

Federal Communications Commission
Office of the Managing Director



**Privacy Impact Assessment¹ (PIA) for the
Wireless Services Licensing Records (ULS)**

November 5, 2008

FCC Bureau/Office: Wireless Telecommunications Bureau (WTB)
Division: Spectrum Management Resources and Technology Division (SMaRT)

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

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

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

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

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

Section 1.0 Information System's Contents:

1.1 Status of the Information System:

- New information system—Implementation date:
- Revised or upgraded information system—Revision or upgrade date: October 2008

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

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

Please explain your response:

The Wireless Telecommunications Bureau (WTB) is revising the ULS information systems, including the personally identifiable information covered by the system of records notice (SORN) WTB-1, "Wireless Services Licensing Records (ULS)" SORN. The WTB is consolidating WTB-5, "Application Review List for Present or Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly" SORN, and WTB-6, "Archival Radio Operator Records" SORN, which are now part of WTB-1 system of records notice.

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 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 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:

The information systems that are covered by this system of records notice, FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN have existed under this SORN since the SORN's creation in December 1998, *see* 63 FR 71138 (December 23, 1998). Two SORNs, WTB-5, "Application Review List for Present and Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly," and FCC/WTB-6, "Archival Radio Operator Records," are being merged into FCC/WTB-1.

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 1.7.

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:

There have been changes to the media in which the ULS information system stores its data. The ULS information system now includes:

- (1) The ULS electronic information systems covered by FCC/WTB-1;
- (2) The paper records and documents that are in FCC/WTB-5, "Application Review List for Present and Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly" SORN and in FCC/WTB-6, "Archival Radio Operator Records" SORN, which are being merged into FCC/WTB-1; and
- (3) The microfiche documents in FCC/WTB-5, "Application Review List for Present and Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly," and FCC/WTB-6, "Archival Radio Operator Records," are being merged into FCC/WTB-1.

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 ULS information system, including the personally identifiable information covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, is linked to the FCC's Commission Registration System (CORES).

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:

The FCC's Commission Registration System (CORES) and the Revenue Management Information System (RMIS), which are operated by the Financial Operations Division of the Office of the Management Director (OMD-FO), interface with the ULS information system so that information is exchanged with the Commission wireless licensing functions, *etc.*, as necessary for the Commission to carry out its wireless telecommunications activities, including licensing, regulation, and enforcement functions, *etc.*

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

Information about FCC Employees:

- No FCC employee information
- FCC employee's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)

- Emergency contact data:
- Credit card number(s)
- Driver's license
- Bank account(s)
- FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

Information about FCC Contractors:

- No FCC contractor information
- Contractor's name
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- SSN
- U.S. Citizenship
- Non-U.S. Citizenship
- Race/Ethnicity
- Gender
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Non-FCC personal employment records
- Military records
- Financial history

- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

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

- Not applicable
- Individual's name:
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN: Taxpayer Identification Number (TIN) may be substituted.
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship:
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age:
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- Personal e-mail address(es)
- Non-FCC personal employment records
- Military records
- Financial history
- Foreign countries visited
- Law enforcement data
- Background investigation history
- National security data
- Communications protected by legal privileges
- Digital signature

- Other information: The ULS information system may also include correspondence relating to authorizations in the Wireless Services and information contained in FCC Forms 175, 601, 602, 603, 605, 606, 608, 609-T, 611-T, 620, 621, 811, 854, 979-A and 979-B, 1068-A, and the Request for Technical Support - Help Request Form, and the supporting exhibits submitted by applicant(s) and related documentation associated with the FCC's processing of these forms. An applicant seeking authorization for the construction of new antenna support structures, or authorization to collocate antennas on an existing communications tower or non-tower structure, must include the resume or curriculum vitae of principal investigators or other researchers who contributed to the filing. An applicant who is a non-US citizen and/or who represents a foreign government or business must acknowledge such status. An applicant must also acknowledge any prior FCC license revocation or felony convictions.

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: Taxpayer Identification Number may be substituted.
- 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 ULS information system may also include correspondence relating to authorizations in the Wireless Services and information contained in FCC Forms 175, 601, 602, 603, 605, 606, 608, 609-T, 611-T, 620, 621, 811, 854, 979-A and 979-B, 1068-A, and the Request for Technical Support - Help Request Form, and the supporting exhibits submitted by applicant(s) and related documentation associated with the FCC's processing of these forms. An applicant seeking authorization for the construction of new antenna support structures, or authorization to collocate antennas on an existing communications tower or non-tower structure, must include the resume or curriculum vitae of principal investigators or other researchers who contributed to the filing. An applicant who is a non-US citizen and/or who represents a foreign government or business must acknowledge such status. An applicant must also acknowledge any prior FCC license revocation or felony convictions.

