



## PRIVACY THRESHOLD ANALYSIS (PTA)

### CONTACT LISTS

**This form is used to determine whether  
a Privacy Impact Assessment is required.**

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 and the Homeland Security Act of 2002.

Please complete this form and send it to your component Privacy Office. If you do not have a component Privacy Office, please send the PTA to the DHS Privacy Office:

Rebecca J. Richards  
Director of Privacy Compliance  
The Privacy Office  
U.S. Department of Homeland Security  
Washington, DC 20528  
Tel: 703-235-0780

PIA@dhs.gov

Upon receipt, the DHS Privacy Office will review this form. If a PIA is required, the DHS Privacy Office will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the DHS Privacy Office website, [www.dhs.gov/privacy](http://www.dhs.gov/privacy), on DHSOnline and directly from the DHS Privacy Office via email: [pia@dhs.gov](mailto:pia@dhs.gov), phone: 703-235-0780.



## PRIVACY THRESHOLD ANALYSIS (PTA)

Please complete this form and send it to the DHS Privacy Office.  
Upon receipt, the DHS Privacy Office will review this form  
and may request additional information.

### SUMMARY INFORMATION

**DATE submitted for review: May 8, 2010**

**NAME of Project: Integrated Aids to Navigation Information System (I-ATONIS)**

**Name of Component: US Coast Guard**

**Name of Project Manager: LTJG Christina Neiss**

**Email for Project Manager: <Please enter the email address.>**

**Phone number for Project Manger: (202) 372-1572**

**TYPE of Project:**

**Information Technology and/or System\***

**A Notice of Proposed Rule Making or a Final Rule.**

**Other: <Please describe the type of project including paper based Privacy Act system of records.>**

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\* The E-Government Act of 2002 defines these terms by reference to the definition sections of Titles 40 and 44 of the United States Code. The following is a summary of those definitions:

•“Information Technology” means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. See 40 U.S.C. § 11101(6).

•“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).

Note, for purposes of this form, there is no distinction made between national security systems or technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.



## SPECIFIC QUESTIONS

### 1. Describe the project and its purpose:

There are five components of I-ATONIS used to collect personal information: Private Aid to Navigation Owner Contact Information, Wreck Owner Contact Information, Oil Rig Owner Contact Information, Private Property Owner Contact Information, and U.S. Coast Guard Auxiliary Member Contact Information

Collecting the applicant's contact information is important because it allows the Coast Guard to contact the owner should there be a discrepancy or mishap with the aid to navigation. A discrepant aid is one that is not functioning in the manner it was permitted. Types of discrepancies include the light being extinguished, a buoy sinking, or an aid out of position. Certain discrepancies create hazards to navigation and must be immediately corrected or repaired. The contact information is available to Coast Guard aids to navigation personnel and contact is only initiated if the private aid becomes discrepant or in need of repair.

If a Coast Guard unit discovers a discrepant private aid to navigation, the unit will report the discrepancy to the District office and the District office will contact the private aid's owner to effect repairs. Additionally, the Coast Guard solicits the assistance of the Coast Guard Auxiliary to monitor and inspect certain aids to navigation. When a Coast Guard Auxiliary member discovers a discrepant aid to navigation, they complete and submit ANSC 7054 (Aids to Navigation Report). Auxiliary members submit their contact information which includes their First/Last Name, Telephone Number, Region Name, District, Division, and Flotilla Number. When a District office receives an ANSC 7054, the District office will contact the private aid's owner to effect repairs.

I-ATONIS stores information which allows the Coast Guard to contact owners of wrecks, oil rigs, private aids to navigation, private property owners on which an aid to navigation is located, and operators of oil rigs. If the owner designates another individual as the point of contact for the Coast Guard with respect to the wreck, oil rig, private aid, or leased property, the point of contact information is retained as well.

I-ATONIS has program user access controls in place governing who may view or access the contact information. The information is only stored for the purpose of contacting individual points of contact. Only I-ATONIS authorized users may view the contact information collected.

