

Federal Communications Commission
Office of the Managing Director



**Privacy Impact Assessment¹ (PIA) for the
Equipment Authorizations Records and Files Information System**

September 14, 2009

FCC Bureau/Office: Office of Engineering and Technology (OET)
Division: Laboratory Division

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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 C.F.R. 552a, requires Federal agencies to take special measures to protect personal information about individuals when the agencies collect, maintain, and use such personal information.

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

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

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

Section 1.0 Information System's Contents:

1.1 Status of the Information System:

- New information system—Implementation date:
- Revised or upgraded information system—Revision or upgrade date: March 2009

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

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

Please explain your response:

The Office of Engineering and Technology (OET) is making various revisions to the Equipment Authorization Records and Files information system that is covered by the system of records notice (SORN) FCC/OET-2, "Equipment Authorization Records and Files." OET has upgraded parts of this information system and added a routine use, "breach notification," as required by OMB Memorandum M-07-16 (May 22, 2007).

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

- Yes
Date:
- No

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

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

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

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

- Yes
- No

If yes, please explain your response:

The Equipment Authorization Records and Files information system has never existed under another name nor has the name been changed since this SORN was published in the *Federal Register* on April 5, 2006.

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

- Yes
- No

If yes, please explain your response:

The staff in the Office of Engineering and Technology (OET) has updated the operating system, *etc.*, for the Equipment Authorization Records and Files information system.

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

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

- Yes
- No

If yes, please explain your response:

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

- Yes
- No

If yes, please explain your response:

The Equipment Authorization Records and Files information system, including the personally identifiable information (PII) covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, is a "stand alone" information system. It is also linked to the following FCC information systems:

- (1) Commission Registration System (CORES) through which individuals (and other entities, *i.e.*, businesses, institutions, and state and local governments, *etc.*) register with the Commission to obtain their FCC Registration Number (FRN) that is required to do business with the Commission; and
- (2) Revenue Accounting Management Information System (RMIS) through which registrants submit their payments and fees for application forms, licenses, transfers, special temporary authorities (STAs), equipment authorizations, *etc.* .

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

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

- Yes
- No

Please explain your response:

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

Information about FCC Employees:

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

- National security data
- Communications protected by legal privileges
- Digital signature
- Other information:

Information about FCC Contractors:

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

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

- Not applicable
- Individual's name:
- Other name(s) used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN:
- Race/Ethnicity
- Gender
- Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scans/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age:
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information
- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s):
- Personal fax number(s)
- Personal e-mail address(es):
- Emergency contact data:
- Credit card number(s)
- Driver's license number(s)
- Bank account(s)
- 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: Individuals who file FCC Form 731 and supporting exhibits and related documentation, *i.e.*, test reports and supporting documentation that demonstrate compliance with the technical rules for license transmitters and unlicensed devices in the Radio Frequency (RF) spectrum as required by 47 C.F.R. Parts 2, 15 and 18 of FCC rules, and certain licensed service regulations.

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

- Not applicable
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Business/office address
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits
- Credit card number(s)
- Bank account(s)
- Other information: Businesses that file FCC Form 731 and supporting exhibits and related documentation, *i.e.*, test reports and supporting documentation that demonstrate compliance with the technical rules for license transmitters and unlicensed devices in the Radio Frequency (RF) spectrum as required by 47 C.F.R. Parts 2, 15 and 18 of FCC rules, and certain licensed service regulations.

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: Individuals who have filed FCC Form 731, who may have included PII in their filings.
- Non-personal information from businesses and other for-profit entities: Self-employed and other individuals, *e.g.*, consultants, entrepreneurs, *etc.*, who file FCC Form 731, who may have included PII in their filings.
- Non-personal information from institutions and other non-profit entities:
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources:

1.10 Will the information system obtain, use, store, analyze, *etc.* information about individuals *e.g.*, personally identifiable information (PII), from other information systems, including both FCC and non-FCC information systems?

- Yes
- No

Please explain your response:

The Equipment Authorization Records and Files information system is linked to the Commission Registration System (CORES) and Revenue Accounting Management Information System (RMIS). Applicants who file FCC Form 731 must use CORES and RAMIS as follows:

- (1) The Commission Registration System (CORES) is the information system through which individuals (and other entities, *i.e.*, businesses, institutions, and state and local governments, *etc.*) register with the Commission to obtain their FCC Registration Number (FRN) that is required to do business with the Commission; and
- (2) The Revenue Accounting Management Information System (RMIS) is the information system through which registrants submit their payments and fees for application forms, licenses, transfers, STAs, equipment authorizations, *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?