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

- Personal information from FCC employees:
- Personal information from FCC contractors:
- Personal information from non-FCC individuals and/or households: WTB applicants may submit personally identifiable information as part of their application(s).
- Non-personal information from businesses and other for-profit entities: WTB applicants may submit personally identifiable information as part of their application(s) if they are self-employed, *i.e.*, consultants, *etc.*.
- Non-personal information from institutions and other non-profit entities: WTB applicants may submit personally identifiable information as part of their application(s).
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources: International agencies, *i.e.*, International Telecommunications Union (ITU) and/or foreign governments may provide information, *i.e.*, Canadian and Mexican government agencies coordinating cross border telecommunications coordination, *etc.*

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 ULS information systems, including the personally identifiable information covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, are linked to other FCC information systems, *i.e.*, CORES Registration System and the Revenue Management Information System (RMIS), and to non-FCC information systems, *i.e.*, U.S. Department of Treasury Financial Management Services, U.S. Department of Justice, U.S. Coast Guard, Federal Aviation Administration (FAA), and other federal agencies that match information pertaining to federal debt collection activities, civil or criminal matters, maritime and aeronautical operations, *etc.*

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): CORES and RMIS information systems.
- Non-FCC information system and information system name(s): U.S. Department of the Treasury's Internal Revenue System's information systems; U.S. Department of Justice, U.S. Coast Guard, FAA, *etc.*
- FCC employee's name: FCC employees and contractors who are amateur radio operators or have other wireless telecommunications licenses or certifications.
- (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: Individuals' Taxpayer Identification Number may be substituted.
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scan/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information:
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s)
- Personal e-mail address(es)
- Non-FCC personal employment records
- Non-FCC government badge number (employee ID)
- Law enforcement data
- Military records
- National security data
- Communications protected by legal privileges
- Financial history
- Foreign countries visited
- Background investigation history
- Digital signature
- Other information: The ULS information systems, including the personally identifiable information covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, are linked to other FCC information systems, *i.e.*, CORES Registration System and the Revenue of Accounting Management Information System (RMIS), and to non-FCC information systems, *i.e.*, U.S. Department of Treasury Financial Management Services, U.S. Department of Justice, U.S. Coast Guard, Federal Aviation Administration (FAA), and other federal agencies that match information pertaining to federal debt collection activities, civil or criminal matters, maritime and aeronautical operations, *etc.*

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: Taxpayer Identification Number may be use instead of the 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: The ULS information system obtains information from FCC and non-FCC information systems that pertains to authorizations in the Wireless Services and information contained in FCC Forms 175, 601, 602, 603, 605, 606, 608, 609-T, 611-T, 620, 621, 811, 854, 979-A and 979-B, 1068-A, and the Request for Technical Support - Help Request Form, and the supporting exhibits submitted by applicant(s) and related documentation associated with the FCC's processing of these forms. An applicant seeking authorization for the construction of new antenna support structures, or authorization to collocate antennas on an existing communications tower or non-tower structure, must include the resume or curriculum vitae of principal investigators or other researchers who contributed to the filing. An applicant who is a non-US citizen and/or who represents a foreign government or business must acknowledge such status. An applicant must also acknowledge any prior FCC license revocation or felony convictions.

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:

Information in the Universal Licensing System's (ULS) information system and the personally identifiable information (PII) it contains, which is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, may be linked to other FCC and/or non-FCC information systems, *i.e.*, FCC's CORES Registration System, Department of Treasury Financial Management

Services, U.S. Department of Justice, and/or other federal agencies that collect debts, monitor civil and criminal regulations, *etc.*

- 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 ULS information system's personally identifiable information (PII) that is collected, stored, used, and maintained by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, can be retrieved by one or more "unique identifiers," which may include an individual's SSN, TIN, or other PII. PII in the ULS information system may be linked to other FCC information systems, *i.e.*, CORES Registration System, *etc.*, and the PII may be retrieved by these same "unique identifiers such as name, home address, home telephone number, *etc.*

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

Yes
 No

Please explain your response:

The personally identifiable information (PII) that is collected, stored, used, and maintained by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, may in some instances, be stored in the ULS databases and paper record files, and the FCC may use the information to determine an individual's suitability to obtain a license, *etc.* Furthermore, the FCC may share this information with other federal agencies as required by FCC and Congressional statutes and requirements, *i.e.*, IRS debt payments, drug debarment, *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): This system of records notice, FCC/WTB-1, "Wireless Services Licensing Records (ULS)," was published in the *Federal Register* on April 5, 2006.

The two other SORNs, FCC/WTB-5, "Application Review List for Present or Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly," and FCC/WTB-6, "Archival Radio Operator Record," are being merged into FCC/WTB-1. These two merged SORNs were published in the same issue of the *Federal Register*.

Please provide the citation that was published in the *Federal Register* for the SORN: 71 FR 17234, 17269 - 17273.

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 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 Information Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations (NTEU):
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA, *etc.*:
- Breach of Federal data:
- Others "third party" disclosures:

1.24 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:

The FCC's Security Operations Center has not assigned a security classification to the ULS's information systems and to the personally identifiable information that it collects, uses, and maintains, which are covered by WTB-1, "Wireless Services Licensing Records (ULS)" 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 personally identifiable information (PII), which is covered by this SORN, is located in the Wireless Telecommunications Bureau (WTB), Federal Communications Commission (FCC), 445 12th Street, SW, Washington, DC 20554.

