

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



**Privacy Threshold Analysis (PTA)<sup>1</sup>**  
**Broadband Dead Zone Report and Consumer Broadband Test**  
**May 2010**

**FCC Bureau/Office: Office of Strategic Planning and Policy Analysis**  
**Division: Information Technology Center - Broadband Task Force**

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<sup>1</sup> This form is used to determine whether this information system requires a Privacy Impact Assessment.

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.

The E-Government Act of 2002 defines an information technology and/or system by reference to the definition sections of Titles 40 and 44 of the United States Code (U.S.C.). The following summarize these definitions:

- “Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. *See* 40 U.S.C. 11101(6).
- “Information System” means a discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information. *See* 44 U.S.C. 3502(8).

It is important, therefore, that when the FCC develops or makes changes to its information systems, the FCC should analyze what information the system will collect and maintain to determine whether there are any privacy issues.

The purpose of the **Privacy Threshold Analysis (PTA)** is to help the FCC’s bureaus/offices evaluate the information/data in the system and make the appropriate determination about how to treat the information/data, as required by the Privacy Act’s regulations.

Thus, the Privacy Threshold Analysis helps the bureaus and offices to determine if the data in the information system include information about individuals, *e.g.*, personally identifiable information (PII), which will require a **Privacy Impact Assessment (PIA)** to be conducted.

## Section 1.0 Information System’s Status:

### 1.1 Status of the Information System:

- New information system—Implementation date: March 2010
- Revised or upgraded information system—Revision or upgrade date: May 2010

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

- Placed in existing information system—Implementation Date: May 2010
- Placed in new auxiliary /ancillary information system—Date:
- Other use(s)—Implementation Date:

Please explain your response:

The FCC' Broadband Task Force has created the "Broadband Dead Zone Report and Consumer Broadband Test"<sup>2</sup> as part of the Commission's broadband plan and map implementation program. The Broadband Dead Zone Report will help determine the access of US residents to broadband--cable and DSL, fiber, mobile wireless, and other broadband services, and will gather data on the

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<sup>2</sup> This broadband survey and speed test were previously titled: "Public Registry of Broadband Availability Consumer Information" Survey and the "Broadband Quality Test," when they were approved on February 8, 2010, *see* 74 FR 69097.

quality of the broadband services being provided. The Consumer Broadband Test permits users, *e.g.*, individuals, to measure the quality of their fixed or mobile Internet broadband connection.

If this is a new information system, please skip to Question 1.6.

1.2 Has this information system existed under another name, or has the name been changed or modified?

- Yes
- No

Please explain your response:

1.3 Has this information system existed previously or been operated under any other software program, information system medium, *i.e.*, electronic database or paper files, and/or other format?

- Yes
- No

Please explain your response:

1.4 Has this information system existed under a system of records notice (SORN) by itself, or was it ever part or component of another SORN?

- Yes
- No

Please explain your response:

1.5 Is this information system being changed or upgraded, and if so, what are the purposes for changing or upgrading the information system, and/or will any changes now include personally identifiable information (PII):

- Yes
- No

Please explain your response:

1.6 Why is the information being collected, *e.g.*, what are the information system's purposes, intended uses, and/or functions:

As noted above, the "Broadband Dead Zone Report and Consumer Broadband Test" are part of the Commission's broadband plan and map implementation program. The Report will determine the access of US residents to broadband--cable, and DSL, fiber, mobile wireless, and other broadband services, and will gather data on the quality of the broadband services being provided. The Consumer Broadband Test permits users, *e.g.*, individuals, to measure the quality of their fixed or mobile Internet broadband connection.

Individual street addresses will not be made public, but aggregate or anonymous data from the database may be made public. These data may be used to inform implementation of the National

Broadband Plan, the National Broadband Map, and other proceedings related to the provisioning of broadband services.

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

**Information about FCC Employees:**

- No FCC employee(s) data
- FCC employee's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC badge number (employee ID)
- SSN
- US Citizenship
- Non-US Citizenship
- Race/ethnicity
- Gender
- Biometric data
  - Fingerprints
  - Voice prints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data
- 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 personal/background information:

**Information about FCC Contractors:**

- No FCC contractor information
- Contractor's name
- Other names used, *i.e.*, maiden name, *etc.*
- FCC Contractor badge number (Contractor ID)
- SSN
- US Citizenship
- Non-US Citizenship
- Biometric data
  - Fingerprints
  - Voice prints
  - Retina scan/prints
  - Photographs
  - Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*
- Birth date/age
- Place of birth
- Medical data
- 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 personal/background 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 must provide their home address to participate in the broadband survey and broadband quality test. Additionally, the Consumer Broadband Test also collects the Internet Protocol (IP) Address of each user (individual) who selects to participate.

