Template Version Number: 01-2021

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

Privacy Threshold Analysis
for the
Patent Business and Content Management Services (PBCMS) EventHub (EventHub)

U.S. Department of Commerce Privacy Threshold Analysis

USPTO Patent Business and Content Management Services (PBCMS) EventHub (EventHub)

Unique Project Identifier: PPL-PBCMS-01-00

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: *Provide a brief description of the information system.*
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).

EventHub services provides file transformation functionality for the USPTO enterprise. As part of the file transformation, the system captures metadata related to the files. This metadata is stored locally within Amazon Web Services (AWS) cloud managed by USPTO Amazon Cloud Services (UACS) and provided to the requesting system/application for processing. EventHub is implemented in AWS cloud by leveraging its services to provide resiliency, scalability and reliability. The boundary for EventHub is contained within UACS environment.

Address the following elements:

a) Whether it is a general support system, major application, or other type of system
EventHub is a major application.

b) System location
EventHub is a cloud system within Amazon Web Services (AWS) East/West multiple availability zones.

c) Whether it is a standalone system or interconnects with other systems (identifying and describing any other systems to which it interconnects)
EventHub interacts with the following systems:

- **USPTO AWS Cloud Services (UACS)** is a general support system and standard infrastructure platform used to support PTO Application Information Systems (AIS) hosted in the AWS East/West environment. The AWS East/West environment is comprised of several sub-components including, Virtual Private Cloud (VPC), Elastic Cloud Computing (EC2), Identity and Authentication Management (IAM), and Simple Storage Service.

- **Network and Security Infrastructure System (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 USPTO IT applications.
- **Enterprise Software Services (ESS)** is a system that provides Enterprise Directory Services, Role-Based Access Control System, Email as a Service, PTO Exchange Services, Symantec Endpoint Protection, Enterprise SharePoint Services, etc.
- **Patent Capture and Application Processing System - Capture and Initial Processing (PCAPS-IP)** is a major application, and supports initial patent application process with data capture, application processing, and reporting.

d) The purpose that the system is designed to serve

The purpose of the system is to facilitate migrating current legacy services to new cloud-based services that leverage cloud native capabilities and technologies, which helps to reduce infrastructure and operational maintenance cost to the USPTO.

e) The way the system operates to achieve the purpose

The EventHub system achieves its purpose by providing enterprise service pattern that can be leveraged by USPTO systems for processing documents conversion.

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

EventHub processes and stores events, data, or telemetry produced by distributed software and devices. For example, real patent application data from USPTO and audit logs are the types of information collected, maintained, used, or disseminated by EventHub.

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

Individuals who have access to the system include USPTO employees and contractors.

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

The common components will have User Interfaces (UIs) that utilize the Application Programming Interfaces (APIs) provided by the Event Collector common component. To date, no other common components have users.

i) How information is transmitted to and from the system

The common components currently use APIs to transmit information. The APIs are on AWS and APIs in other common services.

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	☐	d. Significant Merging	☐	g. New Interagency Uses	☐
b. Anonymous to Non-Anonymous	☐	e. New Public Access	☐	h. Internal Flow or Collection	☐
c. Significant System Management Changes	☐	f. Commercial Sources	☐	i. Alteration in Character of Data	☐
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. *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	☐	Building entry readers	☐
Video surveillance	☐	Electronic purchase transactions	☐
Other (specify):			

☒ 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.

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

☒ The criteria implied by one or more of the questions above **apply** to the **EventHub (EventHub)** and as a consequence of this applicability, a PIA will be performed and documented for this IT system.

☐ The criteria implied by the questions above **do not apply** to the **EventHub (EventHub)** and as a consequence of this non-applicability, a PIA for this IT system is not necessary.

System Owner Name: Hai Luong Office: Office of Patent Automation (P/OPA) Phone: (571) 272-3379 Email: Hai.Luong@uspto.gov Signature: Users, Luong, Hai Digitally signed by Users, Luong, Hai Date: 2022.03.31 09:02:42 -04'00' Date signed: _____	**Chief Information Security Officer** Name: Don Watson Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-8130 Email: Don.Watson@uspto.gov Signature: Users, Watson, Don Digitally signed by Users, Watson, Don Date: 2022.03.31 09:28:23 -04'00' Date signed: _____
Privacy Act Officer Name: Ezequiel Berdichevsky Office: Office of General Law (O/GL) Phone: (571) 270-1557 Email: Ezequiel.Berdichevsky@uspto.gov Signature: Users, Berdichevsky, Ezequiel Digitally signed by Users, Berdichevsky, Ezequiel Date: 2022.03.22 09:22:55 -04'00' Date signed: _____	**Bureau Chief Privacy Officer and Co-Authorizing Official** Name: Henry J. Holcombe Office: Office of the Chief Information Officer (OCIO) Phone: (571) 272-9400 Email: Jamie.Holcombe@uspto.gov Signature: Users, Holcombe, Henry Digitally signed by Users, Holcombe, Henry Date: 2022.04.01 13:26:29 -04'00' Date signed: _____
Co-Authorizing Official Name: Andrew Faile Office: Office of the Commissioner for Patents Phone: (571) 272-8800 Email: Andrew.Faile@uspto.gov Signature: Users, Faile, Andrew Digitally signed by Users, Faile, Andrew Date: 2022.04.01 14:15:26 -04'00' Date signed: _____	