

Privacy Impact Assessment Filing Online and Dockets Records

- 1. Agency: Postal Regulatory Commission**
- 2. Name of Information Technology (IT) System: Filing Online**

Filing Online, the Commission's internet-based docketing system that allows registered users and the general public to file documents and state their views regarding matters before the Commission. These documents are posted on the Commission's website upon acceptance by the Commission.

- 3. Privacy Act System of Records Notice Identifier, (if applicable):**

PRC-2, Docket Room Records

- 4. Authority to collect information:**

39 U.S.C. 503, Commission Rules of Practice 3001.42(b).

- 5. Brief summary or overview of the IT system: Dockets Database:**

Filing Online allows registered users and participants in matters pending before the Commission to file their documents electronically via the internet with the Commission. Once accepted by the Commission, each document is posted on the Commission's website and thus available for public viewing. When an individual establishes a Filing Online account and becomes a registered user, the individual's contact information may be added to the Commission's "service list" for that docket. If an account is dormant for more than six-months, its information is removed from the database.

Filing Online also allows users to establish a temporary account online, if they wish to file comments with the Commission or do not plan to file often with the Commission. These accounts expire in 10 days and no records are maintained.

- 6. Identifiable Information to be Collected and Nature / Source:**

The Commission requires an original signature on a hardcopy application for an "Account Holder" or an "Agent" of the Account Holder to be authorized to file electronic documents with the Commission.

The paper-based application requires the name, company, address, telephone, fax, email address and signature. Neither the application nor its information is entered in any electronic format. The original application is maintained in hardcopy in the Commission's Dockets section in a secured cabinet.

7. Method of information collection:

The Commission requires an original signature on a hardcopy application for an "Account Holder" or an "Agent" of the Account Holder to be authorized to file electronic documents with the Commission. Account Holders are initially assigned user names and passwords by the Commission, but may change their passwords once they sign in to their accounts.

Filing Online will provide a temporary account to allow an individual to file a document while the application for a non-temporary account is pending or to allow a member of the general public to file comments with the Commission without becoming a formal account holder. This information is entered electronically through the Commission's Filing Online application web page. The information collected online is: name, job title, organization, address, city, state, ZIP Code, telephone, fax and email address. Like the Account Holder, the temporary user is also allowed to select his/her own user name and password as part of the application for Temporary Access. Temporary accounts expire after 10 days.

Additionally, this System of Records also includes paper-based correspondence from the general public regarding matters before the Commission. While this correspondence includes names, addresses and sometimes telephone and email addresses, it remains paper-based and is filed in the Dockets section with the Commission. This information is not used for any other purpose by the Commission other than as a record of the individual views of the writer regarding a matter before the Commission. As records in an administrative procedure, they are public documents and can be viewed in person, in their native format, by making a request to the Commission.

8. Purpose of the collection:

The Commission Rules of Practice and Procedure require the contact information of all participants in a matter to be publicly available. Those users electing to intervene, file documents online, or appear as a witness in a matter before the Commission may have their name, address, telephone number, fax number, and email address made available in a document on the appropriate docket posted on the Commission's website. The Commission also provides participant contact information in a mail merge format so that participants may create address labels for hardcopy service of documents. This is done to provide notification and a method of access to all parties who are participants in a matter, and for ex parte considerations.

9. Data uses:

PII data are collected from Filing Online Account Holders and maintained by the Commission to provide a method for:

- *Notification to all participants of who will be participating in this matter with them before the Commission and how to contact them;*
- *Contacting all participants via hardcopy service should the Commission's Filing Online system become disabled.*

The following Privacy Act notice is included on the Commission's website Privacy Policy and on the Filing Online Account application page:

Privacy Act Notice: The collection of this information is authorized by 39 U.S.C. § 503. This Information will be used for administering the filing of documents in electronic form by participants in Postal Regulatory Commission proceedings. It may be publicly disclosed under the routine uses given in the Privacy Act system notice published at 64 Fed. Reg. 56819 (1999).

10. New data about individuals derived or created through aggregation:

No, other than including participants on a service or contact list, using the contact information provided, for a specific matter before the Commission. There is no other aggregation of this information.

11. Internal and external sharing:

Authorized Filing Online users and participants, in a matter before the Commission, are advised that the information collected is made public to all internal and external users. This information is clearly delineated in the Commission's Rules of Practice and Procedure. The Commission and participants, including the Commission, must be able to contact and provide hardcopy service should the Commission's Filing Online system fail to process documents.