2.3 Have there been any changes to the categories of individuals covered by the system of records notice (SORN)?

- Yes
 No

Please explain your response:

The categories of individuals that are covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, and including the information previously covered by FCC/WTB-5 and FCC/WTB-6 SORNs, are as follows:

- (1) Licensees and applicants, including individuals or entities with attributable interests therein;
- (2) Tower owners, Indian Tribes and Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs).
- (3) Consultants, representatives, and contact persons relating to radio systems licensed or processed by the Wireless Telecommunications Bureau (WTB) under 47 C.F.R. Parts 13, 17, 22, 24, 27, 74, 80, 87, 90, 95, 97, and 101 of the Commission's rules (Wireless Services and Antenna Structures);
- (4) Individuals who are or have been licensed under 47 C.F.R. Parts 13, 22, 24, 27, 74, 80, 87, 90, 95, 97, and 101 of the Commission's rules and who have operated in violation of the FCC's rules or the Communications Act of 1934, as amended;
- (5) Unlicensed persons who have operated radio transmitting equipment;
- (6) Individuals who have had a license revoked or have had an application dismissed or denied, and are prohibited from filing another application within one year; and
- (7) Archival radio operator records of individuals who applied for and/or received a radiotelephone (wireless) operator license or permit prior to the implementation of the FCC's Universal Licensing System (ULS) in 2001.

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 personally identifiable information (PII), which are covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, and including the information previously covered by FCC/WTB-5 and FCC/WTB-6 SORNs, are as follows:

- (1) Applications, licenses, and pleading relating to such applications--including individual Social Security Numbers or SSNs and/or Taxpayer Identification Number(s) or TINs, race, ethnicity, and gender.
- (2) Correspondence and filings relating to wireless telecommunications authorizations;
- (3) Requests for authorizations in the Wireless Services and Tower Registrations;
- (4) Filings that relate to the Tower Construction Notification System;
- (5) Information, including PII, obtained from FCC Forms 175, 601, 602, 603, 605, 606, 608, 609-T, 611-T, 620, 621, 811, 854, 979-A and 979-B, 1068-A, Request for Technical Support - Help Request Form, and any supporting exhibits submitted by the applicant(s), and related documentation associated with the FCC's processing of these forms;
- (6) Name, address, data of birth (if known), authorization code of the WTB staff member who placed the applicant, licensee, operator, or unlicensed individual's name in the information system file(s), and information's file entry date for present or former licensees, operators, or unlicensed individuals operating radio equipment improperly; and
- (7) Archival radio operator records for applications and associated documentation for radiotelephone (wireless) operator's licenses or permits filed prior to the implementation of the FCC's Universal Licensing System in 2001.

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 authority for maintenance of the personally identifiable information (PII) covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN now includes the legal authority under which the FCC collected and maintained information covered by FCC/WTB-5 and FCC/WTB-6, and is as follows:

31 U.S.C. 7701; 47 U.S.C. 301, 303, 309, 312, 318, 362, 364, 386, 507, and 510; U.S.C. 6109, 47 C.F.R. Section 1.2112l;

The use of Taxpayer Identification Numbers (TINs) is authorized under the Debt Collection Improvement Act of 1996, 31 U.S.C. 7701.

Licensing disclosure requirements, *etc.*, are found under 47 C.F.R. Section 1.2112, and the Biennial Regulatory Review -- Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95, 97, and 101 of the Commission's Rules to Facilitate the Development and Use of the Universal Licensing System in the Wireless Telecommunications Services, *Report and Order*, WT Docket No. 98-20, FCC 98-234, 13 FCC Rcd 21027, 132-42.

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, and other records, which are covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)"

SORN, and including the information previously covered by FCC/WTB-5 and FCC/WTB-6 SORNs: include the following:

- (1) To administer the FCC's regulatory responsibilities, which includes licensing, enforcement, rulemaking, and other actions necessary to perform spectrum management duties;
- (2) To provide public access to pending requests for authorizations and information regarding current licensees and antenna structure registrations;
- (3) To determine the availability of spectrum for licensing based on the license records;
- (4) To determine when compliance filings, renewal applications, and fees are due from licensees;
- (5) To resolve disputes between radio operators regarding who has certain rights to use particular frequency bands in particular geographic areas;
- (6) To resolve cross border disputes with entities operating in Canada and Mexico;
- (7) To allow licensees to transfer, assign, or lease their interests in particular licenses or portions of licenses as the FCC's rules permit (after Commission approval);
- (8) To evaluate the completeness and sufficiency of requests for new or modified authorizations;
- (9) To permit public access to license data (except individual taxpayer identification numbers (TINs) and thereby promote the economical and efficient allocation of spectrum and the resolution of radio interference problems;
- (10) To permit selected FCC staff at FCC headquarters and in FCC field offices to determine whether to grant, dismiss, or set for hearing the application(s) of present or former licensees, operators, or unlicensed individuals who are or were operating radio equipment improperly; and
- (11) To retain for archival purposes the FCC's radio operator program's records concerning:
 - (a) Applications and determinations of license applicant qualifications;
 - (b) Limited file materials on licensed radio operators, which are to be available for public inspection; and
 - (c) Information on possible violations of the law being referred to the FCC's Enforcement Bureau, Office of the General Counsel, and to any other appropriate agency charged with the responsibility for investigation or prosecuting such violation(s).
- (12) To provide reports to a variety of federal officials on the current uses and utilization of the spectrum the FCC is charged with regulating; and
- (13) To monitor antenna structure registration and compliance with applicable oversight regulation.

