Federal Communications Commission

Office of the Managing Director

Privacy Threshold Analysis (PTA)[1]
Study Area Boundary (SAB) Data Collection Website
April 26, 2013

FCC Bureau/Office: Wireline Competition Bureau (WCB)
Division(s): Industry Analysis and Technology

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

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[1] This form is used to determine whether this information system requires a Privacy Impact Assessment.

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 recourses 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 Analysis** to be conducted.

Section 1.0 Information System's Status:

1.1   Status of the Information System/Database:

    ☒ New information system—Implementation date: April 2013
    ☐ Revised or upgraded information system—Revision or upgrade date:
    ☐ Other changes, revisions, etc. and date:

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

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

    Please explain your response:

    In November 2011, the FCC adopted rules in the *Universal Service Fund/Intercarrier Compensation Transformation Order* (USF/ICTO), FCC 11-116.[2] The Wireline Competition Bureau (WCB) released two subsequent orders establishing the rules for the SAB data collection, DA 12-1777[3] and DA 13-282.[4] To implement certain reforms contained in the USF/ICTO and the two subsequent orders, WCB created the Study Area Boundary (SAB) data collection website, which is a website portal that allows States and Incumbent Local Exchange Carriers (ILECs) to log-in, enter contact information, upload contour shapefiles, and certify their

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[2] The Universal Service Fund/Intercarrier Compensation Transformation Order, FCC 11-116 is available at: http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-11-161A1.pdf.
[3] DA 12-1777 is available at: http://www.fcc.gov/document/fcc-collect-study-area-boundaries;
[4] DA 13-282 is available at: http://www.fcc.gov/document/high-cost-universal-support.

submissions. The uploaded shapefiles are displayed as a map so that the user can see the contours of the area that carry their information. Both state entities and ILECs can use the site to certify to the accuracy of their submissions.

If this is a new information system or database, 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 or database 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/database being changed or upgraded, and if so, what are the purposes for system's changes, and/or will any changes now include information about individuals, *i.e.*, personally identifiable information (PII):

☐ Yes
☐ No

Please explain your response:

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

As noted in Question 1.1, WCB created the SAB database to implement certain reforms contained in the USF/ICTO and the two subsequent orders. The SAB database will enable the FCC to create a map that displays the service area contours to determine how well the State and the ILEC contour data correspond.

1.7   What information is the information system/database 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
☐ Race/ethnicity
☐ Gender
☐ 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
☐ 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
- ☐ Race/ethnicity
- ☐ Gender
- ☐ US Citizenship
- ☐ Non-US Citizenship
- ☐ Biometric data
    - ☐ Fingerprints
    - ☐ Voice prints
    - ☐ Retina scan/prints
    - ☐ Photographs
    - ☐ Other physical information, *e.g.* 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, *e.g*, maiden name, *etc*.
- ☐ FCC badge number (employee ID)
- ☐ SSN:
- ☐ Citizenship
- ☐ Non-U.S. Citizenship:
- ☐ Race/Ethnicity
- ☐ Gender
- ☐ Biometric data

- ☐ Fingerprints
- ☐ Voiceprints
- ☐ Retina scans/prints
- ☐ Photographs
- ☐ Other physical information, *e.g.*, 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 Business Customers (usually not considered "personal information"):

- ☐ Not applicable
- ☒ Name(s) of business contact(s)/firm representative(s), customer and/or others: States and ILECs
- ☐ Race/Ethnicity
- ☐ Gender
- ☐ Citizenship
- ☐ Non-U.S. Citizenship:
- ☐ 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: The SAB database contains contact information for the individual from the State and ILEC who will be primarily responsible for submitting their respective contour mapping data.