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

- Not applicable
- Name of business contact/firm representative
- 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 cubical number)
- 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
- Personal clubs and affiliations
- Credit card number(s)
- Bank account(s)
- Other information: Users may submit business addresses and/or access the Consumer Broadband Test from a place of business or institution, *i.e.*, schools, *etc.* In doing so, users must provide their current address to participate in the broadband survey and broadband quality test. Additionally, the Consumer Broadband Test also collects the Internet Protocol (IP) address of each user (individual computer) who selects to participate

**“Non-personal” information obtained from FCC sources:**

- Not applicable
- Economic data
- Engineering/scientific data
- Accounting/financial data
- Legal/regulatory/policy data
- Other information:

**Miscellaneous Business, Technology, or Other Information:**

- Not applicable
- Not publicly available business or technology data, *i.e.*, trade or propriety information
- Other information, please specify:

1.8 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: Users who participate in the Broadband Dead Zone Report and Consumer Broadband Test.
- Non-personal information from businesses and other for-profit entities: Users who participate in the Broadband Dead Zone Report and Consumer Broadband Test.
- Non-personal information from institutions and other non-profit entities: Users who participate in the Broadband Dead Zone Report and Consumer Broadband Test.
- Non-personal information from farms: Users who participate in the Broadband Dead Zone Report and Consumer Broadband Test
- Non-personal information from Federal Government agencies: Users who participate in the Broadband Dead Zone Report and Consumer Broadband Test
- Non-personal information from state, local, or tribal governments: Users who participate in the Broadband Dead Zone Report and Consumer Broadband Test
- Other sources, please specify: Users who participate in the Broadband Dead Zone Report and Consumer Broadband Test

- 1.9 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 "Broadband Dead Zone Report and Consumer Broadband Test" information system is a "stand alone" information system with no electronic links to other FCC or non-FCC information systems.

If this information system is a "stand alone" information system, *e.g.*, it does not use information from another system, and/or it is not linked to another information system, please skip to Question 1.12.

- 1.10 If the system uses information, including information about individuals (PII), from other information systems, what information will be used?

Information system name(s):

- Individual's name  
 Other names, *i.e.*, maiden name, *etc.*  
 SSN:  
 Race/Ethnicity  
 Gender  
 U.S. Citizenship  
 Non-U.S. Citizenship  
 Biometric data  
 Finger prints  
 Voice prints  
 Retina scan/prints  
 Photographs  
 Other physical information, *i.e.*, hair color, eye color, identifying marks, *etc.*  
 Birth date/Age  
 Place of birth  
 Medical data  
 Marital status  
 Spousal information  
 Miscellaneous family information  
 Home address  
 Home address history  
 Home telephone number(s)  
 Personal cell phone number(s)  
 Personal e-mail address(es)  
 Personal fax number(s)  
 Emergency contact data  
 Credit card number(s)  
 Driver's license number(s)  
 Bank account(s)  
 Non-FCC personal employment records  
 Non-FCC government badge or employee ID number(s), *e.g.*, contractor's badge number.  
 Law enforcement data

- Background investigation history
- Military history
- National security data
- Foreign countries visited
- Other information:

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

- Not applicable
- Name of business contact/firm representative, customer, or others
- Business/corporate purpose(s)
- Other business/employment/job description(s)
- Professional/Personal clubs and/or affiliations
- Full or partial SSN:
- Intra-business office address (office or workstation)
- Business/office address
- Business telephone number(s)
- Business cell phone number(s)
- Business fax number(s)
- Business pager number(s)
- Business e-mail address(es)
- Race/Ethnicity
- Customers’ gender(s)
- 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)
- Credit report(s)
- Other information:

**Miscellaneous Business Information:**

- Not applicable
- Not publicly available business data, i.e., trade or propriety information
- Other information:

**“Non-personal” information:**

- Not applicable
- Economic data
- Engineering/scientific data
- Accounting/financial data
- Legal/regulatory/policy data
- Other information:

1.11 What are the sources for the information from the other information system(s) that you are collecting:

- Personal information from FCC employees:
- Personal information from FCC contractors:
- Personal information from non-FCC individuals and/or households:
- Non-personal information from businesses and other for-profit entities:
- Non-personal information from institutions and other non-profit entities:
- Non-personal information from farms:
- Non-personal information from Federal Government agencies:
- Non-personal information from state, local, or tribal governments:
- Other sources:

1.12 Will the information system derive new information or create previously unavailable information through aggregation or consolidation from the information that will now be collected, including (where applicable) information that is being shared or transferred from another information system?

