASC staff in OMD-AO makes period, random checks during the year to insure that the PII on those who are participating in the transit benefits program and the parking permit program to insure that this information is accurate and up-to-date.

### 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 diskettes, 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:

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:

FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs," SORN is not linked to any other FCC information systems that collect PII for these or other purposes, *e.g.*, it is a "stand alone" information system.

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:

While the information that is covered by FCC/OMD-7, "FCC Employee Transit Benefit and Parking Program," SORN is not necessary to the timely performance of FCC operations, as it does not impact the FCC's regulatory mission or functions, this information does assist FCC employees with their commute to work. The PII in this SORN does serve several important ancillary purposes:

(1) The information provides the means to allocate parking spaces for FCC employees, in particular, handicapped employees who must use a motor vehicle to commute to work. Otherwise, it would be difficult, if not impossible for many FCC employees to get to work. The FCC may also be in violation of the ADA for failing to provide adequate accommodations for handicapped employees.

(2) The information provides the means by which the FCC can participate in the Washington Metropolitan Region's program to reduce pollution via increased use of mass transit and carpool/vanpool ridership for the work commute as part of the Federal "ISTEA" project.

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) 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:

If there are no externally facing information system portal at [www.fcc.gov](http://www.fcc.gov), please skip to Question 5.11.

5.9 If the information is collected via [www.fcc.gov](http://www.fcc.gov) from the individuals, how does the information system notify users about the Privacy Notice:

- Link to the FCC's privacy policies for all users:  
 Privacy notice displayed on the webpage:  
 Privacy notice printed at 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 any other way.

Please explain your response:

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

- Yes  
 No

Please explain your response:

If the information is not collected via 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 any other way.

Please explain your response:

If information is not collected via a customer-facing portal on the FCC Internet at [www.fcc.gov](http://www.fcc.gov) or the FCC Intranet for FCC employees and contractors, 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.* FCC employees may access FCC Form A-30, "FCC Parking Application," FCC Form A-75, "FCC Headquarters Employee Transit Benefit Application," and FCC Form A-75A, "FCC Employee Transit Benefit Change Request Form," via the Word software program. These applications can be downloaded and completed, then submitted to ASC for review and processing.  
 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), 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 PII that the Commission collects from FCC employees, paid interns, co-op students, contractors, and/or non-FCC employees who are carpool/vanpool riders, who participate voluntarily in the transit subsidy benefit or the parking permit programs, as applicable, is only used to determine their eligibility to participate in either of these programs and the appropriate transit subsidy or parking permit payment according to their commuting cost or their handicap certification, executive status, vanpool and carpool participation, or regular employee parking status.

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

- Yes
- No

Please explain your response:

Participation in the FCC Employee Transit Benefit and Parking Permit Programs is voluntary. FCC employees, paid interns, co-op students, and contractors may choose not to participate or may be ineligible if they fail to meet the specific criteria for participation in either of these programs. Individuals who chose to participate may not decline to provide their personally identifiable information (PII) since the FCC must collect this information from them as part of the administration of these two programs.

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

- Yes  
 No

Please explain your response:

Since participation in the FCC Employee Transit Benefit and Parking Permit Programs is voluntary. By participating the FCC employees is consenting to the use of his/her PII, *e.g.*, individuals do not have the right to consent to particular uses of their personally identifiable information (PII) since the collection of this PII is required for the FCC to administer the two programs.

(1) Employees who participate in the transit benefit program receive a transit subsidy, and employees who are certified as "handicapped" receive a parking permit benefit.

(2) FCC and non-FCC employees who utilize a parking space (as a single driver or as a participant in a carpool/vanpool) in the Portals II parking garage at the FCC or a parking facility in any other Federal agency parking garage may not participate in the transit benefit subsidy program.

In these instances, it is illegal to make a false, fictitious, or fraudulent certification to obtain one of these two benefits; thus the FCC needs this PII to determine the employee's eligibility for the subsidy and the appropriate amount of the subsidy.

If individuals do not have the right to consent to the use of their information, please skip to Question 5.23.