"Non-personal" information obtained from FCC sources:

☒ Not applicable
☐ Economic data
☐ Engineering/scientific data
☐ Accounting/financial data
☐ Legal/regulatory/policy data
☐ Other information, please specify:

Miscellaneous Business, Technology, or Other Information:

☐ Not applicable
☒ Not publicly available business or technology data, *e.g.*, trade or propriety information: The SAB data are used to create a map that displays the contour data from each participating State and ILEC, which allows the State and the ILEC to see how well the contours of the area that the ILEC serves match (or "validate") the state's contours.
☐ Other information, please specify:

1.8   What are the sources for the information, including PII, 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: ILEC contact information and contour data to make their service areas.
☐ 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: State contact information and the state's service area contours.
☐ Other sources, please specify:

1.9   Does this information system have any links to other information systems or databases?

An information system (or database) may be considered as linked to other information systems (or databases) if it has one or more of the following characteristics:

☐ The information system is a subsystem or other component of another information system or database that is operated by another FCC bureau/office or non-FCC entity (like the FBI, DOJ, National Finance Center, etc.);

☐ The information system transfers or receives information, including PII, between itself and another FCC or non-FCC information system or database;

☒ The information system has other types of links or ties to other FCC or non-FCC information systems or databases;

☐ The information system has other characteristics that make it linked or connected to another FCC or non-FCC information system or database;

☒ The information system has no links to another information system (or database), *i.e.*, it does not share, transfer, and/or obtain data from another system.

If this system has any of these criteria or characteristics, please explain; otherwise please skip to Question 1.11:

States and ILECs will register in CORES to enable them to participate in the SAB database for which they will provide their contact information, upload their contour shape files, and certify their submissions, etc., which provide the data to map the ILEC service area(s) within each particular State. Aside from the CORES registration the SAB database has no other links nor does it exchange data with other FCC or non-FCC information systems/databases.

1.10   What information system(s)/database(s) have links to this system/database that allow information to be shared or transferred between these systems/databases?

☒ FCC information system and information system name(s): CORES (register with the FCC to participate in the SAB database.

☒ Non-FCC information system and information system name(s): SAB database

If this information system is a "stand alone" information system, and it does not use or share information with another system/database (other than CORES registration), please skip to Question 1.13.

1.11   If the information system/database uses information, including PII, from other information systems/databases, what information is used or shared?

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 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
- [ ] 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, please specify:

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, please specify:

Miscellaneous Business Information:

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

"Non-personal" information:

☐ Not applicable
☐ Economic data
☐ Engineering/scientific data
☐ Accounting/financial data
☐ Legal/regulatory/policy data
☐ Other information, please specify:

1.12   What are the sources for the information from the other system(s)/database(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:

1.13   Does this system/database have the capability to manipulate, transform, or create new information from the information it collects through data analysis, aggregation, or consolidation from the information that is being collected, including (where applicable) information that is being shared or transferred from another information system?

☐ Yes
☒ No

Please explain your response:

The SAB website is used for States and ILECs to input their contour shapefile data to create the contour map, which displays the contours of the ILEC service area(s) within that particular State. The map displays the data for the States and the ILECs to validate and certify the accuracy of their submissions. The SAB database does not perform any data analyses.

If the information system does <u>not</u> contain information about individuals (PII), please skip to Question 1.17.

1.14   Can the PII in this information system or linked to other information systems/databases 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:

1.15   Will the new information include PII that is to be included in an individual's records or to be used to make a determination about an individual?

☐ Yes
☐ No

Please explain your response:

1.16   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:

1.17   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) [maybe I confused you, but 1.15 and 1.16 were supposed to be an "either/or" response—if the information system has PII, complete 1.15, if non, complete 1.16]

☒ 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:

As noted in Question 1.1 and 1.3, the SAB database is the information collection mechanism for creating the contour shapefile map that validates the data that States and ILECs input to determine whether their service areas (carrying their information) correspond.

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

☒ Yes
☐ No

Please explain your response:

The impact level for the SAB database is consistent with the FIPS 199 assessment, *i.e.*, "low impacts."

1.19   When was "Assessment and Accreditation" (A&A) last completed?

The A&A was done in April 2013.

1.20   Has the Chief Information Officer (CIO) and/or the Chief Information Security Officer (CISO) 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 security test and evaluation were done in April 2013.

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

☒ The information you are collecting does not include PII if you answered **NO** to questions 1.4, 1.5, 1.7, 1.8, 1.11, 1.12, and/or 1.17, then:

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

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

☐ The information you are collecting does include PII, and you answered **YES** to questions 1.4, 1.5, 1.7, 1.8, 1.11, 1.12, 1.14, and/or 1.15, then:

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

This information system/database **requires** a Privacy Impact Assessment (PIA).