

**U.S. Department of Commerce
U.S. Patent and Trademark Office**



**Privacy Threshold Analysis
for the
Private Branch Exchange – Voice Over Internet Protocol
(PBX-VOIP)**

U.S. Department of Commerce Privacy Threshold Analysis

USPTO Private Branch Exchange – Voice over Internet Protocol (PBX-VOIP)

Unique Project Identifier: PTOI-021-00

Introduction: This Privacy Threshold Analysis (PTA) is a questionnaire to assist with determining if a Privacy Impact Assessment (PIA) is necessary for this IT system. This PTA is primarily based from the Office of Management and Budget (OMB) privacy guidance and the Department of Commerce (DOC) IT security/privacy policy. If questions arise or further guidance is needed in order to complete this PTA, please contact your Bureau Chief Privacy Officer (BCPO).

Description of the information system and its purpose: *Provide a general description (in a way that a non-technical person can understand) of the information system that addresses the following elements:*

The E-Government Act of 2002 defines “information system” by reference to the definition section of Title 44 of the United States Code. The following is a summary of the definition: “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).

The Private Branch Exchange – Voice over Internet Protocol (PBX-VOIP) is an infrastructure information system consisting of three sub-systems, Cisco VoIP, Enterprise Call Center (ECC), and Cellular Repeater System (CRS). PBX-VOIP provides the following services in support of analog voice, digital voice, collaborative services and data communications for business units across the entire USPTO:

- Converged and non-converged analog and digital voice communication services;
- Customer Contact Center voice and terminal support;
- Teleworker collaborative computing environment; and
- Enhanced cellular device (phones) service throughout the USPTO campus.

a) *Whether it is a general support system, major application, or other type of system*
PBX-VOIP is a General Support System (GSS)

b) *System location*
600 Dulany Street, Alexandria, VA 22314

c) *Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)*

PBX-VOIP interconnects with the following systems:

- **Enterprise Desktop Platform (EDP):** EDP is an infrastructure information system, which provides a standard enterprise-wide environment that manages desktops and laptops running on the Windows 10 operating system (OS), providing United States Government Configuration Baseline (USGCB) compliant workstations. The USGCB

security mandate by the Office of Management and Budget (OMB) requires all Federal Agencies, including the United States Patent and Trademark Office (USPTO), to use the directed desktop configuration.

- **Enterprise Windows Services (EWS):** EWS is an infrastructure information system, which provides a hosting platform for major applications that support various USPTO missions.
- **Network and Security Infrastructure System (NSI):** NSI is an infrastructure information system, and provides an aggregate of subsystems that facilitates the communications, secure access, protective services, and network infrastructure support for all United States Patent and Trademark Office (USPTO) IT applications.
- **Enterprise UNIX Services (EUS):** EUS System consists of assorted UNIX operating system variants (OS), each of which is comprised of many utilities, along with the master control program, the kernel.
- **Trademark Processing System – External Systems (TPS-ES):** TPS-ES is a Major Application information system, and provides customer support for processing Trademark applications for USPTO.
- **Information Dissemination Support System (IDSS):** IDSS is an application information system, and provides services or functions in support of the USPTO mission. The purpose of the IDSS system is to support the Trademark and Electronic Government Business Division, the Corporate Systems Division (CSD), the Patent Search System Division, the Office of Electronic Information Products, and the Office of Public Information Services. It provides automated support for the timely search and retrieval of electronic text and images concerning patent applications and patents by USPTO internal and external users.
- **Security and Compliance Services (SCS):** SCS provides a centralized command and control console with integrated enterprise log management, security information and event management, network behavior analysis, and reporting through the collection of events, network/application flow data, vulnerability data, and identity information.
- **Database Services (DBS):** DBS is an infrastructure information system, which provides a Database Infrastructure to support the mission of USPTO database needs.
- **Enterprise Software System (ESS):** ESS is an infrastructure information system and provides a variety of services to support the USPTO mission.

d) *The purpose that the system is designed to serve*

PBX-VOIP is an infrastructure information system, consisting of three sub-systems: Cisco-VoIP, Enterprise Contact Center (ECC), and Cellular Repeater System (CRS) that provides the following services in support of analog voice, digital voice, collaborative services, and data communications for business units across the entire USPTO:

- Converged and non-converged analog and digital voice communication services;
- Customer Contact Center voice and terminal support;
- Teleworker collaborative computing environment; and
- Enhanced cellular device (phones) service throughout the USPTO campus.

e) The way the system operates to achieve the purpose

PBX-VOIP operates through the following Automated Information Systems (AISs) to achieve its purpose:

