



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

**Publication Bulk Order
Privacy Impact Assessment**

February 27, 2006

Introduction

The Federal Trade Commission's (FTC) Division of Consumer and Business Education (DCBE) produces print materials that offer practical advice about buying a wide variety of products and services and explain how various federal regulations help protect consumers' rights against sellers who engage in misleading or fraudulent advertising, marketing, and/or credit practices. The FTC provides these materials - free of charge - to consumers who request copies.

The FTC distributes approximately 6 million publications each year to a variety of customers. These include libraries, credit counseling services, police departments, Congressional offices, community-based organizations, trade associations, corporations, and federal, state, and local government offices and other institutions - to name a few examples.

The Publication Bulk Order system will provide an online resource for customers to effectively and efficiently order FTC publications. The web-based order system will allow customers to select publications from a catalog, add them to their "shopping cart," and "check out" by providing their shipping information. The web based order system will be hosted by the FTC's contractor or subcontractor. Order fulfillment will be handled by the FCIC Publication Distribution Center in Pueblo, CO. This facility will pull, pack, and ship the publications to the customer.

System Overview

The Publication Bulk Order web-based system is a custom designed website that will collect, store, and manage customer order and shipping information in a secure database. The information gathered from customers will be used to process their order and may be used to contact the customer should any issues arise with processing and/or shipping their order for publications. The FTC conducted a privacy impact assessment to determine whether the Publication Bulk Order website and ordering system presented any privacy issues.

Analysis

1. The Information That Will Be Collected (Nature and Source)

The web-based order system will maintain information relating to customers that are interested in receiving educational publications and additional information from the FTC. The information maintained may include the customer's name, mailing address, telephone number, business affiliation, and titles and quantities of publications ordered. The information is collected voluntarily, directly from the customer.

For customers that "opt-in" to receive additional information from the FTC, the system will also collect an email address from the customer.

2. Why The Information Is Being Collected (Purpose)

The FTC collects contact information to help fulfill customer requests for publications. Additionally, customers who voluntarily “opt-in” for additional information may sent occasional updates about consumer and business information.

The consumer and business education program constitutes a significant component of the consumer protection mission. Education and outreach are key tools to prevent consumer injury from unfair or deceptive practices in the marketplace and to educate businesses in how to comply with the law. Through the FTC’s publications, online activities, efforts with other agencies and organizations, marketing initiatives, and media outreach, the agency reaches tens of millions of consumers and business people each year.

3. The Opportunities Individuals Will Have To Decline To Provide Information Or To Consent To Particular Uses Of The Information And How Individuals Grant Consent

Customer orders for FTC publications cannot be processed without proper and accurate personal information required for shipping the materials. Individuals may decline to provide customer information if they are not interested in receiving publications from the FTC. FTC publications are publicly available on the FTC website, www.ftc.gov, so individuals may search for and obtain the information through the site.

Customers who are receiving FTC information and no longer wish to continue receiving it may contact the FTC and request to be removed from mailing lists. Email communications sent to customers who “opt-in” to receive additional information will include instructions on how they can be removed from FTC mailing lists.

4. Intended Uses Of The Information Collected

Name, organization, mailing address, phone number, and email address will be used to send customers their orders, and contact them in the event of delivery or fulfillment problems. Additionally, it will be used to send communications to individuals, organizations, and agencies that have “opted-in” to receive current information about the agency’s activities. Any information about the organization, industry, or topics of interest will be used to identify individuals and organizations likely to be interested in a particular FTC news release, alert, or other communication. Information about customer preferences and prior communications will be used to determine how and whether to send communications to a particular customer.

5. With Whom The Information Will Be Shared (Disclosures)

Information in the Publication Bulk Order system will be collected by the secure website, hosted by the FTC’s contractor or subcontractor. The order data is sent to the FCIC fulfillment center in Pueblo. Customer information may be shared in accordance with routine uses permitted

by the Privacy Act, including in response to Freedom of Information Act requests from private individuals or companies, requests from Congress, or in litigation.

6. Security (Administrative and Technological Controls, Including Maintenance and Disposal)

Personal information collected by the Publication Bulk Order system will be safeguarded in several ways. The customer's personal information will be input on a secure web page and stored on a secure server. The information is compiled weekly, encrypted using PGP protocols, and sent via secure FTP to the Pueblo fulfillment center. The information on the collecting server is stored for not more than one year on a first-in, first-out (FIFO) basis.

Data sent to the Pueblo fulfillment center is decrypted strictly for purposes of processing customer orders. It is stored on a secure system for one year and deleted on a FIFO basis.

Information from customers who "opt-in" for additional information will be stored on FTC computers, and are retained until an individual requests deletion or distribution of information to the individual is no longer anticipated.

Applicable IT security requirements and procedures required by federal law and policy will be followed to ensure that information is appropriately secured. An appropriate risk assessment has been conducted to identify appropriate security controls to protect against risks, and those controls are implemented. Monitoring, testing, and evaluation occurs on a regular basis to ensure that controls continue to work properly and that information is safeguarded. The FTC's Chief Information Security Officer shall be the point of contact for any security questions relating to this project.

7. Privacy Act

The customer information maintained in the Publication Bulk Order system is covered by an existing Privacy Act System of Records Notice, available at 57 FR 45678 (Oct. 2, 1992) (FTC VI-I, Mailing Lists).

8. Other Privacy Considerations And Analysis

To protect individuals' privacy, the FTC made the following decisions in configuring the Publication Bulk Order system. We limit access to the information to those individuals who have a business purpose for seeing the data. Second, we ensured that safeguards were in place to protect the information from internal misuse or external threats, such as hacking. Lastly, we required that all outgoing email communications include instructions on how consumers can stop receiving communications from the FTC.

The FTC has determined that the contractor's proposed online ordering system, including the security protocols that will be used, were deemed sufficient to protect any electronic privacy interests, since the sensitivity of the information being collected is relatively low, i.e., contact information mostly from organizations, not individuals, without any financial or other personal

information or transaction involved. FTC would ensure that this same or greater security controls were in effect with any successor contractor.

Additionally, FTC's contractor or subcontractor has instituted safeguards for this information, including physical security of data resources, limited employee access to the data, data encryption, and secure data archive storage.

The website is not intended to collect information from children age 13 or under within the meaning of the Children's Online Privacy Protection Act (COPPA).

The website does not use persistent cookies or tracking mechanisms that collect personally identifying information. The website uses non-persistent session cookies to anonymously collect a visitor's IP address and the date and time of the visit and to keep track of items in the "shopping cart" until checkout. These session cookies are temporary files that are erased when the user closes all browsers. We use these session cookies for site management purposes. Accepting session cookies on this website is required in order to accurately process an order for publications.

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