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)

- 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: Debt Collection Act of 1982, Debt Collection Improvement Act of 1996, and Drug Debarment Act.
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA:
- Breach of Federal data:
- Others Routine Use disclosures not listed above: Public access at:
<http://wireless.fcc.gov/uls/index.htm?job=home>

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:

The FCC may disclose certain information as specified under 5 U.S.C. 552a(b)(12) and under the procedures contained in subsection 31 U.S.C. 3711(e), including the personally identifiable information (PII), which is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, to a consumer reporting agency, as defined by 31 U.S.C. 3701(a)(3), regarding a claim by the FCC that is determined to be valid and overdue as follows:

- (1) The name, address, Social Security Number (SSN) or Taxpayer Identification Number (TIN), and other information as necessary to establish the identify of an individual or organization responsible for a claim;
- (2) The amount, status, and history of a claim; and
- (3) The program under which the claim arose.

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:

All information, including the personally identifiable information (PII) that is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN is stored and accessed electronically. Information that is submitted to the FCC as paper documents is scanned or keyed into the ULS electronic information system, as appropriate. These paper documents are then archived. Access to the ULS electronic information system is password protected. Periodically,

the FCC makes back up tapes of the information in the ULS electronic information system, which are stored in both on-site and off-site locations.

Archival microfilm documents and archived paper documents are stored in file cabinets in offices that are secured 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 in the ULS information system's electronic databases is retrieved by searching electronically using a variety of parameters, including an individual applicant's name, licensee's unique identifier, call sign, file number, *etc.* Information contained in the archived paper documents and on microfilm must be searched individually.

- 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:

Certain information contained in the ULS information system is available on the Internet via the FCC's website: www.fcc.gov and by using the FCC web browser. However, the FCC has in place certain security features that limit the ability of individuals to enter and change their information as follows:

- (1) Each applicant or licensee is assigned a unique identifier (FCC Registration Number or FRN) after the individual registers with the FCC and provides his/her SSN or TIN. The individual is also issued a password.
- (2) The individuals can then conduct business with the Commission using their FRNs, including changing their own personal information as governed by the requirements and restrictions of the ULS information system.
- (3) Access to an individual's personally identifiable information is restricted to the SMaRT staff in WTB and to other FCC employees or contractors whose job duties and responsibilities require such access. The PII in the ULS information system is further protected by passwords.

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 Wireless Telecommunications Bureau maintains and disposes of the information, including the PII that is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN in accordance with the records schedules of the National Archives and Records Administration (NARA). Records are maintained for 12 years and 3 months after an individual or legal entity ceases to be a licensee. 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:

3.2 Where will the information system be hosted?

- FCC Headquarters
- Gettysburg
- San Diego
- Colorado
- New York
- Columbia Lab
- Chicago
- Other information:

3.3 Who will be the primary manager(s) of the information system who will be responsible for assuring access to, proper use of, and protecting the security and integrity of the information? (Check all that apply and provide a brief explanation)

- FCC staff in this bureau/office exclusively: The WTB and PSHSB staffs will have responsibility for access and proper use of the information in the ULS information system..
- FCC staff in other bureaus/offices:
- Information system administrator/Information system developers:
- Contractors:
- Other information system developers, *etc*:

3.4 What are the FCC's policies and procedures that the information system administrators and managers use to determine who gets access to the information in the system's files and/or database(s)?

Access to the data in the ULS information system is restricted to the staff in WTB's Spectrum Management Resources and Technology Division (SMaRT), Public Safety and Homeland Security Bureau (PSHSB), the Information Technology Center in the Office of Managing Director (OMD-ITC), and to other FCC employees and contractors working at the FCC on a "need to know" basis as part of 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 WTB 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 in WTB's Spectrum Management Resources and Technology Division (SMaRT) and in PSHSB grant access to the information and/or the ULS information system.
 - Information system administrators: Staff in WTB and PSHSB, including both FCC employees and contractors, who manage the financial and IT systems that hold and process the PII data.
 - Information system developers:
 - FCC staff in this bureau/office: FCC employees in WTB 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: FCC employees are granted access based on a "need to know" basis.
 - Contractors: Contractors working at the FCC are granted access based on a "need to know" basis.
 - Other Federal agencies: Federal Aviation Administration (FAA).
 - 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 Center (AMD-ITC) supervisory staff provide periodic privacy training to the IT contractors .

- 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:

3.9 Does the information system covered by this system of records notice (SORN) transmit/share personal information, *e.g.*, personally identifiable information (PII), between the FCC information technology (IT) network(s) and a public or other non-FCC IT network(s), which are not covered by this Privacy Impact Assessment?

- Yes
- No

Please explain your response:

The ULS information system, which includes the PII covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, transmits information system via the FCC's CORES and RMIS information systems..

If there is no information sharing or transmission, please skip to **Section 4.0 Data Quality, Utility, Objectivity, and Integrity Requirements:**

3.10 If the information system covered by this system of records noticed (SORN) transmits/shares personal information between the FCC network and a public or other non-FCC network, which is not covered by this Privacy Impact Assessment, what information is shared/transmitted/disclosed and for what purposes?

The information in the ULS information system, including personally identifiable information (PII) covered by WTB-1, "Wireless Licensing Services Records (ULS)" SORN, which is transmitted or shared is done via the FCC's CORES and RMIS information system. The information consists generally of data that Congress requires the FCC to provide to certain federal agencies and also to screen applicants, *i.e.*, drug debarment, civil or criminal liabilities, *etc.*

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.*?

Transmission of information, including any personally identifiable information (PII), in the ULS information system with other information systems within the FCC is safeguarded by firewalls, strong passwords, repeated login lock-out requirements, and other internal network security features.

The CORES password policies are: (a) passwords never expire; (b) logins are locked after five failed attempts; (c) the failed counter can be reset by answering a security question (What is the name of your dog, for example); and (d) other internal security measures.

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: U.S. Department of the Treasury, U.S. Department of Justice, and US Coast Guard, and Federal Aviation Administration (FAA), *etc.*
- State, local, or other government agencies:
- Businesses:
- Institutions:
- Individuals:
- Other groups: Search information for ship operators.

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?

The FCC shares information in the ULS information system, including PII, with certain federal agencies as required by Congress under the Debt Collection Act and other Congressional laws and regulations.

- 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?”

The Congress requires the FCC to transmit this information to certain federal agencies, *i.e.*, U.S. Department of Treasury, U.S. Department of Justice, FAA, U.S. Coast Guard, *etc.*, under terms outlined in the Congressional requirements..

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

The Congress requires the FCC to transmit this to certain federal agencies. The data transmission is secured through various security measures put in place by the FCC and the other federal agency to insure that there are no data breaches..

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: The ULS information system does not collection information from FCC employees and contractors working at the FCC.

Please explain any exceptions or clarifications:

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: Applicants who register with the Commission to obtain licenses and to conduct other business using the FCC's ULS information system.
 - 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:

WTB has in place various licensing and other requirements listed in the ULS on-line application that applicants must meet to qualify for a license, to construct or operate a transmission tower or antenna permits, and/or to participate in an auction, *etc.* Furthermore, the ULS information system's forms include a "certification statement" that willful false statements made on the forms or any attachments are punishable by fine and/or imprisonment under U.S. Code Title 18, Section 1001, and/or revocation of any station license or construction permit, under U.S. Code Title 47, Section 312(a)(1), and/or forfeiture, under U.S. Code 47, Section 503. The FCC believes, therefore, that all these requirements and regulations show the FCC's commitment to the Data Quality guidelines.

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

4.3 If the information that is covered by this system of records notice (SORN) is being aggregated or consolidated, what controls are in place to insure that the information is relevant, accurate, and complete?

The FCC requires all entities who register and use the ULS information systems, including individuals, businesses, institutions, etc., to certify that they have not made any false statements on any FCC forms and/or any attachments that the entity certify to the following:

The licensee certifies that all of its statements made in the application and in the exhibits, attachments, or documents incorporated by reference are material, are part of the application, and are true, complete, correct, and made in good faith.

A willful false statement made on any form or any attachment can be punishable by fine and/or imprisonment and/or revocation of any station license or construction permit, and/or forfeiture. Thus, since any intentional inaccuracies may result in one or more penalties, the Commission has the power to ensure that the information licensees provide 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?

As noted above, the FCC can be reasonably certain that information that licensees provide when they register and use the ULS information system meets the Data Quality guidelines because FCC forms require licensees to certify that they are providing true, complete, and correct information, and that intentionally providing false information carries fines and other penalties. The WTB and PSHSB staffs that administer the ULS information system, including FCC employees and contractors who work at the FCC, receive training, meet the requisite job performance standards, and adhere to Commission procedures and requirements that insure that the information, which is aggregated or consolidated in the ULS information system, is done in a manner that maintains its reliability, accuracy, and completeness as required by the Data Quality guidelines.

- 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?

Procedures are currently being developed to ensure that the information covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN adheres to applicable guidelines.

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: Microfiche contain archival information.

- 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 ULS information system collects, uses, and maintains is obtained from the data that applicants and licensees submit with their application materials.

5.3 Is the information system covered by this system of records notice (SORN) part of another FCC information system that collects personally identifiable information (PII)?

- Yes
- No

Please explain your response:

The ULS information system, which includes the PII covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" 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:

WTB's ULS information system is one of the FCC's major information systems. The unavailability of the ULS would seriously hinder the Commission's ability to process applications, to issue licenses, and to carry out Commission's responsibilities to manage the wireless telecommunications networks in the USA.

5.8 Will the information system include an externally facing information system or portal such as an Internet accessible web application at www.fcc.gov or other URL that allows customers/users to access development, production, or internal FCC networks, and which may pose potential risks to the information's security?