- Not applicable
- FCC information system and information system name(s): Commission Registration System and Revenue Accounting Management Information System.
- FCC employee's name:
- (non-FCC employee) individual's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- Other Federal Government employee ID information, *i.e.*, badge number, *etc.*
- SSN: or a Taxpayer Identification Number (TIN) is required.
- Race/Ethnicity
- Gender
- U.S. Citizenship
- Non-U.S. Citizenship
- Biometric data
 - Fingerprints
 - Voiceprints
 - Retina scan/prints
 - Photographs
 - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/Age
- Place of birth
- Medical data
- Marital status
- Spousal information
- Miscellaneous family information:

- Home address
- Home address history
- Home telephone number(s)
- Personal cell phone number(s)
- Personal fax number(s)
- Personal e-mail address(es)
- Emergency contact data
- Credit card number(s)
- Driver's license
- Bank account(s)
- Non-FCC personal employment records
- Non-FCC government badge number (employee ID)
- Law enforcement data
- Military records
- National security data
- Communications protected by legal privileges
- Financial history
- Foreign countries visited
- Background investigation history
- Digital signature
- Other information: The CORES information system provides the individual (and all other entities, *i.e.*, businesses, institutions, *etc.*) with a FCC Registration Number (FRN) when they register with the FCC. The FRN is required to conduct all business with the FCC. The FRN obviates the need to provide an individual's Social Security Number (SSN) or Taxpayer Identification Number (TIN). The RMIS information is the mechanism by which individuals (and all other entities) make payments to the FCC for licenses, equipment authorizations, fees, *etc.* As with all other transactions and any other activities, these all require the FRN.

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

- Not applicable
- Non-FCC information system and information system name(s):
- Name of business contact/firm representative, customer, and/or others
- Race/Ethnicity
- Gender
- Full or partial SSN:
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional affiliations
- Intra-business office address (office or workstation)
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business e-mail address(es)
- Bill payee name
- Bank routing number(s)
- Income/Assets
- Web navigation habits
- Commercially obtained credit history data
- Commercially obtained buying habits

- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information:

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

- Yes
- No

Please explain your response:

As noted above, the links to CORES and RMIS are used to register to conduct business and other transactions with the FCC, including paying fees, *etc.* The links to CORES and RAMIS also provide a means by which the Office of Engineering and Technology can determine whether the registrant/applicant/licensee is in compliance with FCC financial rules and regulations as part of the equipment authorization process.

However, there is no exchange or transmission of PII between this information system and the CORES and RMIS information systems because the FCC uses the FRN in place of PII to identify each individual (and all other entities that conduct business with the FCC) and to flag any registrant/applicant/licensee who is not in compliance with FCC financial rules and regulations and/or has not paid their fees.

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:

Information in the Equipment Authorization Records and Files information system, including the PII covered by OET-2, "Equipment Authorization Records and Files" SORN, can be retrieved by an individual's name, (personal) e-mail address, and (personal) telephone number, *etc.*

However, there is no exchange or transmission off PII between this information system and the CORES and RMIS information systems because the FCC uses the FRN in place of PII to identify each individual (and all other entities that conduct business with the FCC) and to flag any registrant/applicant/licensee who is not in compliance with FCC financial rules and regulations and/or has not paid their fees.

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

- Yes
- No

Please explain your response:

The Equipment Authorization Records and Files information system is used to make a determination of whether equipment that is proposed for marketing complies with:

- (1) the FCC's administrative and technical requirements for radio frequency (RF) equipment standards; and/or
- (2) the interference potential for equipment operating in both the licensed and unlicensed radio services. Any PII relates to contact information for the equipment proposed for marketing.

The links that the Equipment Authorization Records and Files information system has with CORES and RMIS enables the OET staff to determine if the registrant/applicant/licensee complies with FCC financial rules and regulations, including if the applicant is current with any fees, *etc.*

- 1.15 Under the *Privacy Act of 1974*, as amended, 5 C.F.R. 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/OET-2, "Equipment Authorization Records and Files," was published in the *Federal Register* on April 5, 2006.

Please provide the citation that was published in the *Federal Register* for the SORN: 71 FR 17234, 17242.

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,”² are those instances that permit the FCC to disclose information from a SORN to specific “third parties.” These disclosures may be for the following reasons:

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

(check all that are applicable)

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

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

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 Equipment Authorization Records and Files information system and to the personally identifiable information (PII) that it collects, uses, and maintains, which is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN.

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

- Yes
- No

Please explain your response:

The information, including the PII that is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, is located in the Office of Engineering and Technology, Laboratory Division, Federal Communications Commission (FCC), 7435 Oakland Mills Road, Columbia, Maryland 21046.