- Yes
- No

Please explain your response:

The Commission's purposes in conducting the "Broadband Dead Zone Report and Consumer Broadband Test" are to use the records in this system that are collected from the "Broadband Dead Zone Report and the Test to determine the access of US residents to broadband--cable and, DSL, fiber, mobile wireless, and other broadband services, and to gather data on the quality of the broadband services being provided

The "Consumer Broadband Test" permits users to measure the quality of their fixed or mobile Internet broadband connection.

The data may be used to inform implementation of the National Broadband Plan, the National Broadband Map, and other proceedings related to the provisioning of broadband services.

In doing the above, the Commission may aggregate the address level data to less specific geographies (census block, zip code, county, *etc.*). The Commission may also use the data collected in combination with other non-PII broadband availability and performance [data] to create other useful data sets for analysis.

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:

Individuals who participate in the Broadband Dead Zone Report and/or the Consumer Broadband Test must provide their home address. In addition, the Consumer Broadband Test will collect each participant's Internet Protocol (IP) address.

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

- Yes  
 No

Please explain your response:

The new PII collected will not be associated with other PII or be used to make a determination of any kind about any individuals.

As noted above, individuals who participate in the Broadband Dead Zone Report and Consumer Broadband Test must provide their home address--street address, city, state, and zip code. In addition, the Consumer Broadband Test will collect the individual participant's IP address.

In addition, users (participants) may submit business addresses and/or access the Consumer Broadband Test from a place of business [or an institution, *i.e.*, schools,] *etc.* In doing so, these users (participants) must provide their current address to participate in the broadband survey and broadband quality test. Additionally, the Consumer Broadband Test also collects the Internet Protocol (IP) address of each user (individual computer) who selects to participate.

This information system's purposes, and the data that it will gather, are to be used for the Broadband Dead Zone Report and Consumer Broadband Test. The information may be used to inform implementation of the National Broadband Plan, the National Broadband Map, and other proceedings related to the provisioning of broadband services. This information system has no other purposes.

If the information system contains information about individuals, please answer Question 1.15; but if the information system does not contain information about individuals, please skip to Question 1.16.

- 1.15 What is the potential impact or "security risk" 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:

As noted above, individuals who participate in the "Broadband Dead Zone Report" and "Consumer Broadband Test" must provide their home address, and their IP address is also collected for the "Consumer Broadband Test." This information system is only used for Broadband Dead Zone Report and the Consumer Broadband Test--it has no other purposes. Since only the information system is only storing the individual's home address and IP address, the Commission believes that this limited amount of personally identifiable information (PII) will pose only minimal potential impacts (or "security risks") for individual participants should there be an unauthorized disclosure or security breach.

1.16. What is the potential impact or “security risk” for the information that is maintained in the information system if an unauthorized disclosure or misuse of information occurs?  
(check one)

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

Please explain your response:

1.17 Is this impact level consistent with the guidelines as determined by the FIPS 199 assessment?

- Yes
- No

Please explain your response:

The Broadband Dead Zone Report and Consumer Broadband Test information system is a "non major" information system, and as such, it is exempt from the FIPS assessment guidelines.

1.18 When was “Certification and Accreditation” (C&A) last completed?

The Broadband Dead Zone Report and Consumer Broadband Test information system is covered under the General Support Systems (GSS) C&A.

1.19 Has the Chief Information Officer (CIO) and/or the Chief Security Officer designated this information system as requiring an

- Independent risk assessment
- Independent security test and evaluation
- Other risk assessment and/or security testing procedure, *etc.*
- Not applicable.

Please explain your response: The Broadband Dead Zone Report and Consumer Broadband Test information system is a "non major" information system, and as such, these designations have been deemed unnecessary.

1.20 Based on the information that you have provided thus far, if:

- The information you are collecting does not includes information about individuals if you answered **NO** to questions 1.5, 1.7, 1.8, 1.9, 1.10, 1.11, 1.13, 1.14 and/or 1.16, then:

The information system (IT application or paper files) does not contain information about individuals nor does it have shared links with other information systems that may also contain information about individuals that could constitute a privacy issue.

A Privacy Impact Assessment is **not required**.

- The information you are collecting does include information about individuals, and you answered **YES** to questions 1.5, 1.7, 1.8, 1.9, 1.10, 1.11, 1.13, 1.14, and /or 1.15, then:

The information system (IT application or paper files) does contain information about individuals, or it does have shared links with other information systems that may also contain information about individuals that could constitute a privacy issue.

The information system **requires** a Privacy Impact Assessment (PIA).