To ensure accuracy of the information collected about them, applicants are provided copies of the approved or disapproved private aid to navigation application. The applicant can revise the original application by submitting a revised application and indicating the application is a "Change" to the original.



I-ATONIS is a password-protected database application available to authorized users within the aids to navigation community. Data analysis is not performed on the personal information maintained in I-ATONIS.

**2. Status of Project:**

- This is a new development effort.  
 This an existing project.

Date first developed:

Date last updated:

<Please provide a general description of the update.>

**3. Is the information collected directly from the individuals seeking information from the Department or working collaboratively with the Department on various projects?**

- Yes.  
 No. Please describe the information source and collection method.

<Please describe the information source and collection method.>

**4. Does the individual have the option to decline submitting the information collected?**

- Yes.  
 No.

**5. Is the information collected limited to non-sensitive personally identifiable information? *An example of sensitive personally identifiable information is the social security number or date of birth.***

- Yes.  
 No.

**6. What information about individuals could be collected, generated or retained?**

An applicant submits either CG Form 2554 (Private Aids to Navigation Application) or CG Form 4143 (Application for Class 1 Private Aids to Navigation on Artificial Islands and Fixed Structures) to the Coast Guard district office where the private aid is to be established. The application is reviewed and approved by the district's aids to navigation staff. The information is entered into I-ATONIS by an authorized staff



user and contains the description and position of the aid to navigation in addition to the applicant's first/last name, title, organization name, address, telephone number, fax number, email address.

A Coast Guard Auxiliary member may submit an ANSC 7054 (Aids to Navigation Report) notifying the district office of the discovery of a discrepant aid to navigation. The Auxiliary member's contact information is entered into I-ATONIS by an authorized staff user and includes the member's First/Last Name, Telephone Number, Region Name, District, Division, and Flotilla Number.

7. **Is the contact information only being used for the purpose for which it originally was collected, i.e., to contact individuals?**

Yes.

No.

8. **With whom could the information be shared?**

Information is available only to those with access to the I-ATONIS system. Contact information is available to Coast Guard aids to navigation personnel at the district office that approved the private aid or where the private property, wreck, or oil rig is located, the local Coast Guard unit in the area where the private aid, property, wreck, or oil rig is located, as well as the Coast Guard Headquarters' Aids to Navigation Program Manager's office (CG-5531). Contact information is only accessed if the owner of the private aid, property, wreck, or oil rig must be notified in the course of Coast Guard aids to navigation related matters.

9. **Are program or project user access controls in place governing who may view or access the contact information?**

Yes.

No.

10. **Has an Authority to Operate from the Chief Information Security Officer been granted to the program or project that the document or database which stores the contact information?**

No.

Yes. Please indicate the determinations for each of the following:

Confidentiality:     Low    Moderate    High    Undefined



**Homeland  
Security**

The Privacy Office  
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**Privacy Threshold Analysis**  
**Version date: June 10<sup>th</sup>, 2009**

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Integrity:  Low  Moderate  High  Undefined

Availability:  Low  Moderate  High  Undefined



## PRIVACY THRESHOLD REVIEW

(To be Completed by the DHS Privacy Office)

DATE reviewed by the DHS Privacy Office: July 12, 2011

NAME of the DHS Privacy Office Reviewer: **Rebecca J. Richards**

### DESIGNATION

- This is NOT a Privacy Sensitive System – the system contains no Personally Identifiable Information.
- This IS a Privacy Sensitive System

#### Category of System

- IT System
- National Security System
- Legacy System
- HR System
- Rule
- Other:

#### Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- A PIA is required
  - System covered by existing PIA: DHS/ALL/PIA-006 DHS General Contact Lists
    - A new PIA is required.
    - A PIA Update is required.
  - A SORN is required
    - System covered by existing SORN: DHS/ALL-002 DHS Mailing and Other Lists System
      - A new SORN is required.



**Homeland  
Security**

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**DHS PRIVACY OFFICE COMMENTS**