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/OET-2, "Equipment Authorization Records and Files" SORN, include individuals who have applied for or been granted an authorization to market equipment using the Radio Frequency (RF) spectrum, in accordance with 47 C.F.R. Part 2 of the FCC's rules.

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 that are covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, include:

- (1) Information that applicants provide on FCC Form 731, Application for Equipment Authorization;
- (2) Information contained in any supporting exhibits, inquiries or responses submitted by the applicant(s); and
- (3) Test reports and other supporting documentation that demonstrate compliance with the technical rules for licensed transmitters and unlicensed devices in the Radio Frequency (RF) Spectrum as required by 47 C.F.R. Parts 2, 15 and 18 of FCC rules, and certain licensed service regulations.

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 PII covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, is 47 U.S.C. 308.

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, in FCC/OET-2, "Equipment Authorization Records and Files" SORN, are:

- (1) To make a determination of compliance with equipment proposed for marketing with the administrative and technical requirements of the FCC as they relate to equipment using the radio frequency (RF) spectrum; and
- (2) To determine the interference potential of equipment proposed for marketing with that of equipment currently operating in both the licensed and unlicensed radio services.

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

- Yes
- No

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

- Adjudication and litigation:
- Committee communications and reporting:
- Compliance with welfare reform requirements:
- Congressional inquiries:
- Emergency response by medical personnel and law enforcement officials:
- Employment, security clearances, licensing, contracts, grants, and other benefits by the FCC:
- Employment, security clearances, licensing, contracts, grants, and other benefits upon a request from another Federal, state, local, tribal, or other public authority, *etc.*:
- FCC enforcement actions:
- Financial obligations under the Debt Collection Act:
- Financial obligations required by the National Finance Center:
- First responders, *e.g.*, law enforcement, DHS, FEMA, DOD, NTIA, *etc.*:
- Government-wide oversight by NARA, DOJ, and/or OMB:
- Labor relations:
- Law enforcement and investigations:
- Program partners, *e.g.*, WMATA:
- Breach of Federal data: OMB Memorandum M-07-16 (May 22, 2007).
- Others Routine Use disclosures not listed above: Public access.

2.8 Have there been any changes as to whether the FCC will permit the information covered by the system of records notice (SORN) can be disclosed to consumer reporting agencies?

- Yes
- No

Please explain your response:

Information in the Equipment Authorization Records and Files information system, including the PII covered by FCC/OET-2, “Equipment Authorization Records and Files” SORN, is not disclosed to any consumer reporting agencies.

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

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:

As required by 47 C.F.R. Section 2.913(a) of FCC rules, all information, *e.g.*, FCC Form 731, "Applications for Equipment Authorization," and all supporting exhibits submitted by the applicant(s), and other documentation including test reports and supporting records, data, *etc.*, which are submitted to the Equipment Authorization Records and Files information system, including the PII that is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, must be filed electronically via the Internet. The information (electronic records and data) is stored in the FCC's equipment authorization system computer databases.

2.10 Have there been any changes to how the information covered by the system of records notice (SORN) is retrieved or otherwise accessed?

- Yes
 No

Please explain your response:

Information in the Equipment Authorization Records and Files information system, including the PII covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, consists of scanned images, electronic records of data elements, and electronic copies of granted licenses, *etc.*. The information may be retrieved from the OET Laboratory Division Electronic Filing Site at: <https://fjallfoss.fcc.gov/oetcf/eas/index.cfm> by clicking on the desired link in the "Reports" section on the left hand side of the page.

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:

All information is available to the public except files not routinely made publicly available under 47 C.F.R. § 0.457 or those where a request for confidentiality is pending or has been granted under 47 C.F.R. § 0.459.

Access to information that:

- (1) is not routinely made publicly available, including personally identifiable information, and/or
- (2) concerns those with a pending or granted request for confidentiality, is restricted to OET supervisors and employees and/or contractors.

Other FCC employees and contractors may be granted access on a "need to know" basis as dictated by their job duties and responsibilities.

The information, *e.g.*, electronic records, files, and data, *etc.*, in the FCC's OET Laboratory computer network databases is secured through controlled access and passwords restricted to OET administrative staff. The computer terminals are located in non-public rooms that are locked outside of business hours. The information that is resident on the network servers is

backed-up routinely to magnetic media including a Storage Area Network (SAN). Back-up tapes are stored on-site, and the SAN is the responsibility of FCC Headquarters.

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 Performance Evaluation and Records Management Division of Office of Managing Director (OMD-PERM) has not determined a records retention schedule for the Equipment Authorization Records and Files information system's electronic data, including the PII that is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN. No records (electronic data and files) will be destroyed until a disposal schedule is approved by the National Archives and Records Administration (NARA).