- **Cisco Voice over Internet Protocol (Cisco- VoIP):** Provides telephony services to the USPTO Headquarters and Nation-wide Satellite Offices.
- **Enterprise Contact Center (ECC):** Provides technology that allows the public and USPTO employees the ability to contact USPTO business centers and access interactive and automated information regarding USPTO products, processes, and services. Additionally, ECC features an automated failover capability for system redundancy.
- **Cellular Repeater System (CRS):** Cellular Repeater System (CRS) provides in-building cellular frequency coverage so that corporate and personal cellular devices can effectively communicate to enhance the cellular phone usage experience while on the USPTO campus.

f) A general description of the type of information collected, maintained, used, or disseminated by the system

PBX-VOIP system collects Call Detail Records, voicemail messages, Call Center Statistics, alarms and events.

g) Identify individuals who have access to information on the system

USPTO employees and contractors like maintenance personnel and/or Call Center supervisors have access to the information on the system for administrative purposes.

h) How information in the system is retrieved by the user

Information in the system is retrieved through webpage access. Secure Shell (SSH) - used for secure logins, file transfers (scp, SFTP) and port forwarding. This port is needed for logging into the call managers and for nightly backups for the Cisco- VoIP Cluster. (Call Manager Signaling) Credentials are validated via Active Directory.

i) How information is transmitted to and from the system

Cisco- VoIP employs cryptographic protections to prevent unauthorized disclosure of information and detect changes during transmission through the implementation of TLS 1.0 for URLs with FIPS 140-2 compliant protocols. In addition, Cisco- VoIP implements HTTPS (TLS/SSL) for the WEB administration and the remote command line utilizes SSH.

Questionnaire:

1. Status of the Information System

1a. What is the status of this information system?

- This is a new information system. *Continue to answer questions and complete certification.*
- This is an existing information system with changes that create new privacy risks. *Complete chart below, continue to answer questions, and complete certification.*

| Changes That Create New Privacy Risks (CTCNPR) | | | | | |
|---|--------------------------|------------------------|--------------------------|------------------------------------|--------------------------|
| a. Conversions | <input type="checkbox"/> | d. Significant Merging | <input type="checkbox"/> | g. New Interagency Uses | <input type="checkbox"/> |
| b. Anonymous to Non-Anonymous | <input type="checkbox"/> | e. New Public Access | <input type="checkbox"/> | h. Internal Flow or Collection | <input type="checkbox"/> |
| c. Significant System Management Changes | <input type="checkbox"/> | f. Commercial Sources | <input type="checkbox"/> | i. Alteration in Character of Data | <input type="checkbox"/> |
| j. Other changes that create new privacy risks (specify): | | | | | |

- This is an existing information system in which changes do not create new privacy risks, and there is not a SAOP approved Privacy Impact Assessment. *Continue to answer questions and complete certification.*
- This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2015 or 01-2017). *Continue to answer questions and complete certification.*
- This is an existing information system in which changes do not create new privacy risks, and there is a SAOP approved Privacy Impact Assessment (version 01-2019 or later). *Skip questions and complete certification.*

1b. Has an IT Compliance in Acquisitions Checklist been completed with the appropriate signatures?

- Yes. This is a new information system.
- Yes. This is an existing information system for which an amended contract is needed.
- No. The IT Compliance in Acquisitions Checklist is not required for the acquisition of equipment for specialized Research and Development or scientific purposes that are not a National Security System.
- No. This is not a new information system.

2. Is the IT system or its information used to support any activity, which may raise privacy concerns?

NIST Special Publication 800-53 Revision 4, Appendix J, states “Organizations may also engage in activities that do not involve the collection and use of PII, but may nevertheless raise privacy concerns and associated risk. The privacy controls are equally applicable to those activities and can be used to analyze the privacy risk and mitigate such risk when necessary.” Examples include, but are not limited to, audio recordings, video surveillance, building entry readers, and electronic purchase transactions.

Yes. (Check all that apply.)

| Activities | | | |
|--|-------------------------------------|----------------------------------|--------------------------|
| Audio recordings | <input checked="" type="checkbox"/> | Building entry readers | <input type="checkbox"/> |
| Video surveillance | <input type="checkbox"/> | Electronic purchase transactions | <input type="checkbox"/> |
| Other(specify): Call detail records, Caller ID information (including first and last name), Voicemail messages | | | |

No.

