



**Federal Trade Commission  
Privacy Impact Assessment**

## **Video Hosting**

**January 2013**

## **SECTION 1.0 PURPOSE**

### **1.1 – What is the specific purpose of the FTC’s use of this third-party video hosting, and how does that fit with the agency’s broader mission?**

The Federal Trade Commission (FTC or Commission) uses a third-party video hosting service to publish, share and archive educational videos, and to broadcast events live to the public. Through the Brightcove Video Cloud and KnowledgeVision products (referred to herein individually as Brightcove and KnowledgeVision or collectively as FTC’s video hosting service), consumers have the ability to watch FTC videos and live events on a variety of devices including PCs, smartphones, tablets, and connected TVs.

Visitors to the Commission’s website can locate FTC videos from multiple access points including the homepage, news page, and more specifically, the video library available at [www.ftc.gov/videos](http://www.ftc.gov/videos). Similarly, this information (where applicable) is available in Spanish at [www.ftc.gov/espanol](http://www.ftc.gov/espanol). Video play lists may also be created by FTC staff for other FTC websites including, but not limited to, OnGuardOnline.gov and Business.ftc.gov.

These videos allow the Commission to promote FTC information and resources through short and timely educational videos for consumers and businesses. Additionally, the FTC can broadcast live press events and workshops to the public.

The Brightcove video platform enables citizens to watch and share FTC content via emailed links and social networking websites. Users may opt to download these videos and/or grab code to share videos on other websites. These services are free and open to the public.

The Brightcove video platform partners with the following services to provide comprehensive FTC video services to the public:

- Knowledge Vision: Service partner used to create dual screen presentations and streaming live webcasts.
- 3PlayMedia: Service partner used to generate closed captions.
- DotSub: Service partner used to generate Spanish language captions.
- WGBH: Television service partner used to generate live captions for live events.
- Akamai: Content delivery network provider, all video is hosted on their servers

### **1.2 – Is the FTC’s use of third-party video hosting consistent with all applicable laws, regulations, and policies?**

Yes. The President’s January 21, 2009 memorandum on *Transparency and Open Government* and the OMB Director’s December 8, 2009 *Open Government Directive* call on federal departments and agencies to harness new technologies to engage with the public. In particular, live webcasts make FTC events more accessible and affordable by permitting public participation without the time and expense associated with travel and in-person attendance. Additionally, this service allows the Commission to make events available to consumers on a variety of devices, without regard to a consumer’s location, and thus maximize the Commission’s outreach efforts.

Per The Rehabilitation Act of 1973, Section 508 requirements, Closed-Captions or Transcripts are available with all FTC videos and live webcasts.

While the Brightcove platform is hosted on the cloud, all FTC videos are created and published by FTC staff, and the FTC [privacy policy](#) applies to all FTC video content unless otherwise noted. FTC staff regularly reviews the platform to ensure that any changes and/or updates continue to meet and/or exceed the FTC privacy policy and this privacy impact assessment.

Prior to watching live webcasts, users will be shown an exit script notifying them that KnowledgeVision's privacy policy, not the FTC's, will apply to live webcasts. Furthermore, users who navigate from the webcast page to social media sites will also be shown an exit script identifying the applicable privacy policy. In both instances, users can decline to proceed to the new site.

## **SECTION 2.0 – ANY PERSONALLY IDENTIFIABLE INFORMATION (PII) AVAILABLE TO THE FTC THROUGH VIDEO SYSTEM**

### **2.1 – What information, including PII, is made available to the FTC?**

While the FTC's video hosting system does not collect PII, it does use cookies for general analytics and video quality. This includes a persistent cookie used to identify new users or returning visitors. The cookie only functions on the FTC website and can't be tracked or used by other websites. Cookies are used to provide video quality, viewer analytics, and bandwidth information. Data that is collected includes user ID, number of video tabs currently open, time browser was last closed, video streams playing in open tab, video start times, and other data about video playtimes. When customers leave the FTC website, the cookie does not track any customer internet usage on other websites/domains.

Additionally, the Brightcove platform contains features (e.g., buttons, icons, pop-up screens) that enable consumers to "share" (notify others about) the FTC's videos through other social networking sites (e.g., Facebook). Consumers must ordinarily provide their email addresses or social networking logins as part of this social sharing process. That personal information, however, is collected by the social networking site that the consumer is using to share the FTC's video, and is not made available to or collected or maintained by the FTC or Brightcove. Furthermore, as part of this sharing process, consumers are notified that they are accessing a third-party social networking site that is not covered by the FTC's privacy policy, and that they have the option of continuing to that site, or cancelling the video sharing transaction so that their PII will not be collected by the third-party site.

### **2.2 – What are the sources of the information?**

The FTC's video solution does not collect PII; however, it does use both session and persistent cookies to collect information for analytic and site quality purposes.

The following information applies to the FTC’s Akamai Analytic Cookies, which collects information about the quality of Video Cloud video delivery.

Cookie Name	Function	Persistence
AkamaiAnalytics_BrowserSessionID	Stores user ID for visit	Current Session
Akamai_AnalyticsMetrics_clientid	Stores a unique user ID	Persistent for one year
AkamaiAnalyticsD0_visitMetricsCsv	Stores visit-related metrics as a CSV	Current Session
AkamaiAnalyticsD0_bitRateBucketsCsv	Stores required information to compute bitrate data for the visit	Current Session
AkamaiAnalytics_VisitCookie	Stores information about the number of tabs currently open	Current Session
AkamaiAnalytics_VisitLastCloseTime	Stores the time when the browser was last closed	Current Session
AkamaiAnalytics_VisitIsPlaying	Stores information about streams playing in any tabs	Current Session
clientLastPTimes	Stores the epoch times of the Play beacon	Current Session
clientLastHTimes	Stores the epoch times of the Heartbeat beacon	Current Session
AkamaiAnalyticsD0_visitStartTime	Stores visit start time	Current Session

Akamai uses two beacons to assist it with determining how long the user has been viewing the video.

Beacon Name	Function	Persistence
Play beacon	Sends plug-in information to the Akamai servers	Current Session
Heartbeat beacon	Sends plug-in information to the Akamai servers	Current Session

The Video Cloud player uses a Tubemogul Analytics Cookie to identify unique and new viewers of FTC videos by assigning a unique identifying number.

Cookie Name	Function	Persistence
_tmid	Identifies unique viewers and new viewers	Persistent for one year

Video Cloud Flash players use a Brightcove Analytics Cookie to detect the initial bandwidth of a viewer’s computer or device.

Cookie Name	Function	Persistence
BC_BANDWIDTH	Detects initial bandwidth capability for progressive download deliveries	Current Session

For live webcasts, the KnowledgeVision Player uses a cookie to identify unique and new viewers of FTC events by assigning a unique identifying number.

Cookie Name	Function	Persistence
kvViewerId	Identifies unique viewers and new viewers	Persistent for one year

More information about the cookies used by the FTC’s video hosts, [Brightcove](#) and [KnowledgeVision](#), are available online.

Additionally, Brightcove does offer an option to link a Google Analytics account to the Commission’s Brightcove platform for additional analytics, however, the FTC does not employ this feature.

**2.2 – Do the FTC’s activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?**

Per the OMB memorandum, *Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act*, the FTC’s use of Brightcove products is not a web-based interactive technology that would trigger the PRA.

Events that are webcast live may solicit comments and feedback through other FTC channels previously approved by OMB.

**SECTION 3.0 THE FTC’S INTENDED OR EXPECTED USE OF INFORMATION, INCLUDING PII**

**3.1 – Generally, how will the agency use the information described in Section 2.0?**

Consumers visiting FTC websites will receive cookies that collect consumer data when watching FTC videos or live webcasts.

Cookie information is available to FTC staff, support teams in Brightcove, Akamai, Tubemogul and KnowledgeVision. The data is not shared with any third parties. The data is available and stored with the vendor(s) only as long as the FTC is a customer.

See Section 2.0 for cookie details.

### **3.2 – Provide specific examples of the types of uses to which the information may be subject**

See Section 2.0 for cookie details.

Per the OMB memorandum M-10-22, *Guidance for Online Use of Web Measurement and Customization Technologies*, the Commission may use web analytics to measure if the Commission’s videos are engaging the public, are an appropriate length for our audiences, if videos our increasing our reach, etc. See Section 2.2 for more information.

## **SECTION 4.0 SHARING OR DISCLOSING OF INFORMATION, INCLUDING PII**

### **4.1 – With what entities or persons inside or outside the agency will the information be shared, and for what purposes will the PII be disclosed?**

Only approved FTC staff members from the Office of the Chief Information Officer (OCIO), the Office of Public Affairs (OPA), and the Division of Consumer and Business Education (DCBE) have access to manage videos and run analytic reports. See Section 2.0 for information about the Commission’s use of analytics.

As needed, FTC account administrators may provide Brightcove and KnowledgeVision staff access to the Commission’s video account to support production issues. This access will be limited to the time and staff necessary, and will be promptly be revoked once the issue is resolved.

### **4.2 – What safeguards are in place to prevent expansion of use beyond those authorized under law and described in this PIA?**

Only approved staff members from OCIO, OPA, and DCBE have access to manage the FTC’s Brightcove and KnowledgeVision products including managing video content and running analytical reports. Each member with access to the FTC’s video platform must sign and comply with the Commission’s internal Rules of Behavior for account management.

In the event that FTC staff needs to provide Brightcove or KnowledgeVision personnel with access to our video account for support issues, access will only be granted for the time needed, and will be immediately revoked once the issue is resolved.

## **SECTION 5.0 - MAINTENANCE AND RETENTION OF INFORMATION, INCLUDING PII**

### **5.1 – How will the FTC maintain the information, and for how long?**

The FTC will have access to the analytic data for as long as it is a customer of Brightcove and KnowledgeVision products.

### **5.2 – Was the retention period established to minimize privacy risk?**

Yes. The data will only be retained as long as the FTC is under contract with the vendor.

## **SECTION 6.0 – HOW THE AGENCY WILL SECURE INFORMATION, INCLUDING PII**

### **6.1 – Will the FTC’s privacy and security officials coordinate to develop methods of securing information?**

The FTC follows all applicable Federal Information Security Management Act (FISMA) requirements to ensure that the Video Hosting solution is appropriately secured. The Video Hosting solution is categorized as Low using Federal Information Processing Standard (FIPS) 199, Standards for Security Categorization of Federal Information and Information Systems. To prevent any misuse of the data, the solution has auditing measures and technical safeguards commensurate with the National Institute of Standards and Technology (NIST) Recommended Security Controls for Federal Information Systems and Organizations, Special Publication (SP) 800-53, Rev. 3. Additionally, a Certification & Accreditation, including a risk assessment, was conducted prior to implementing the solution.

The FTC has limited access to the solution to select members of FTC staff from the Office of the Chief Information Officer, Office of Public Affairs, and the Division of Consumer and Business Education. Furthermore, not everyone who can access the system can add or alter materials; those rights are limited to specific users. Each FTC member with access to the system is required to fill out and comply with the FTC’s Social Media Rules of Behavior and all FTC staff complete an Information Security and Privacy Training annually. Vendors have limited access to the site for updates, repairs, etc.; however, their access is limited to FTC approval.

Any questions regarding the security of the system should be directed to the FTC’s Information Assurance Manager.

## **SECTION 7.0 – IDENTIFICATION AND MITIGATION OF OTHER PRIVACY RISKS**

### **7.1 – What other privacy risks exist, and how will the agency mitigate those risks?**

The privacy risks posed by this platform for individuals who view the FTC’s videos are low. The analytic data collected from viewers ultimately serves to help the FTC and its vendors to deliver better quality video products. The collected data does not include PII, just information about FTC videos such as the start and stop points of videos viewed and whether or not they were viewed in their entirety.. The FTC’s use of cookies through its video system is outlined in this PIA and in the FTC’s privacy policy.

There are two primary components to the FTC’s video hosting system, a general video page with FTC videos and archives, and a live-webcast page, accessible only during live events. The general video page will adhere to the FTC’s privacy policy. The live webcasts will fall under the privacy policy of the service provider, KnowledgeVision. Users will be shown an exit script when accessing the live-webcast from FTC websites notifying them that a different privacy policy applies. Furthermore, they will be shown an exit script when accessing other third-party sites from the webcast page such as Facebook or Twitter. The applicable privacy policy will be easily accessible from all video-related pages.

As previously outlined, consumers interacting with the FTC’s videos may share links via email and/or social networking sites. Any disclosure of PII or other information, including name, email address or logins and passwords is collected by the third-party sites used for sharing, not by the FTC. Email addresses used to send video links are used by third-party sites only for the purpose of that transaction. Consumers opting to share videos through their social networking channels will be notified prior to sharing that they are accessing a third-party service where the FTC’s privacy policy does not apply. See Section 2.0 for more information.

The Brightcove Video Cloud does provide third-party advertising, but the FTC has disabled this feature for third-party ads. The FTC may use the advertising feature to provide contextual advertisements for other FTC videos available on the FTC’s video platform, but this information is based solely on the current video being viewed, not on any specific information about the consumer viewing the video.

All FTC consumer and business educational videos are also available on the FTC’s official YouTube channel at [www.youtube.com/ftcvideos](http://www.youtube.com/ftcvideos). Due to length restrictions, the FTC’s live webcasts and press conferences are available only on FTC.gov. YouTube may use persistent tracking technologies when using their services. If a consumer is visiting FTC.gov and chooses to interact with YouTube through a link on the FTC.gov website, they will be immediately notified of the change in privacy policies. The FTC distinguishes its official channel on YouTube with agency branding such as use of an official logo and directly links to the Commission’s YouTube channel from the FTC website and vice versa. More information about the FTC’s use of YouTube is available in the [Privacy Impact Assessment for the FTC’s use of that service](#).

FTC staff will continue to monitor its usage of the Brightcove products for any changes that may require revisions to this PIA and the FTC’s privacy policy.

## **SECTION 8.0 – CREATION OR MODIFICATION OF A SYSTEM OF RECORDS**

### **8.1 – Will the FTC’s activities create or modify a “system of records” under the Privacy Act of 1974?**

No. The FTC does not collect PII through use of the Brightcove Video Cloud, thus it does not create or modify a system of records under the Privacy Act of 1974.

## **SECTION 9.0 -- Privacy Policy**

### **9.1 – Confirm that the collection, use, and disclosure of the information in the system has been reviewed to ensure consistency with the FTC’s privacy policy.**

The collection, use, and disclosure of the information in this system has been reviewed to ensure consistency with the FTC privacy policy.

APPROVAL AND SIGNATURE PAGE

Prepared for the Business Owners of the System by:

\_\_\_\_\_  
Cheryl Hackley  
Office of Public Affairs

Date: \_\_\_\_\_

Akamai:

\_\_\_\_\_  
John Sconyers  
Senior Director – VAR Sales and Programs

Date: \_\_\_\_\_

Review:

\_\_\_\_\_  
Jeffrey Smith  
Information Assurance Manager

Date: \_\_\_\_\_

\_\_\_\_\_  
Alex Tang  
Office of the General Counsel

Date: \_\_\_\_\_

\_\_\_\_\_  
Peter Miller  
Chief Privacy Officer

Date: \_\_\_\_\_

\_\_\_\_\_  
Jeffrey Nakrin  
Director, Records and Filings Office

Date: \_\_\_\_\_

Approved:

\_\_\_\_\_  
Jeffrey Huskey  
Chief Information Officer

Date: \_\_\_\_\_