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: OET supervisory staff has responsibility for access and proper use of the information in the Equipment Authorization Records and Files information system.
- FCC staff in other bureaus/offices:
- Information system administrator/Information system developers:

- Contractors:
- Other information system developers, *etc*:

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

Access to the information, *i.e.*, electronic records and data, that are stored on the FCC's OET Laboratory computer network databases is restricted to the OET supervisors and staff. Other FCC employees and contractors working at the FCC may have access on a "need to know" basis as dictated by their job duties and responsibilities.

3.5 How much access will users have to data in the information system(s)?

- Access to all data:
- Restricted access to data, as determined by the information system manager, administrator, and/or developer: OET employees and contractors may be granted access on a "need-to-know" basis as dictated by their job duties and responsibilities.
- Other access policy:

3.6 Based on the Commission policies and procedures, which user group(s) may have access to the information at the FCC:

(Check all that apply and provide a brief explanation)

- Information system managers: OET supervisory staff.
- Information system administrators: FCC employees and contractors who manage the IT systems that hold and process the PII electronic data.
- Information system developers:
- FCC staff in this bureau/office: OET employees are granted access on a "need to know" basis.
- FCC staff in other bureaus/offices:
- FCC staff in other bureaus/offices in FCC field offices:
- Contractors: Contractors working at the FCC are granted access on a "need to know" basis.
- Other Federal agencies:
- State and/or local agencies:
- Businesses, institutions, and other groups:
- International agencies:
- Individuals/general public:
- Other groups:

3.7 If contractors are part of the staff in the FCC who collect, maintain, and access the information, does the IT supervisory staff ensure that contractors adhere fully to the Privacy Act provisions, as required under subsection (m) of the Privacy Act, as amended, 5 C.F.R. 552a(m)?

- Yes
- No

Please explain your response:

The OET supervisory staff provides periodic privacy training to the IT contractors who handle the PII contained in the Equipment Authorization Records and Files information system.

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

- Yes
- No

Please explain your response:

In the future, OET will insure that its contracts covering contractors who have access to the information in the Equipment Authorization Records and Files information system, including the PII covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, include the required FAR clauses.

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

- Yes
- No

Please explain your response:

The Equipment Authorization Records and Files information system, including the PII covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, is linked to the FCC's Commission Registration System (CORES), which individuals must use to register to do business with the Commission, and to the FCC's Revenue Accounting Management Information System (RMIS) to pay registration, licensing, equipment authorization, and all other fees and payments. These two links provide a means to determine if the registrant, applicant, and/or licensee are in compliance with FCC financial rules and regulations and/or has paid their fees to the Commission.

However, because the FCC uses the FRN to identify each individual (and all other entities conduct business with the FCC), there is no transmission or exchange of personally identifiable information (PII).

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

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

3.11 If there is such transmission/sharing of personal information, how is the information secured for transmission—what security measures are used to prevent unauthorized access during transmission, *i.e.*, encryption, *etc.*?

3.12 If there is sharing or transmission to other information systems, with what other non-FCC organizations, groups, and individuals will the information be shared?
(Check all that apply and provide a brief explanation)

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

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

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

3.14 Is this a new or a renewed matching agreement?

- New matching agreement
- Renewed matching agreement

Please explain your response:

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

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

Please explain your response:

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

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

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

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

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

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

Please explain any exceptions or clarifications:

The information contained in the Equipment Authorization Records and Files information system, including the PII covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, that applicants submit to the FCC on FCC Form 731 and accompanying attachments, test reports, and other supplementary documents, *etc.*, comes from non-FCC sources.

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 have applied for or been granted an authorization to market equipment using the RF spectrum.
 - Information is processed and maintained only for the purposes for which it is collected:
 - Information is reliable for its intended use(s):
 - Information is accurate:
 - Information is complete:
 - Information is current:
- No information comes from non-FCC sources:

Please explain any exceptions or clarifications:

The FCC's Office of Engineering and Technology (OET) reviews all applications submitted on FCC Form 731 and all accompanying attachments, documents, test results, and other supplementary materials, *etc.*, to insure that the equipment complies with FCC regulations before OET issues an authorization to market the equipment. The Data Quality guidelines are among the criteria that OET uses to evaluate the equipment for compliance.

In addition, Section III of FCC Form 731 includes a Certification section that applicants must sign, which states that: Willful false statements made on this form are punishable by fine and imprisonment under 18 U.S.C. 1001, and/or revocation of any station license or construction permit under 47 U.S.C. 312(a)(1) and/or forfeiture under 47 U.S.C. 503.