12. Opportunities to object to the collection or to consent to the specific uses and how consent is granted:

There is no opportunity to object to collection of this information. Those who wish to file documents, other than simple comments, on a matter pending before the Commission must file documents, verifying their identify, intervene, and become an Account Holder for the purposes of filings.

All personal data collected are voluntarily given by the subject individual. Forms that collect personal data to be maintained in this IT system contain a Privacy Act notice, as required by 5 U.S.C. 552a(e)(3), allowing the individual to make an informed decision about providing the data. The statement advises the individual that the information provided is voluntary, and provides the consequences of choosing not to participate with the information collection.

13. Information provided by the individual at Collection, the Format, and the Means of delivery:

A Privacy Act system of records notice is provided to Account Holder applicants.

Privacy Act Notice: The collection of this information is authorized by 39 U.S.C. § 503. This Information will be used for administering the filing of documents in electronic form by participants in Postal Regulatory Commission proceedings. It may be publicly disclosed under the routine uses given in the Privacy Act system notice published at 64 Fed. Reg. 56819 (1999).

14. Data Controls and Security:

Administrative: Access to the information in paper-based formats: applications for Account Holder status are limited to those individuals (staff and contractors) whose job duties require they have access to the Dockets database. Contract personnel are required to complete a "Nondisclosure Agreement" before gaining access.

Physical: Paper-based information is stored in files within the Dockets section. Account Holder applications are secured within a locked room within the Dockets area, the key to which is further secured with the Dockets Supervisor.

Technical: Account Holder passwords expire after six months unless renewed.

General Network Security: In the past year the Commission has taken strategic steps to improve the Commission Information Technology program to ensure that it is robust enough to serve the Commission under the Postal Accountability and Enhancement Act of 2006.

Security is a major component of the Commission IT infrastructure. In 2008, the Commission retained a security consultant to perform an audit of security controls, recommend remediation steps, and assist Commission staff in closing the gaps by June of 2008. One product resulting from the study was a Plan of Action and Milestones (POAM) to guide Commission staff through the implementation of recommended security controls.

The Commission has formalized a Security Policy and a working System Security Plan that are closely aligned with NIST 800-53 guidelines and OMB mandates. Commission IT staff has installed state of the art network monitoring and intrusion detection systems. For example, the Sawmill suite of products enables monitoring of essential server logs and real-time notification. To comply with the Federal Desktop Core Configuration mandate, staff installed a centralized desktop management system called C5. A product called System Center Essentials keeps workstations and servers patched and secure. Commission employees have SSL encrypted Web access to the Commission Exchange server for more secure email. Staff installed an upgraded version of anti-virus software on both workstations and network servers. The Commission instituted secure, SSL encrypted Virtual Private

Network (VPN) access to enable its Telework program. Finally, on April 7, 2008 the Commission deployed a new public website. The site was built from the ground up utilizing a multi-tiered architecture to provide a much greater level of security than the former website. The website utilizes SSL encryption through Entrust Certificates to provide a secure channel for filing online.

In summary, the Commission's IT security posture has significantly improved in 2008. The Commission IT infrastructure has grown, is more secure, more robust, and serves the Commission well. Policies and procedures are in place. The IT staff has increased in number and capability through strategic outsourcing. The staff monitors security controls on a continuous basis and keeps abreast of new technology. The Commission affirms it is following OMB and NIST standards for IT security.

15. Privacy Act Interface:

The Commission's Privacy Act rules can be found at 39 CFR Part 3003 and Privacy Act notices are available on its website at:

<http://www.prc.gov/prc-pages/misc/privacy/default.aspx>

16. Describe/evaluate any potential privacy risks regarding the collection, use, and sharing of the information in identifiable form. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals. Describe/evaluate further any risks posed by the adopted security measures:

There is a potential risk that individuals filing public documents with the Commission, included in a Commission service list, or a list of intervenors in a proceeding, may be contacted by direct or electronic mail for commercial or "spam" like purposes.

17. Contact Point:

For information on the Filing Online system please contact Steven W. Williams, Secretary of the Commission, at prc-admin@prc.gov or 202-789-6840.

18. Classification and Publication of Privacy Impact Assessment:

Classification: Unclassified.

Publication: This document will be published either in full or in summary form on the website page used by the Commission to establish the identity of users of the Filing Online system and is located at:

<http://www.prc.gov/prc-pages/misc/privacy/default.aspx>.

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