- Yes
- No

Please explain your response:

Applicants and licensees may access WTB's ULS information system to register and use the ULS's application and licensing features via www.fcc.gov. However, the ULS information system requires applicants and licensees who register as individuals, to provide very little personally identifiable information that is not public information, *e.g.* SSNs and TINs are not required. Furthermore, there is no externally facing information system or portal through which the public is granted access to development, production, or internal FCC networks.

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

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

- Link to the FCC's privacy policies for all users: <http://wireless.fcc.gov/fccprivacypolicy.html>.
- Privacy notice displayed on the webpage: www.fcc.gov/fccprivacypolicy.html.
- Privacy notice printed at the end of the form or document: All FCC forms that pertain to the ULS information system include a privacy notice.
- Website uses another method to alert users to the Privacy Act Notice, as follows:
- If there is no link or notice, why not:

5.10 If a privacy notice is displayed, which of the following are included?

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies whether providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

5.11 Will the information system include another customer-facing web site not on www.fcc.gov or other URL?

- Yes
- No

Please explain your response:

The ULS information system has only one customer-facing web site, which is the www.fcc.gov portal.

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

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

- Yes
 - Notice is displayed prominently on this FCC Intranet website:
 - Link is provided to a general FCC Privacy Notice for all users:
<http://wireless.fcc.gov/fccprivacypolicy.html>
 - Privacy Notice is printed at the end of the form or document:
 - Website uses another method to alert users to the Privacy Act Notice:
- No:

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

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

- Proximity and timing—the privacy notice is provided at the time and point of data collection.
- Purpose—describes the principal purpose(s) for which the information will be used.
- Authority—specifies the legal authority that allows the information to be collected.
- Conditions—specifies if providing the information is voluntary, and the effects, if any, of not providing it.
- Disclosures—specify the routine use(s) that may be made of the information.
- Not applicable, as information will not be collected in this way.

Please explain your response:

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

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

- Privacy notice is on the document, *e.g.*, FCC form, *etc.* All FCC forms pertaining to ULS have a privacy notice.
- Privacy notice displayed on the webpage where the document is located:
- Statement on the document notifies the recipient that they may read the FCC Privacy Notice at www.fcc.gov.
- Website or FCC document uses other method(s) to alert users to the Privacy Act Notice:
- Privacy notice is provided via a recorded message or given verbally by the FCC staff handling telephone calls:
- No link or notice, please explain why not:
- 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 or other URL, please skip to Question 5.17.

5.16 If consumers may access the information and/or the information system on-line via www.FCC.gov, does it identify ages or is it directed to people under 13 years old?

- Yes
- No

Please explain your response:

The FCC Website policy states that although the Commission's Website contains some pages that offer educational content to children. It is FCC policy, in compliance with the requirements of the Children's Online Privacy Protection Act (COPPA), not to collect information online about or from children age 13 and under, except when it is needed to identify a submission or to answer a question. Under no circumstances will any of this information be used for another purpose or shared with third parties, nor will personally identifying information be published on the FCC website.

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 ULS information system, which includes the PII that is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, may use the information that applicants and licensees provide or which is stored and retrieved from archival data to determine whether a new applicant or current licensee may continue to hold a license in those instances where, if information is available or becomes available it may cause the FCC to deny a new license or to revoke an existing license, *etc.*

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

- Yes
- No

Please explain your response:

Individuals who register to use the ULS information system may not decline to provide personally identifiable information (PII). The FCC has the right to collect this PII from them because such information is necessary for the FCC to use to determine their suitability for a new wireless license or the renewal of an existing wireless license. Providing this information is

authorized under the Communications Act of 1934, as amended. The FCC may use the PII to determine whether approving an individual's application is in the public interest. If an individual owes a delinquent debt to the federal government, the TIN and other information that the individual provides may be disclosed to the Department of the Treasury Financial Management Services or other federal agencies, *etc.*, to collect the debt.

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

- Yes
- No

Please explain your response:

Individuals do not have the right to consent to particular uses of their personally identifiable information (PII), because such information is necessary in order for the Commission to evaluate the ULS information system's applications effectively and to administer its licensing process successfully. The Commission's licensing process is authorized by the Communications Act of 1934, as amended.

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 information that is collected, used, stored and maintained in the ULS's information system are required to complete privacy training. In addition the WTB staff provides various notices and admonitions to the employees and contractors who have access that the PII that the information is not to be shared or disclosed without authorization.

5.25 How often are security controls reviewed?

- Six months or less: The SMaRT Division staff in WTB requires the security controls to be reviewed at least every six months for the ULS information system.
- 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: The SMaRT Division staff in WTB requires the that those personnel who use the information system to be trained once a year on their responsibilities for protecting the PII contained in the ULS information system.
- Two years
- Three years
- Four years
- Five years
- Other: The FCC has also inaugurated a Commission-wide privacy training program, and all employees and contractors were required to complete the privacy training course in September 2006.