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 What kinds of report(s) can the information system and/or the information be used to produce on the individuals whose PII data are in the information system covered by the system of records notice (SORN)?

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 personally identifiable information (PII) that is covered by FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs," SORN are required to complete privacy training. In addition, the ASC division staff in OMD-AO emphasizes to those FCC employees and contractors with access to the PII in the transit benefit and parking program 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:

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: The FCC has inaugurated a Commission-wide Privacy Training program, and all employees and contractors were required to complete the privacy training course in September 2006. FCC employees and contractors who are hired after September 2006 must complete their privacy training within six months after they are hired. Furthermore, the ASC division staff in OMD-AO has instituted a review of its security controls over PII as part of its privacy review and training program.

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 ASC staff conducts a training session every six months to update the staff that handles the PII covered by this SORN of their duties and responsibilities in using this information, or more often as the situation requires.

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:

If the Privacy Threshold Assessment 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 FCC maintains only minimal personally identifiable information (PII) on FCC employees who participate in the transit subsidy benefits and parking permit programs, *i.e.*, no Social

Security Numbers are used. FCC employees, paid interns, and co-op students may choose to have their transit benefit subsidy deposited directly into their personal bank accounts, if they use a WMATA Smartrip Card.

WMATA's information systems monitor the Smartrip Card program, including each Smartrip Card user's trip data, including the trip's origin and destination, time of use, trip cost, *etc.* The Smartrip Card data are not shared with the FCC.

The FCC shares some of the information that participants in the Portals II parking garage parking permit program provide to Republic Properties and their contractor, Siemens, which owns and manages the Portals II garage parking facilities. The shared information includes the individual's name and vehicle information, *i.e.*, vehicle tag number, vehicle description, *etc.*, and the carpool/vanpool riders. Republic Properties and Siemens manage the uses of the Portals II garage by parking permit holders.

- 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 FIPS 199 Assessment, which was conducted on 01/22/2007, has assigned a "moderate" impact level to this information system, its applications, *i.e.*, transit benefit subsidy and garage parking systems, and the personally identifiable information it transmits, stores, processes, or authenticates.

- 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 information system covered by FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Program," SORN is considered a "minor" FCC application. This information system will get a C&A once the Commission implements the minor application C&A schedule.

- 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.*: Since this information system is a "minor" system, the CIO has not yet assigned it either an independent risk assessment nor an independent security test and evaluation.  
 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 PII that is covered by FCC/OMD-7, "FCC Employee Transit Benefit and Parking Program," SORN does not use any new technologies to monitor the individuals who participate in either of these two programs. However,

(1) WMATA will deposit an employee's monthly transit benefit subsidy directly into the employee's personal bank account if an FCC employee uses a Smartrip Card. WMATA can also monitor an individual's use of the Metro and bus system, *i.e.*, day, time, origin, and destination for each trip, if the individual uses the Smartrip Card to pay for their metro commute. This information is not shared with the FCC.

(2) FCC employees who park in the Portals II garage must use their FCC employee ID badge to enter and exit the garage. Republic Properties and its contractor, Siemens, can monitor which individuals and when they are using the parking garage, including day and time the individuals enter and exit the garage. This information is not shared with the FCC.

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

WMATA can monitor FCC employees who use their Smartrip cards to pay for their metro commute. The details of each Metro and bus trip are stored in WMATA's information system. Republic Properties and Siemens can monitor who is using the Portals II parking garage and when, including the day and time of use.

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:

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 yes, what PRA information collections covered by this system of records notice (SORN) are associated with this database please list the OMB Control Number, Title of the collection, Form number(s) as applicable, and Expiration date:

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

FCC Form Number(s) and Title(s):

- 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, including FCC employees, paid interns, and co-op students, contractors, working at the FCC, and non-FCC carpool/vanpool riders, who have applied to receive the applicable transit benefit subsidy or who have applied for a parking permit by filing out the requisite FCC Forms A-75, A-75-A, and/or A-30 may address their inquiries to the Administrative Services Center (ASC) or the Associate Managing Director, Administrative Operations (AMD-AO) in OMD for FCC/OMD-7, “FCC Employee Transit Benefit and Parking Permit Programs,” SORN. 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:

Participation in the transit benefits and/or parking program that is voluntary. Nonetheless, individuals, including FCC employees, paid interns, co-op students, and contractors working at the FCC, and non-FCC carpool/vanpool riders seeking access to the information about themselves that is contained in the information system covered by FCC/OMD-7, “FCC Employee Transit Benefit and Parking Permit Programs,” SORN should contact the Administrative Services Center (ASC) or the Associate Managing Director of the Administrative Operations (AMD-AO) in OMD in OMD. 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, including FCC employees, paid interns, co-op students, and contractors working at the FCC, and non-FCC employees who are carpool/vanpool riders, who are seeking to correct or to amend information about themselves in the information system that is covered by FCC/OMD-7, “FCC Employee Transit Benefit and Parking Permit Programs,” SORN, should contact the Administrative Services Center (ASC) or the Associate Managing Director, Administrative Operations (AMD-AO) in OMD. This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, 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, including FCC employees, paid interns, co-op students, and contractors working at the FCC, and non-FCC employees who are carpool/vanpool riders, who are seeking any redress to amend or correct information about themselves in the information system covered by FCC/OMD-7, “FCC Employee Transit Benefit and Parking Permit Programs,” SORN should contact the Administrative Services Center (ASC) or the Associate Managing Director of the Administrative Operations (AMD-AO) in OMD in OMD. This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, 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 information system covered by FCC/OMD-7, “FCC Employee Transit Benefit and Parking Permit Programs,” SORN remain unchanged. These records sources include FCC employees, paid interns, co-op students, and contractors working at the FCC, who are eligible to receive the transit benefit subsidy and/or holders of parking permits and handicap status parking permits and non-FCC employees who are members of carpools and vanpools.

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-7, "FCC Employee Transit Benefit and Parking Permit Programs," 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 staff of the Administrative Services Center (ASC) in OMD-AO has posted notices that the information in the information system's electronic records and databases and paper files that are covered by FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs," SORN are "non public for internal use only." The ASC also issues reminders periodically to those granted access to the information that they are to keep the information confidential and to safeguard any printed materials.

7.8 How often is the information system audited to ensure compliance with FCC and OMB regulations and to determine new needs?

- Six months or less
- One year
- Two years
- Three years
- Four years
- Five years
- Other audit scheduling procedure(s): Although this information system does not have an audit requirement, the Administrative Operations division of OMD (OMD-AO) does have procedures, identified elsewhere in this PIA, that note the administrative protections, privacy training, access controls, and security levels that are in place to safeguard the personally identifiable information (PII) that is contained in this information system covered by FCC/OMD-7, "FCC Employee Transit Benefit and Parking Permit Programs," SORN.

### 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:

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:**

- a. Some of the information system's personally identifiable information (PII) includes paper documents that are stored in file cabinets.
- b. Some of the information system's personally identifiable information (PII) includes electronic records that are stored in the FCC's computer network databases.
- c. This information system shares personally identifiable information (PII), including electronic records and paper files with Republic Properties and its contractor Siemens. There is the potential for employees of Republic Properties and Siemens to gain unauthorized access to this information.

**Mitigating factors:**

- a. PII that is contained in paper documents is stored in locked file cabinets, which are located in rooms that are locked when not in use.
- b. PII that is contained in electronic records is protected in the FCC's computer network databases, which require users to provide login's and access rights to these records.
- c. PII that is transferred between the FCC and Republic Properties and Siemens is limited to the parking permit holder's name, ID badge number, and vehicle license plate number. Also the staff of Republic Properties and Siemens are trained to know their responsibilities to protect this PII from inadvertent disclosure.

9.2 What deficiencies did the bureau/office find in its procedures for evaluating the information system(s) covered by this system of records notice (SORN) and what remedies did the bureau/office enact following this Privacy Impact Assessment (PIA)?

<b>Deficiencies:</b>	<b>Remedies:</b>
a. (no deficiencies)	a.
b.	b.
c.	c.

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

Initial implementation:

Secondary implementation: March 2008

Tertiary implementation:

Other implementation:

9.4 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: