UNITED STATES

FEDERAL COMMUNICATIONS COMMISSION

PRIVACY IMPACT ASSESSMENT FOR THE COMMISSION REGISTRATION SYSTEM (CORES)

March 2022

OFFICE OF GENERAL COUNSEL

WASHINGTON, DC 20554

Next Review Cycle: March 2023

Record of Approval

Document Approval		
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SAOP Approval		
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Record of Approval

Date	Description	Name
12/13/2021	Validation of information – System Owner	Dr. Hua Lu
01/07/2022	Validation of completeness – IT Compliance Lead	Liem Nguyen

Revision History

Date	Description	Name
10/09/2021	Original Document Created	ISSO/Privacy
12/14/2021	Initial IPA Documentation	ISSO – Al. Shipman
12/18/2021	System Owner review and updates	Dr. Hua Lu

Commission Registration System (CORES)

1.1. Introduction

Section 208 of the E-Government Act of 2002[1] requires agencies to conduct a **Privacy Impact Assessment (PIA)** whenever they procure or develop an information technology system that will collect, maintain, or disseminate information about individual people. The PIA must document how the system will use information it collects about individuals and, unless it contains classified or sensitive information, it must be made available to the public. The PIA was intended to be a tool for agencies to protect personal information throughout a technology system's life cycle. The Office of Management and Budget (OMB) has commented: "*In general, PIAs are required to be performed and updated as necessary where a system change creates new privacy risks.*"[2]

The FCC is subject to the requirements of the E-Government Act and is committed to identifying and addressing privacy risks whenever it develops or makes changes to its information systems. The questions below explore important privacy issues identified in the Act and in later guidance by the Office of Management and Budget (OMB) and the National Institute of Standards and Technology (NIST). A longer discussion of the FCC's PIA policies can be found in Chapter 9 of the FCC's Privacy Act Manual (FCC Inst. 1113.1).

System owners, in collaboration with the Information System Security Officers (ISSOs) should complete the **Initial Privacy Assessment (IPA)** prior to filling out the PIA. The FCC Senior Agency Official for Privacy (SAOP) uses the IPA to determine whether a system will collect the kind of information that would make it subject to the requirements of Section 208, including a PIA. A PIA should not be completed until an IPA is completed and the SAOP makes a determination.

If you have any questions, please contact the Privacy Team at privacy@fcc.gov.

[1] 44 U.S.C. § 3501 note.

[2] OMB Memorandum No. M-03-22 (Sep. 26, 2003), https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2003/m03_22.pdf.

1.2. Authority To Operate (ATO) Boundary Overview

For each IT system that resides within the ATO Boundary, please use the table below to provide the system name, a brief description of the what the system does, whether it contains Personally Identifiable Information (PII) and a brief description of the PII (if applicable), the applicable System of Records Notice, the legal authorities to collect and maintain the PII, and whether the PII is shared with other systems (internal or external).

Please copy the table as necessary to complete the information for each system within the boundary.

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM Commission Registration System (CORES)
NAME OF BUREAU Office of the Managing Director (OMD)
DOES THE SYSTEM CONTAIN PII? Yes.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) Name, contact information, financial information, and various identification numbers. An entity must first register a FCC Registration Number (FRN) using the FCC's CORES system before conducting business with the FCC. The FRN is used to identify an entity within all FCC Licensing/Filing systems and follows the entity throughout the licensing process. In addition, it is recognized by other computer and database systems within the FCC. The FRN contains contact name, address, phone, email, and may contain Employer Identification Number, Tax ID Number, or Social Security Number depending on the type of FRN.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)? FCC/OMD-25 Financial Operations Information System, 81 Fed. Reg. 69522
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? The Communications Act of 1934, as amended, 47 U.S.C.; 44 U.S.C. §§ 3101, 3102, 3309; Section 7701 of the Debt Collection Improvement Act of 1996, 31 U.S.C. § 7701(c)(1); Federal Financial Management Improvement Act of 1996; Financial Officers Act of 1990; the Federal Managers Financial Integrity Act of 1982; Executive Order 9397.
Does the system leverage the FCC's Accounting for Disclosure control (Access to the Information)? Yes. The Privacy Team keeps an accurate accounting of disclosures of information.
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?

Yes.

All the CORES systems have the same data sources and share access to the PII. Additionally, when an FCC system authenticates a user via FRN, PII is passed and can be parsed by the calling system (i.e., when CORES or another FCC systems calls the FO API service to authenticate FRN/password for authentication, the return not only validates whether the combination is correct, but also sends relevant FRN registration information, PII included). PII is also shared with GENESIS and contained within documents stored in Alfresco. Under certain circumstances, PII also may be shared with partner agencies.