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 SMaRT Division staff in WTB requires that those personnel who use the information system, including FCC employees and contractors working at the FCC, to be trained at least twice a year on their responsibilities for protecting the PII contained in the Universal Licensing Services (ULS) 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:

As one of the FCC's major information systems, the FCC's training and security requirements for the ULS information system conform to the FISMA requirements.

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:

Applicants and licensees may access WTB's ULS information system to register and use the ULS's application and licensing features via www.fcc.gov. However, the ULS information system requires individuals who are applicants and/or licensees to provide very little personally identifiable information that is not public information, *e.g.*, SSNs and TINs are not required. Furthermore, there is no externally facing information system or portal through which the public is granted access to development, production, or internal FCC networks.

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 impact level for the PII that is collected, used, and maintained in the ULS information and which is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN is consistent with 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 C&A is presently underway.

- 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.*: The FCC conducts an "in house" review.
 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 revisions to FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, which covers the PII that is collected, used, and maintained by the ULS information system do not include any new technologies or to existing technology that the Commission has not used previously. The revisions are solely due to the incorporation of two existing SORN, FCC/WTB-5, "Application Review List for Present or Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly," and FCC/WTB-6, "Archival Radio Operator Records," into this SORN.

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

Individuals are required to provide certain personally identifiable information (PII) when they register in the ULS information system to obtain a wireless license or to renew an existing wireless license. This PII is contained in the ULS information system's electronic database(s) and a unique identification number, the FCC Registration Number or FRN, is assigned to each individual or vendor, *e.g.*, business, contractor, institution, *etc.* The FCC believes that this technology has created a process that minimizes the disclosure of the most sensitive PII, *i.e.*, SSNs, TINs, *etc.*, and reduces the potential for inadvertent disclosure of such PII.

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 ULS information system is used exclusively to grant wireless licenses. The personally identifiable information (PII) that is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, is limited to the PII that individuals are required to provide to the FCC as part of ULS licensing process.

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:

Individuals (and other entities, *e.g.*, businesses, contractors, institutions, vendors, *etc.*) who apply for a wireless license or a wireless license renewal via the ULS information system must complete one or more FCC Forms as part of the Commission's application process. Following registration and after being issued a FRN, registrants may pay their regulatory and application fees and to conduct other financial transactions, *i.e.*, make other payments, as required for licenses, antenna registration, and other telecommunications services.

- 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:

The WTB has obtained OMB approval for all the FCC forms related to the ULS information system and its application and licensing processes as required by the PRA.

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):

3060-0132, 72-76 MHz Operational Fixed Stations, FCC Form 1068A.

3060-0139, Application for Antenna Structure Registration, FCC Form 854.

3060-0600, Application to Participate in an FCC Auction, FCC Form 175.

3060-0795, Associate WTB and/or PSHSB Call Signs and Antenna Structure Registration Numbers with Licensee's FRN, FCC Form 606.

3060-0798, FCC Application for Radio Service Authorization: WTB and PSHSB, FCC Form 601.

3060-0799, FCC Ownership Disclosure Information for the Wireless Telecommunications Services, FCC Form 602.

3060-0800, FCC Application for Assignment of Authorization or Transfer of Control: WTB and PSHSB, FCC Form 603

3060-0850, Quick-Form Application for Authorization in the Ship, Aircraft, Amateur, Restricted and Commercial Operator, and General Mobile Radio Services, FCC Form 605,

3060-0979, Notice of Cancellation, FCC Form 979A.

3060-0979, License Audit Letter, FCC Form 979B.

3060-1039, FCC New Tower ("NT") Submission Packet, FCC Form 620.

3060-1039, Collocation ("CO") Submission Packet, FCC Form 621.

3060-1042, Request for Technical Support - Help Request Form.

3060-1058, FCC Application or Notification for Spectrum Leasing Arrangement or Private Commons Arrangement: WTB and PSHSB, FCC Form 608.

3060-1092, FCC WTB Application to Report Designated Entity Eligibility Event, FCC Form 609-T 3060-1092, FCC WTB Annual Report Related to Eligibility for Designated Entity Benefits, FCC Form 611-T.

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: All FCC Forms listed above carry a privacy notice.
 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:

The WTB staff and OMD-PERM have coordinated all information collection requirements with the PRA.

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 ULS information system, which is covered by the FCC/WTB-1, “Wireless Services Licensing Records (ULS)” SORN, contains information about them may address their inquiries to the system manager or the Deputy Division Chief, Spectrum Management Resources and Technology Division (SMaRT) in WTB. This is consistent with FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act, as noted in this SORN.

There are two exemptions to the notification procedures. Under the authority granted to heads of agencies by 5 U.S.C. 552a(k), the FCC has determined that under 47 C.F.R. Section 0.561 the information contained in FCC/WTB-5 and FCC/WTB-6 SORNs is exempt from disclosing the notification procedures for these two SORNs.

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 ULS information, which is covered by FCC/WTB-1, “Wireless Services Licensing Records (ULS)” SORN may contact the Deputy Division Chief, Spectrum Management Resources and Technology Division (SMaRT) in WTB. This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

There are two exemptions to the record access procedures. Under the authority granted to heads of agencies by 5 U.S.C.552a(k), the FCC has determined that under 47 C.F.R. Section 0.561 the information contained in FCC/WTB-5 and FCC/WTB-6 SORNs is exempt from disclosing the record access procedures for these two SORNs.