The Certification section ensures that all information that registrants submit via FCC Form 731 and all accompanying documentation and data is reliable, accurate, complete, and current.

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

- 4.3 If the information that is covered by this system of records notice (SORN) is being aggregated or consolidated, what controls are in place to insure that the information is relevant, accurate, and complete?
- 4.4. What policies and procedures do the information system's administrators and managers use to insure that the information adheres to the Data Quality guidelines both when the information is obtained from its sources and when the information is aggregated or consolidated for the use by the bureaus and offices?
- 4.5 How often are the policies and procedures checked routinely—what type of annual verification schedule has been established to insure that the information that is covered by this system of records notice adheres to the Data Quality guidelines?

As noted above, the FCC's Office of Engineering and Technology (OET) reviews all applications and accompanying supplementary materials and documents, *etc.*, to insure that the equipment complies with FCC regulations before the equipment receives its marketing authorization. The Data Quality guidelines are among the criteria that OET uses to evaluate these equipment authorization applications, and the OET Equipment Authorization information system provides a link at: <http://www.fcc.gov/omd/dataquality> to the FCC's Information Quality Guidelines in which the FCC explains that its guidelines substantially follow the OMB Data Quality Guidelines.

The information contained in the Equipment Authorization Records and Files information system does not require a specific annual verification schedule. The OET staff reviews each submission for accuracy, currency, and completeness. The "filing options" that a registrant and/or applicant may need, *i.e.*, FCC Forms 731 carries the following notice:has various other legal, engineering, and regulatory criteria, *etc.*

Furthermore, as also noted above, Section III of FCC Form 731 includes a Certification section that applicants must sign with a warning that:

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, § 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code Title 47, § 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, § 503).

Section 5.0 Safety and Security Requirements:

- 5.1 How are the records/information/data in the information system covered by this system of records notice (SORN) stored and maintained?
- IT database management system (DBMS)
 - Storage media including CDs, CD-ROMs, *etc.*
 - Electronic tape
 - Paper files
 - Other:

5.2 Is the information collected, stored, analyzed, or maintained by this information system available in another form or from another source (other than a “matching agreement” or *MOU*, as noted above)?

- Yes
 No

Please explain your response:

The information that the Equipment Authorization Records and Files information system collects, uses, analyzes, and maintains, including the PII that is covered by FCC/OET-2, “Equipment Authorization Records and Files” SORN, is obtained from the information that applicants submit to the FCC with their FCC Form 731 Equipment Authorization form and accompanying documents and related materials. The filings are from non-FCC related sources.

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

- Yes
 No

Please explain your response:

The Equipment Authorization Records and Files information system, which includes the PII covered by FCC/OET-2, “Equipment Authorization Records and Files” SORN, is basically a "stand alone" information. This information system is linked to other FCC information systems because applicants who file FCC Form 731 must use the CORES and RMIS information systems as follows:

- (1) The Commission Registration System (CORES) is the information system through which individuals (and other entities, *i.e.*, businesses, institutions, and state and local governments, *etc.*) register with the Commission to obtain their FCC Registration Number (FRN) that is required to do business with the Commission; and
- (2) The Revenue Accounting Management Information System (RAMIS) is the information system through which registrants submit their payments and fees for application forms, licenses, transfers, STAs, equipment authorizations, *etc.*

However, as noted in several questions above, once registered, applicants filing FCC Form 731 use their FRN to conduct business with the Commission, which obviates the need for the electronic transmission of any PII thereafter..

If this information system is not part of another FCC information system, please skip to Question 5.7.

5.4 If the information system (under review here) has personally identifiable information (PII) and is part of another FCC information system, is there a transfer of records/data/information between these two FCC information system(s)?

- Yes
 No

Please explain your response:

5.5 If the information system's personally identifiable information (PII) is part of another FCC information system, does the information system have processes and/or applications that are part of those from the other FCC information systems?

- Yes
 No

Please explain your response:

5.6 If either or both such situations, as noted in Questions 5.4 and 5.5 exist, what security controls are there to protect the PII information and to prevent unauthorized access?

- Not applicable.

Please explain your response:

5.7 Would the unavailability of this information system prevent the timely performance of FCC operations?

- Yes
 No

Please explain your response:

The Equipment Authorization Records and Files information system performs a necessary function for the Commission. The Office of Engineering and Technology (OET) uses this information system to collect, store, analyze, and use the data that applicants submit with FCC Form 731 and the accompanying exhibits, test reports, and other supporting documentation for their RF equipment, for which they are seeking FCC authorization that will allow the applicants to market their equipment in the United States.

OET reviews the equipment authorization application to determine if it complies with technical rules for licensed transmitters and unlicensed devices, as required by FCC rules.

Without this information system, the OET would lack a means to collect and analyze the application's data to determine whether the subject equipment meets the regulatory and technical standards.

Thus, this information system is used by the FCC in its mission to carry out its regulatory responsibilities under the Communications Act of 1934 and other statutory authorities.

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:

Although the FCC requires that all equipment authorizations must be done entirely through the OET Equipment Authorization Electronic Filing World Wide Web site at: <https://fjallfoss.fcc.gov/oetcf/eas/index.cfm>, the FCC has various safeguards in place to protect

the security and integrity of the Commission's electronic submission process for equipment authorization applications as stated on the FCC's privacy policy webpage:

[The FCC]...use[s] commercial encryption techniques to protect the transmission and storage of the information you submit to us when you use one of our secure online forms. E-mail that you send to us is not necessarily secure against third-party interception or misdirection. For your own protection, you may wish to communicate sensitive information using a method other than e-mail.

For website security purposes and to ensure that our website remains available to all users, FCC computer systems that support the website use industry-standard methods and software to monitor and audit network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Anyone visiting our website expressly consents to such monitoring and auditing.

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: The link to the FCC Privacy Policy is located at the bottom of the Equipment Authorization webpage at: <http://www.fcc.gov/fccprivacypolicy.html>.
- Privacy notice displayed on the webpage:
- Privacy notice printed at the end of the form or document: FCC Form 731 carries 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 Website not on www.fcc.gov or other URL?

- Yes
- No

Please explain your response:

If the information is collected by some method or mechanism in addition to or 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 website via the FCC Intranet for FCC employees and contractors working at the FCC, does this website(s) have a Privacy Act Notice and how is it displayed?

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

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

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

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

Please explain your response:

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

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

- Privacy notice is on the document, *e.g.*, FCC form, *etc.*
- 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's policy in regard to the "Interaction With Children" on the Commission's websites is as follows:

[The FCC's]...[w]ebsite 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 Equipment Authorization Records and Files information system, including the PII that is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, contains the information that applicants submit, *i.e.*, FCC Form 731, "Application for Equipment Authorization" and any supporting documentation, which OET uses to conduct its review, analysis, and determination of whether the equipment complies with FCC regulations governing the technical rules for licensed transmitters and unlicensed devices in the RF spectrum and whether the applicant/licensee has made requisite FCC fees and payments as part of the approval process.

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

- Yes
- No

Please explain your response:

Individuals who submit applications on FCC Form 731 and provide the accompanying supporting documentation are required to provide minimal PII, which is stored in the FCC's Equipment

Authorization Records and Files information system, including the PII that is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN. OET needs this minimal PII from individuals for identification purposes related to the OET staff's review and processing of the individual's application for equipment authorization.

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

- Yes
 No

Please explain your response:

Individuals who submit applications on FCC Form 731 and provide the accompanying supporting documentation are required to provide minimal PII, which is stored in the FCC's Equipment Authorization Records and Files information system, including the PII that is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN. OET needs this minimal PII from individuals for identification purposes related to the OET staff's review and processing of the individual's application for equipment authorization.

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

5.20 If individuals have the right to consent to the use of their personal information, how does the individual exercise this right?

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

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

- Yes
 No

Please explain your response:

The Equipment Authorization Records and Files information system does not produce any reports on any PII pertaining to applicants, licensees, or filers. This information in the Equipment Authorization Records Files information system is used as follows:

- (1) To make a determination of compliance with equipment proposed for marketing with the administrative and technical requirements of the FCC as they relate to equipment using the radio frequency (RF) spectrum; and
- (2) To determine the interference potential of equipment proposed for marketing with that of equipment currently operating in both the licensed and unlicensed radio services.

5.23 What safeguards and security measures, including physical and technical access controls, are in place to secure the information and to minimize unauthorized access, use, or dissemination of the information that is stored and maintained in the information system?
(Check all that apply)

- Account name
- Passwords
 - Accounts are locked after a set period of inactivity
 - Passwords have security features to prevent unauthorized disclosure, *e.g.*, “hacking”
 - Accounts are locked after a set number of incorrect attempts
 - One time password token
 - Other security features:
- Firewall
- Virtual private network (VPN)
- Data encryption:
- Intrusion detection application (IDS)
- Common access cards (CAC)
- Smart cards:
- Biometrics
- Public key infrastructure (PKI)
- Locked file cabinets or fireproof safes
- Locked rooms, with restricted access when not in use
- Locked rooms, without restricted access
- Documents physically marked as “sensitive”
- Guards
 - Identification badges
 - Key cards
 - Cipher locks
 - Closed circuit TV (CCTV)
- Other:

5.24 Please explain what staff security training and other measures are in place to assure that the security and privacy safeguards are maintained adequately?

All FCC employees and contractors who work with the information that is collected, used, stored and maintained in the Equipment Authorization Records and Files information system, including the PII that is covered by FCC/OET-2, “Equipment Authorization Records and Files” SORN, are required to complete privacy training. In addition the OET staff provides various notices and warnings to the employees and contractors who have access that the PII is not to be shared or disclosed without authorization.

5.25 How often are security controls reviewed?

- Six months or less:
- One year: The OET staff reviews the security controls in the Equipment Authorization Records and Files information system at least annually.
- Two years
- Three years
- Four years
- Five years
- Other:

5.26 How often are personnel (information system administrators, users, information system/information system developers, contractors, *etc.*) who use the information system trained and made aware of their responsibilities for protecting the information?

- There is no training
- One year: In September 2006, the FCC inaugurated a Commission-wide privacy training program, which has required all FCC employees and contractors to complete an initial privacy training course when joining the Commission. FCC employees and contractors must take a privacy refresher course annually thereafter as required by the Office of Management and Budget (OMB).
- Two years
- Three years
- Four years
- Five years
- Other:

If privacy training is provided, please skip to Question 5.28.

5.27 What are the safeguards to insure that there are few opportunities for disclosure, unavailability, modification, and/or damage to the information system covered by this system of records notice (SORN), and/or prevention of timely performance of FCC operations if operational training is not provided?

5.28 How often must staff be “re-certified” that they understand the risks when working with personally identifiable information (PII)?

- Less than one year:
- One year: The OET staff requires that the FCC employees and contractors who have access to the data in the Equipment Authorization Records and Files information system must be trained at once a year about their responsibilities for protecting the PII contained in the information system.
- Two years
- Three or more years
- Other re-certification procedures:

5.29 Do the Commission’s training and security requirements for this information system that is covered by this system of records notice (SORN) conform to the requirements of the Federal Information Security Management Act (FISMA)?

- Yes
- No

Please explain your response:

The FCC's training and security requirements comply with FISMA regulations.

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

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

- Results in little or no harm, embarrassment, inconvenience, or unfairness to the individual.
- Results in moderate harm, embarrassment, inconvenience, or unfairness to the individual.
- Results in significant harm, embarrassment, inconvenient, or unfairness to the individual.

Please explain your response:

The Equipment Authorization Records and Files information system requires individuals to provide only minimal PII with their applications, *i.e.*, their name and address, which is necessary for the FCC staff to identify each individual who is submitting an application for equipment authorization.

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 Equipment Authorization Records and Files information system, and which is covered by FCC/OET-2, "Equipment Authorization Records and Files" 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 for the Equipment Authorization Records and Files information system was completed in March 2009 as part of the three year review and approval cycle.

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 Equipment Authorization Records and Files information system does not include any smart cards or other technologies that the FCC has not used previously.

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

The Equipment Authorization Records and Files information system has minimal impact on the privacy of individuals who file applications for equipment authorization using FCC Form 731. The FCC requires that individuals provide only minimal PII so that the OET staff can process the applications. Otherwise, individuals who are applicants/registrants/licensees must use their FCC Registration Number (FRN) to conduct business with the FCC. The FRN obviates the need for individuals to provide additional 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 Equipment Authorization Records and Files information system purposes are to use the information that individuals provide on their applications for equipment authorization:

- (1) to make a determination whether the equipment that is proposed for marketing meets the FCC's administrative and technical requirements for equipment using the RF spectrum; and
- (2) to determine the equipment's interference potential with equipment operating in both the licensed and unlicensed radio services.

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:

The Equipment Authorization Records and Files information system, including the PII that is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, uses FCC Form 731, "Application for Equipment Authorization."

- 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:

FCC Form 731 has been approved by the Office of Management and Budget (OMB) as part of the FCC's information collection budget as required by the Paperwork Reduction Act.

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):

3060-0057, Equipment Authorization Form, FCC Form 731.

- 6.4 If there are any FCC forms associated with the information system(s) covered by this system of records notice (SORN), do the forms carry the Privacy Act notice?

- Yes: FCC Form 731 carries a Privacy Act 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 OET staff has coordinated the PRA requirements with PERM.

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 Equipment Authorization Records and Files information system, which is covered by the FCC/OET-2, “Equipment Authorization Records and Files” SORN, contains information about them may address their inquiries to the system manager in the Office of Engineering and Technology (OET). This is consistent with FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act, as noted in this SORN.