INFORMATION ABOUT THE SYSTEM

NAME OF THE SYSTEM

Financial Office Application Programming Interface (FO API)

NAME OF BUREAU

Office of the Managing Director (OMD)

DOES THE SYSTEM CONTAIN PII?

Yes

PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)

Name, account information, and IP address. An entity must first register an FRN using the FCC's CORES system before conducting business with the FCC. The FRN is used to identify an entity within all FCC Licensing/Filing systems and follows the entity throughout the licensing process. In addition, it is recognized by other computer and database systems within the FCC. The FRN contains contact name, address, phone, email, and may contain Employer Identification Number, Tax ID Number, or Social Security Number depending on the type of FRN. The FO API system has services which create, update, and retrieve the PII data contained within FRNs.

IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?

FCC/OMD-25 Financial Operations Information System, 81 Fed. Reg. 69522

WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?

The Communications Act of 1934, as amended, 47 U.S.C.; 44 U.S.C. §§ 3101, 3102, 3309; Section 7701 of the Debt Collection Improvement Act of 1996, 31 U.S.C. § 7701(c)(1); Federal Financial Management Improvement Act of 1996; Financial Officers Act of 1990; the Federal Managers Financial Integrity Act of 1982; Executive Order 9397.

Does the system leverage the FCC's Accounting for Disclosure control (Access to the Information)?

Yes. The Privacy Team keeps an accurate accounting of disclosures of information
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? Yes.

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM Financial Office Application Programming Interface – Cloud
NAME OF BUREAU Office of the Managing Director (OMD)
DOES THE SYSTEM CONTAIN PII? Yes.
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) Name, contact information, financial information, and various identification numbers. An entity must first register an FRN using the FCC's CORES system before conducting business with the FCC. The FRN is used to identify an entity within all FCC Licensing/Filing systems and follows the entity throughout the licensing process. In addition, it is recognized by other computer and database systems within the FCC. The FRN contains contact name, address, phone, email, and may contain Employer Identification Number, Tax ID Number, or Social Security Number depending on the type of FRN. The FO API CL system has services which create, update, and retrieve the PII data contained within FRNs.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)? FCC/OMD-25 Financial Operations Information System, 81 Fed. Reg. 69522
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? The Communications Act of 1934, as amended, 47 U.S.C.; 44 U.S.C. §§ 3101, 3102, 3309; Section 7701 of the Debt Collection Improvement Act of 1996, 31 U.S.C. § 7701(c)(1); Federal Financial Management Improvement Act of 1996; Financial Officers Act of 1990; the Federal Managers Financial Integrity Act of 1982; Executive Order 9397.
Does the system leverage the FCC's Accounting for Disclosure control (Access to the Information)? Yes. The Privacy Team keeps an accurate accounting of disclosures of information
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? Yes

INFORMATION ABOUT THE SYSTEM
NAME OF THE SYSTEM Financial Office Admin (FO Admin)
NAME OF BUREAU Office of the Managing Director (OMD)
DOES THE SYSTEM CONTAIN PII? Yes
PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE) Name, account information, IP address, SSN, email address, TAX identification number and banking information. An entity must first register an FRN using the FCC's CORES system before conducting business with the FCC. The FRN is used to identify an entity within all FCC Licensing/Filing systems and follows the entity throughout the licensing process. In addition, it is recognized by other computer and database systems within the FCC. FO Admin is used by FCC staff to manage FRN, Username, remittance, regulatory, and other FCC processes. The Financial Operations staff also use the FO Admin application to intake and process Incentive Auctions Reimbursement forms 1876 and 1877. The system and its security environment are described in detail in the SSP that is included with this documentation.
IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)? FCC/OMD-25 Financial Operations Information System, 81 Fed. Reg. 69522
WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII? The Communications Act of 1934, as amended, 47 U.S.C.; 44 U.S.C. §§ 3101, 3102, 3309; Section 7701 of the Debt Collection Improvement Act of 1996, 31 U.S.C. § 7701(c)(1); Federal Financial Management Improvement Act of 1996; Financial Officers Act of 1990; the Federal Managers Financial Integrity Act of 1982; Executive Order 9397.
Does the system leverage the FCC's Accounting for Disclosure control (Access to the Information)? Yes. The Privacy Team keeps an accurate accounting of disclosures of information
DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS? Yes

A. Is this a new ATO Boundary or an existing ATO Boundary?

☐ New Boundary

☒ Existing Boundary

B. If the ATO Boundary is/will consist of cloud-based computing system(s),[3] please check the box that best describes the service the FCC receives/will receive from the cloud computing provider:

☐ The FCC uses provider-supported applications on the provider's cloud network (Software as a Service or SaaS).

☐ The FCC has deployed application/s on the provider's cloud network and the provider supports the applications (Platform as a Service or PaaS) [list applicable system(s)]

☒ The FCC has deployed its own application/s on the cloud network and controls how these application/s are configured and operate (Infrastructure as a Service or IaaS) [list applicable system(s)]

CORES resides on the FCC's network hosted at Allegany Ballistics Laboratory (ABL) but uses Amazon Web Services (AWS) cloud-based infrastructure for Username or FRN authentication. The cloud hosted FO API services are used optionally by FCC systems, and equal services are available on premise.

C. **If the IT systems in the ATO Boundary are in the cloud, are they FedRAMP certified?**

☐ Yes, all the IT systems are FedRAMP certified
☒ No, none, or only some, of the IT systems are FedRAMP certified

**Note:* AWS, which is utilized for CORES Username and FRN authentication and for FO APICL services, is the only cloud-based system that is part of the boundary, and is FedRAMP certified.

1.3. Collection of Data

A. Please explain why it is necessary to collect PII to carry out the purpose of each of the system(s) that maintain PII within this Boundary.

Information in CORES is collected, used, disseminated, and maintained for the FCC to perform its regulatory, licensing, enforcement, policy, financial management, and other activities. Personal information is necessary to authenticate registrants in the course of issuing, renewing, reviewing licenses, accepting payments, authorizing service, and enforcing regulations or statutes.

[3] *See* NIST, *The NIST Definition of Cloud Computing*, Special Pub. No. 800-145 (Sep. 2011), https://csrc.nist.gov/publications/detail/sp/800-145/final.

B. For each system within this Boundary, will this PII be collected from individuals themselves, or from third parties? If collected from individuals themselves, link to the Privacy Act Statement[4] for each system that is included with the online or paper form the system(s) use(s) to collect the PII.

CORES collects and stores business and individual information, including PII, of registrants through a registration page on the CORES website. The Privacy Act statement will appear at the point of collection.

C. What steps is the FCC taking to limit the collection of PII to only that which is necessary?

CORES collects PII based on FCC rules for obtaining an FRN. To limit the collection of PII, both the paper Form 160 and Electronic Form 160 for FRN registration require only those fields that are set forth in the FCC rules. Any other input fields for FRN registration are optional for the registrant. Further, CORES allows users to select exemptions in place of entering a Social Security Number (SSN) or Tax Identification Number (TIN) upon registering or updating their FRNs. An SSN or TIN may later need to be added if required by another FCC system to complete a transaction for the FRN owner, but not required by CORES itself.

D. What steps will the FCC take to make sure this PII is accurate, complete, and up to date?

It is the responsibility of the parties providing the data to ensure the completeness, accuracy, and currency of data at the time it is provided. PII stored in CORES is accessible to users via their online accounts, and they can make updates as necessary. Information that is used by the FCC as part of its regulatory, enforcement, and other activities will be reviewed for accuracy and timeliness as required by the particular activity and the laws and authorities, if any, applicable at the time the agency compiles the records (e.g., Communications Act, administrative or court evidentiary rules and procedures).

[4] A Privacy Act Statement must inform individuals about (1) the authority to solicit information, (2) the principal purpose(s) for collecting the information, (3) the routine uses for disclosing the information, and (4) whether providing the information is mandatory or voluntary.

1.4. Use of the Data

A. Please explain the data flow, including whether the PII will be ingested from, or shared with, another system. Are internal connections reflected in the Cyber Security Asset Management tool (CSAM)? Are Information Sharing Agreements (ISAs) in CSAM for external connections?

CORES ingests data, including PII, directly from users. CORES also interfaces directly with other FCC systems as a means of authenticating users with FRNs. In the course of authentication, an individual's or entity's contact and FRN information is shared with these Application Programming Interfaces (API)s. Other FCC systems using CORES as a means of authenticating users must be vetted for privacy and security purposes and must have an authority to operate at the FCC.

All internal connections are reflected within the CORES SSP. The aforementioned documents are stored in CSAM.

CORES, FO Admin, FO API, and FO APICL connect to GENESIS, which is a product of CGI Federal (CGI). The GENESIS system is comprised of Momentum, a commercial off-the-shelf (COTS) software solution that is built and maintained by the CGI. The product is certified by the Financial Systems Integration Office (FSIO) and provides financial management capabilities specifically designed for the government and configured to meet FCC business needs. Further, the FO API and FO APICL services may be used by partner agencies if an agreement is reached between agencies. FO Admin also uses "Alfresco" for some file upload/download services. Alfresco is a COTS Enterprise Content Management (ECM) system. Alfresco includes a collaboration environment - Alfresco Share - and an out-of-the-box web portal framework for managing and using content. Alfresco is in use by FCC's Office of the Inspector General (OIG); it is classified as a Minor Application (aka Child System) within FCC's instance of Amazon Web Services (AWS).