- 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 ULS information system, which is covered by FCC/WTB-1, “Wireless Services Licensing Records (ULS)” SORN, may contact the Deputy Division Chief, Spectrum Management Resources and Technology Division (SMaRT) in WTB. This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

There are two exemptions to the procedures to contest records. Under the authority granted to heads of agencies by U.S.C. 552a(k), the FCC has determined under 47 C.F.R. Section 0.561 that the information contained in FCC/WTB-5 and FCC/WTB-6 SORNs is exempt from disclosing the procedures to contest records for these two SORNs.

- 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 ULS information system, which is covered by FCC/WTB-1, “Wireless Services Licensing Records (ULS)” SORN, may contact the the Deputy Division Chief, Spectrum Management Resources and Technology Division (SMaRT) in WTB who will explain the alternatives that are available to the individual. This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

There are two exemptions to the disclosure of the source(s) of records. Under the authority granted to heads of agencies by U.S.C. 552a(k), the FCC has determined under 47 C.F.R. Section

0.561 that the information contained in FCC/WTB-5 and FCC/WTB-6 SORNs is exempt from having to disclose the source(s) of records for these two SORNs

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 Spectrum Management Resources and Technology Division of WTB is incorporating FCC/WTB-5, "Application Review List for Present or Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly," and FCC/WTB-6, "Archival Radio Operator Records," into FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN. The sources for the categories of records in the FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, which covers the PII that is collected, used, and maintained by the ULS information system are being expanded to include the sources for the categories of records previously covered by the FCC/WTB-5 and FCC/WTB-6.

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/WTB-1, "Wireless Services Licensing Records (ULS)" SORN, which covers the personally identifiable information (PII) that individuals provide when they use the ULS information system does not claim any exemptions to the notification, access, and correction and/or amendment procedures as they apply to individuals seeking information about them in this SORN.

There are two exemptions from certain provisions of the Privacy Act: Information contained in FCC/WTB-5 and FCC/WTB-6 SORNs is exempt from sections (c)(3), (d), (e)(4)(G), (H), and (I), and (f) of the Privacy Act of 1974, 5 U.S.C. 552a, and from 47 C.F.R. 0.554 - 0.557 of the Commission's rules. These provisions concern the notification, record access, and contesting procedures described above, and also the publication of record sources. The information previously covered under FCC/WTB-5 and FCC/WTB-6 SORNs is exempt from these provisions because it contains the following types of information:

- (1) Investigative material compiled for law enforcement purposes as defined in Section (k)(2) of the Privacy Act;
- (2) Properly classified information, obtained from another Federal agency during the course of a personnel investigation, which pertains to national defense and foreign policy, as stated in Section (k)(1) of the Privacy Act; and

(3) Investigative material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment, as described in Section (k)(5) of the Privacy Act, as amended.

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 Spectrum Management Resources and Technology Division of WTB is incorporating FCC/WTB-5, "Application Review List for Present or Former Licensees, Operators, or Unlicensed Persons Operating Radio Equipment Improperly," and FCC/WTB-6, "Archival Radio Operator Records," into FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN. The staff in the Spectrum Management Resources and Technology Division (SMaRT) of WTB, which manages the ULS information, and the PII that it contains has posted notices that the PII in the information systems's electronic records and paper files covered by FCC/WTB-1 is "non public for internal use only." The SMaRT Division also issues reminders periodically to those granted access to the information that they are to keep the information confidential and to refrain from making any unauthorized disclosure of information.

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

- Six months or less
- One year
- Two years
- Three years
- Four years
- Five years
- Other audit scheduling procedure(s): The staff in the Spectrum Management Resources and Technology Division of WTB will ensure that the PII in the ULS information system , which is covered by FCC/WTB-1, "Wireless Services Licensing Records (ULS)" SORN will have an audit schedule that complies with FCC and OMB audit regulations.

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?

Risks:

- a. Some of the information system's personally identifiable information (PII) includes paper documents and microfiche 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. Since the ULS information system has links to other Federal agencies, i.e., Department of the Treasury, there may be potential processes and procedures that could lead to PII security breaches that have not been discovered and remedied.

Mitigating factors:

- a. PII that is contained in the paper documents and microfiche are 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. The Spectrum Management Resources and Technology Division (SMaRT) staff in WTB has various security procedures and practices in place and agreements with these Federal agencies to avoid any unintended breaches of PII.

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)?

Deficiencies:

- a. The ULS information system includes data that is submitted by the public-at-large, including individuals, businesses, vendors, institutions, contractors, etc. The FCC will need some way to verify that the information meets Data Quality guidelines.

Remedies:

- a. WTB 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 to insure that there is data accuracy to prevent fraud, etc. in these transactions between the ULS and other Federal agencies.

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

Initial implementation: October 2008

Secondary implementation:

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:

At this time, the Spectrum Management Resources and Technology Division (SMaRT) staff in WTB staff does not anticipate that there will be any new ancillary or auxiliary information systems linked to the ULS information system.