



UNITED STATES  
**FEDERAL COMMUNICATIONS COMMISSION**

**PRIVACY IMPACT ASSESSMENT (PIA) FOR  
INTEGRATED SPECTRUM AUCTION SYSTEM  
FOR THE OFFICE OF ECONOMICS AND ANALYTICS  
BOUNDARY**


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Annual Review Date

**OFFICE OF GENERAL COUNSEL**

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### Record of Approval

Document Approval	
<b>Drafter Name:</b> Shannon Kendall, ISSO	<b>Bureau/Office:</b> Office of Managing Director (OMD) Office: Information Resiliency (IR)
SAOP Approval	
<b>Printed Name:</b> Elliot S. Tarloff	<b>Senior Agency Official for Privacy</b>
	
<b>Signature &amp; Date</b>	

### Record of Approval

Date	Description	Author
12/14/2022	Validation of information – System Owner	Ramya Ganesh
1/31/2023	Validation of completeness – IT Compliance Lead	Liem Nguyen

### Revision History

Date	Description	Name
8/10/2021	Original Document Created	ISSO – O. Iyiola
12/13/2022	Annual Review	ISSO – Shannon Kendall
12/22/2022	Revisions to Sections 1.2, 1.2B, 1.3A-D, 1.4A-C, 1.5A, 1.6A	Senior Agency Official for Privacy (SAOP) – Elliot Tarloff
01/05/2023	Edits to Section 1.6 B	ISSO – Shannon Kendall

## Integrated Spectrum Auction System Boundary (ISAS)

### 1.1. Introduction

Section 208 of the E-Government Act of 2002<sup>1</sup> 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."*<sup>2</sup>

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](mailto:privacy@fcc.gov).

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<sup>1</sup> 44 U.S.C. § 3501 note.

<sup>2</sup> OMB Memorandum No. M-03-22 (Sep. 26, 2003), <https://www.whitehouse.gov/wp-content/uploads/2017/11/203-M-03-22-OMB-Guidance-for-Implementing-the-Privacy-Provisions-of-the-E-Government-Act-of-2002-1.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).

<b>INFORMATION ABOUT THE SYSTEM</b>
<p><b>NAME OF THE SYSTEM</b> Integrated Spectrum Auction System (ISAS)</p>
<p><b>NAME OF BUREAU</b> Office Economics and Analytics (OEA)</p>
<p><b>DOES THE SYSTEM CONTAIN PII?</b> Yes. ISAS collects PII information from applicants that wish to participate in FCC auctions. PII is not retrieved in ISAS by name or unique identifier.</p>
<p><b>PLEASE PROVIDE A BRIEF DESCRIPTION OF THE PII (IF APPLICABLE)</b> Full name, Phone Numbers, Work Phone Number, Race, Sex, Email address, Work E-mail address and mailing address, Financial data, User ID, Corporate titles and Positions</p>
<p><b>IN WHAT SYSTEM OF RECORDS (SORN) IS THE INFORMATION CONTAINED (IF APPLICABLE)?</b> N/A. ISAS does not allow retrieval of records by unique identifier and therefore is not a "System of Records" as defined by the Privacy Act, 5 U.S.C. 552a(a)(5). The collection of business contact and certification information is governed by FCC-2, 87 F.R. 52,554. A prior iteration of ISAS was subject to FCC/WTB-7, 86 F.R. 14428</p>
<p><b>WHAT ARE THE LEGAL AUTHORITIES FOR THE COLLECTION OF THIS PII?</b> 47 U.S.C. 151, 154, 208, 258, 301, 303, 309(e), and 312</p>
<p><b>DOES THE COMMISSION KEEP AN ACCURATE ACCOUNTING OF DISCLOSURES FROM THE SYSTEM AS REQUIRED BY SUBSECTION (c) OF THE PRIVACY ACT?</b> N/A. ISAS is not a "System of records" as defined by the Privacy Act, 5 U.S.C. 552a(a)(5).</p>
<p><b>DOES THIS SYSTEM SHARE THE PII WITH OTHER SYSTEMS?</b> Yes. PII is shared with the Auctions Bidding System (ABS), Flexible Auctions Bidding System (FABS), Universal Licensing System 1.0 (ULS), CORES, and Genesis.</p>

**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),<sup>3</sup> please check the box that best describes the service the FCC receives/will receive from the cloud computing provider:**

- The FCC uses provider-supported application/s on the provider's cloud network (Software as a Service or SaaS) [list applicable system(s)]
- 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)]

ISAS is not hosted in the Cloud. ISAS is configured for high availability and utilizes multiple data centers.