3. Does the IT system collect, maintain, or disseminate business identifiable information (BII)?

As per DOC Privacy Policy: “For the purpose of this policy, business identifiable information consists of(a) information that is defined in the Freedom of Information Act (FOIA) as "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." (5 U.S.C.552(b)(4)). This information is exempt from automatic release under the (b)(4) FOIA exemption. "Commercial" is not confined to records that reveal basic commercial operations" but includes any records [or information] in which the submitter has a commercial interest" and can include information submitted by a nonprofit entity, or (b) commercial or other information that, although it may not be exempt from release under FOIA, is exempt from disclosure by law (e.g., 13 U.S.C.).”

Yes, the IT system collects, maintains, or disseminates BII.

No, this IT system does not collect any BII.

4. Personally Identifiable Information (PII)

4a. Does the IT system collect, maintain, or disseminate PII?

As per OMB 17-12: “The term PII refers to information that can be used to distinguish or trace an individual’s identity either alone or when combined with other information that is linked or linkable to a specific individual.”

Yes, the IT system collects, maintains, or disseminates PII about: (Check all that apply.)

- DOC employees
- Contractors working on behalf of DOC
- Other Federal Government personnel
- Members of the public

No, this IT system does not collect any PII.

If the answer is “yes” to question 4a, please respond to the following questions.

4b. Does the IT system collect, maintain, or disseminate Social Security numbers (SSNs), including truncated form?

Yes, the IT system collects, maintains, or disseminates SSNs, including truncated form.

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| Provide an explanation for the business need requiring the collection of SSNs, including truncated form. |
| Provide the legal authority which permits the collection of SSNs, including truncated form. |

No, the IT system does not collect, maintain, or disseminate SSNs, including truncated form.

4c. Does the IT system collect, maintain, or disseminate PII other than user ID?

Yes, the IT system collects, maintains, or disseminates PII other than user ID.

No, the user ID is the only PII collected, maintained, or disseminated by the IT system.

4d. Will the purpose for which the PII is collected, stored, used, processed, disclosed, or disseminated (context of use) cause the assignment of a higher PII confidentiality impact level?

Examples of context of use include, but are not limited to, law enforcement investigations, administration of benefits, contagious disease treatments, etc.

Yes, the context of use will cause the assignment of a higher PII confidentiality impact level.

No, the context of use will not cause the assignment of a higher PII confidentiality impact level.

If any of the answers to questions 2, 3, 4b, 4c, and/or 4d are “Yes,” a Privacy Impact Assessment (PIA) must be completed for the IT system. This PTA and the SAOP approved PIA must be a part of the IT system’s Assessment and Authorization Package.

CERTIFICATION

I certify the criteria implied by one or more of the questions above **apply** to the Private Branch Exchange – Voice over Internet Protocol (PBX-VOIP) system and as a consequence of this applicability, I will perform and document a PIA for this IT system.

I certify the criteria implied by the questions above **do not apply** to the Private Branch Exchange – Voice over Internet Protocol (PBX-VOIP) system and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

| | |
|--|--|
| <p>System Owner Name: Ian Neil Office: Infrastructure Services Division (ISD) Phone: (571) 272-5075 Email: Ian.Neil@uspto.gov</p> <p style="text-align: right;">Digitally signed by Ian Neil Date: 2021.09.10 08:23:23 -04'00'</p> <p>Signature: <u>Ian Neil</u></p> <p>Date signed: _____</p> | <p>Chief Information Security Officer Name: Don Watson Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-8130 Email: Don.Watson@uspto.gov</p> <p style="text-align: right;">Digitally signed by DON R Watson Date: 2021.09.13 10:46:57 -04'00'</p> <p>Signature: <u>DON R Watson</u></p> <p>Date signed: _____</p> |
| <p>Privacy Act Officer Name: John Heaton Office: Office of General Law (O/GL) Phone: (571) 270-7420 Email: Ricou.Heaton@uspto.gov</p> <p style="text-align: right;">Digitally signed by Users, Heaton, John (Ricou) Date: 2021.09.09 07:15:10 -04'00'</p> <p>Signature: <u>Users, Heaton, John (Ricou)</u></p> <p>Date signed: _____</p> | <p>Bureau Chief Privacy Officer and Authorizing Official Name: Henry J. Holcombe Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-9400 Email: Jamie.Holcombe@uspto.gov</p> <p style="text-align: right;">Digitally signed by Users, Holcombe, Henry Date: 2021.09.14 16:47:23 -04'00'</p> <p>Signature: <u>Users, Holcombe, Henry</u></p> <p>Date signed: _____</p> |
| <p>Co-Authorizing Official Name: N/A Office: N/A Phone: N/A Email: N/A</p> <p>Signature: _____</p> <p>Date signed: _____</p> | |