7.2 Are the procedures for individuals to gain access to their own records/information/data in this information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.554 – 0.555 for the Privacy Act and Freedom of Information Act (FOIA) requirements?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals who seek access to the information about them that is contained in the Equipment Authorization Records and Files information system, and which is covered by FCC/OET-2, “Equipment Authorization Records and Files” SORN, may address their inquiries to the system manager in the Office of Engineering and Technology(OET). This is consistent with FCC policies and rules under 47 CFR §§ 0.554 – 0.555, as noted in the SORN.

7.3 Are the procedures for individuals seeking to correct or to amend records/information/data about them in the information system that is covered by this system of records notice (SORN) consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

- Yes
- No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

Individuals seeking to correct or to amend information about them in the Equipment Authorization Records and Files information system, which is covered by FCC/OET-2, “Equipment Authorization Records and Files” SORN, may address their inquiries to the system manager in the Office of Engineering and Technology (OET). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

7.4 Does the FCC provide any redress to amend or correct information about an individual covered by this system of records notice (SORN), and if so, what alternatives are available to the individual, and are these consistent with the FCC Privacy Manual procedures and FCC rules under 47 CFR §§ 0.556 – 0.558?

- Yes
 No

Please explain your response:

Individuals seeking any redress to amend or to correct information about them in the Equipment Authorization Records and Files information system, which is covered by FCC/OET-2, “Equipment Authorization Records and Files” SORN, may address their inquiries to the system manager in the Office of Engineering and Technology (OET). This is consistent with FCC policies and rules under 47 CFR §§ 0.556 – 0.558, as noted in the SORN.

If this is a new system of records notice (SORN), please skip to Question 7.6.

7.5 Have the sources for the categories of records in the information system(s) covered by this system of records notice (SORN) changed?

- Yes
 No

Please explain your response, and if this is an existing system of records notice (SORN), please specify what, if anything, is changing in this procedure:

The sources for the categories of records in the FCC/OET-2, “Equipment Authorization Records and Files” SORN, which covers the PII that is collected, used, and maintained by the Equipment Authorization Records and Files information system remain unchanged. These record sources are:

- (1) FCC Form 731, "Application for Equipment Authorization;"
- (2) Supporting exhibits, test results, and related documentation, all of which may be submitted with the application to demonstrate compliance with the technical rules for licensed transmitters and unlicensed devices as required by FCC Rules under 47 C.F.R. Parts 2, 15 and 18.

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/OET-2, “Equipment Authorization Records and Files” SORN, does not claim any exemption to the notification, access, and correction, and/or amendment procedures as they apply to individuals seeking information about themselves in this SORN.

7.7 What processes are in place to monitor and to respond to privacy and/or security incidents? Please specify what is changing if this is an existing system of records notice (SORN) that is being updated or revised?

The OET supervisors issue periodic reminders to their employees and contactors that the information in the Equipment Authorization Records and Files information system's electronic database, which is covered by FCC/OET-2, "Equipment Authorization Records and Files" SORN, is "non public for internal use only." The OET supervisors also notify those granted access to the information that they are to keep the information confidential and to safeguard any printed materials.

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

- Six months or less
- One year
- Two years
- Three years
- Four years
- Five years
- Other audit scheduling procedure(s): The OET staff reviews components of the Equipment Authorization Records and Files information system as part of the bureau's Paperwork Reduction Act (PRA) review of its information collections.

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:	Mitigating factors:
<p>a. Some of the information in the Equipment Authorization Records and Files information system's personally identifiable information (PII) is contained in electronic records that are stored in the OET Laboratory's computer network databases.</p>	<p>a. PII that is contained in the electronic records is protected in the OET Laboratory's computer network databases, which require users to provide log-ins, passwords, and other access rights and security measures that are designed to protect these records.</p>
<p>b. Individuals who file applications on FCC Form 731 using the OET Equipment Authorization Electronic Filing World Wide Web site are members of the public-at-large. The FCC may need to verify that applications and the accompanying documentation are valid.</p>	<p>b. The OET reviews each application, including FCC Form 731 and supporting documentation to insure that the application and the accompanying materials meet the criteria for Commission approval of the equipment authorization. Failure to comply with the FCC regulations will result in the application's disapproval.</p>

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

Initial implementation: April 2006
 Secondary implementation: September 2009
 Tertiary implementation:
 Other implementation:

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

- Yes
- No

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

At this time, the OET staff does not anticipate that there will be any new ancillary or auxiliary information systems linked to the Equipment Authorization Records and Files information system.