**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
- Not applicable, ATO boundary is not Cloud based.

### 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.**

ISAS is used to collect the information from applicants (i.e., businesses and/or institutions) that wish to participate in FCC auctions. PII is used as part of FCC staff's review of applications to participate in FCC auctions, and it enables the Auction Bidding System (ABS) and the Flexible Auction Bidding System (FABS) to authorize bidding entities with up to 3 user accounts ("Authorized Bidding Individuals") to bid in FCC auctions.

**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**

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<sup>3</sup> 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>.

**Privacy Act Statement<sup>4</sup> for each system that is included with the online or paper form the system(s) use(s) to collect the PII.**

PII is collected from the applicants themselves (i.e., corporations and other business entities, institutions, and/or individuals acting in a proprietary capacity) that wish to participate in FCC auctions. ISAS is not a “System of Records” as defined by the Privacy Act, so no Privacy Act Statement is required, but the FCC’s Privacy Policy is linked from the external-facing ISAS webpage.

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

PII is collected by ISAS only as part of the bidder qualification process, which includes identity and financial verification. ISAS has a rigorous application review process and requests only the PII elements necessary for the FCC to perform qualification review.

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

All applicants pass through a rigorous identity and financial verification process. Through this process, PII is verified for accuracy and completeness.

## 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?**

Information is ingested into ISAS directly from applicants. ISAS sends data, including PII data, in a flat file(s) to the Auctions Bidding System (ABS) and the Flexible Auctions Bidding System (FABS).

Ownership information is also ingested from and shared with the Universal Licensing System 1.0 (ULS). ISAS retrieves Ownership data from ULS to prefill the Auction Application Ownership pages. ISAS also retrieves spectrum license inventory and defaulted license information for an auction. At the conclusion of an auction, ISAS transfers auction data to ULS.

The Commission Registration System (CORES) provides a mechanism for companies/people to register with the FCC and to obtain an FRN (FCC Registration Number). This FRN is required to log into the ISAS application system. Also, ISAS replicates (in real time) data from CORES to tables within its Auctions Extract database. The ISAS single sign-on module uses this Extract

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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.

database to validate the FRN and password supplied by users logging into the system. Additionally, the Auctions Extract database is used to validate all FRNs entered in the Agreements and Ownership sections of the application and to validate an Account Holder FRN entered on the Wire Transfers for Refund page.

Applicant address and FRN are also shared with Genesis.

All internal connections are reflected within the Cyber Security Asset Management tool (CSAM).

**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”)?**

Yes, some of the PII data elements, such as applicant name, FRN, address and phone number, are published and made available through the ISAS Public Application Search. There is no other sharing of information with parties external to the FCC.

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

Information in the systems within this boundary is retained and destroyed in accordance with applicable FCC policies and procedures, as well as with the FCC records disposition schedule or General Records Schedules approved by the National Archives and Records Administration (NARA). PII will be retained and disposed of in accordance with FCC policy and the NARA General Records Schedule 6.4 (GRS 6.4), which indicates to destroy records over 3 years old, but authorizes longer retention if required for business use.

**1.5 Data Security and Privacy**

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

Confidentiality	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Low
Integrity	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Low
Availability	<input type="checkbox"/> High	<input checked="" type="checkbox"/> Moderate	<input type="checkbox"/> Low

**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 [\[NIST\]](#).

- 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.**

Integrated Spectrum Auction System (ISAS) does not inherit privacy controls from an external provider.

## 1.6 Access to the Information

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

FCC employees and contractors, including developers, with access to the database will have access to the PII it maintains. To obtain access to the database, employees and contractors are required to sign a document acknowledging the disclosure / need-to-know procedures by which information is restricted to only certain staff. The need-to-know list is maintained by Auctions Division staff.

- B. Does this system leverage Enterprise Access Controls?**

Yes. ISAS applies NIST 800-53 Rev.5, FCC Enterprise Access Controls; adhering to policies set forth by the FCC.