B. Will the information be shared with third parties as part of the operations of the information system (e.g., through an application programming interface or "API")?

No. Authorized FCC contractors have access to information in CORES, when necessary. For example, some authorized FCC contractors have access to certain administrative functions in CORES to ensure the system is functioning properly and to respond to public user inquiries (for example, inquiries regarding password resets, or login issues). All FCC contractors are required to complete security and privacy training prior to obtaining access to any FCC systems, and complete annual security and privacy training

to maintain network access and access to those systems. Contractors who access CORES are subject to the same rules and policies as FCC staff. Contractors must also follow the reporting and other procedures in the FCC's Breach Notification Policy.

C. **How long will the PII be retained and how will it be disposed of?**

CORES has a specific records schedule: N1-173-00-1 (03/01/2000).
Records may be retained (1) only until the output/reports are verified; (2) 3 months for paper and electronic forms (FCC Forms 160 series); (3) permanent retention for the Master Data Files and system and file specifications with instructions:

- Paper Forms (temporary records) – Destroy three (3) months after data are entered into the system and verified.
- Electronic Forms (temporary records) – Destroy three (3) months after data are entered into the system and verified.
- Master Data File (permanent records) – Download a copy of the data annually at the end of the calendar year. Transfer immediately to the National Archives.
- Output/Reports – Textual records needed for verification purposes.
  - Temporary records – Destroy when report(s) are verified.
- Documentation – Includes system specifications and file specifications with corresponding instructions.
  - Permanent records – Transfer annually to the National Archives with the Master Data File.

1.5. Data Security and Privacy

A. What are the system's ratings for confidentiality, integrity, and availability?

Confidentiality	**__High**	**_X_Moderate**	**___Low**
Integrity	**__High**	**_X_Moderate**	**___Low**
Availability	**__High**	**_X_Moderate**	**_ _Low**

Boundary rating is "Moderate". Refer to boundary's FIPS 199 dated February 2022 for their ratings.

B. Discuss the physical, administrative, and technical controls in place to protect the data in the system.

The FCC protects its information resources with a dynamic set of security measures. Some of these measures (e.g., network firewalls, physical security) protect the entire FCC enterprise, while other measures (e.g., user access restrictions, encryption) are applied to specific information systems. Following the risk-based policy established in the Federal Information Modernization Act (FISMA), the FCC applies more security measures (also known as security "controls") to information systems that present higher operational risks. Consistent with this policy, the FCC applies specific security controls to systems that collect and process PII. A comprehensive list of the security and privacy controls the FCC may apply to its information systems can be found in National Institute of Standards and Technology (NIST) Special Publication No. 800-53, Revision 5 [NIST]. Finally, resides on the FCC's network hosted at ABL but uses Amazon Web Services (AWS) cloud-based infrastructure for authentication, which infrastructure is FedRAMP accredited.

C. Does the system inherit privacy controls from an external provider? If an Interconnection Security Agreement (ISA), Memorandum of Understanding (MOU), or similar document is in place, please summarize the privacy applicable portions of the document.

No.

1.6. Access to the Information

A. Which FCC employees and contractors will have access to the PII in this information system?

FCC staff and contractors in the Office of Managing Director (OMD), Financial Operations, and Information Technology centers. Under appropriate circumstances, data within CORES or CORES log data may be provided to other Bureaus and Offices or law enforcement agencies for auditing or law enforcement purposes.

B. Does this system leverage Enterprise Access Controls?

Yes. The identification of authorized users of the CORES system and the specification of access privileges is consistent with the requirements in associated security controls that are depicted within the CORES SSP. Any users requiring administrative privileges on the

CORES system accounts must be approved and then received additional scrutiny by the System Owner and FCC official responsible for approving access to the CORES system, accounts and obtain temporary privileged access through the FCC's Enterprise Access Controls.

C. Does the system leverage the FCC's Accounting for Disclosure control?

Yes. CORES system administrators and/or System Owner keeps an accurate accounting of disclosures of information that is held in each CORES system of records under its control. Which includes but is not limited to:
1) Date, nature and purpose of each disclosure of a record; and
2) Name and address of the person or agency to which the disclosure was made.

CORES retains the accounting of disclosures for the life of the record or five years after the disclosure is made, whichever is longer.