

Privacy Impact Assessment for

MyTSA Mobile Application

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Abstract

Transportation Security Administration's (TSA) *MyTSA* consists of a mobile and an iTunes application that provides the traveling public access to relevant TSA travel information via any mobile phone with internet access. *MyTSA* enables individuals to access such information as the types of items that may be carried through TSA security checkpoints, basic information regarding TSA checkpoint policy, estimated wait times at TSA checkpoints, and current travel conditions. The MyTSA application does not collect or use personally identifiable information. This Privacy Impact Assessment (PIA) addresses the privacy impact of TSA's use of mobile media for delivering information to the public.

Introduction

The bulk of traffic to the TSA website (www.tsa.gov) comes from members of the traveling public seeking information on air travel, such as what items can be brought through the security checkpoint and what items can be carried inside of checked baggage. TSA seeks to simplify the security checkpoint experience and reduce the amount of stress associated with air travel.

To further accomplish this goal, TSA is releasing *MyTSA* free mobile and iTunes application, as an alternative means of providing information available through its website to the traveling public. Additionally, *MyTSA* will provide data on security checkpoint wait times. The tool will also make use of a data feed provided by the Federal Aviation Administration (FAA) regarding airport delays due to weather or other factors outside of TSA's control. None of the *MyTSA* capabilities require individuals to provide personally identifiable information (PII) and TSA does not collect PII from users or user devices using the *MyTSA* application. The *MyTSA* terms of service is available to users prior to downloading the application or updates.

Individuals may download the *MyTSA* mobile application, including application updates, through TSA's website. TSA does not require individuals to register or provide any PII as a condition of downloading or using *MyTSA*. Individuals who download the *MyTSA* mobile application from TSA's website are subject to TSA's website privacy policy.²

Alternatively, individuals may download the application and updates from iTunes (www.itunes.apple.com). Individuals downloading the *MyTSA* iTunes application are required to fulfill Apple, Inc's (Apple) registration requirements prior to downloading the application. Apple's registration requirements and privacy policy may be found at www.apple.com. TSA does not receive any of the registration information provided to Apple.

¹ Unless otherwise noted MyTSA refers to both the mobile and the iTunes versions of the application.

² TSA public website privacy policy - http://www.tsa.gov/research/reading/regs/editorial_1773.shtm

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MyTSA is an integrated package of five feature sets; Home, Can I Bring?, TSA Guide, Wait Times, and Airport Status. Individuals using the MyTSA application on either iPhone or iPod Touch devices may take full advantage of all feature sets. Users of other mobile devices and standard web browsers may access all MyTSA content and features; however some features may not be operational due to technology limitations of these specific devices. The MyTSA Wait Time and Airport Status capabilities require internet access for full functionality.

<u>Home</u>

Home consists of two principle sub-functions; Establishing User's Location and Got Feedback?. Upon launching the MyTSA iTunes application for the first time, users are requested by the application to permit the application to use the device's Global Positioning System (GPS) capability to identify the closest airport location. Utilizing the GPS option allows MyTSA to automatically locate the device's location upon application launch. The user's location is detected by the device's GPS function and is not transmitted to TSA. The mobile device stores the location information locally and does not transmit its location to TSA.

Individuals using the MyTSA mobile application on devices that do not support GPS services or who choose not to use their device's GPS capabilities must manually select their current airport location each time MyTSA is launched.

Home also allows individuals to provide anonymous feedback to TSA concerning their TSA/airport experience. Individuals may use the device's web services capabilities to submit a short message (not more than 4000 characters) describing their encounter and encounter location. (e.g., Line at Gate 1 is moving quickly.) If configured to permit auto location detection, the MyTSA application loaded on the individual's device will auto-populate the location field based on the device's GPS information; however individuals may manually change the location as required. Once received by TSA, the message and airport encounter information are integrated with TSA's national Got Feedback? program. Due to the anonymous nature of the submission, TSA cannot provide individualized responses to submitted feedback. TSA's website (http://www.tsa.gov/gotfeedback) provides additional information on Got Feedback?.

Can I Bring?

Can I Bring? enables individuals to type in a query to determine if a particular item may be carried through the TSA security checkpoint or should be placed in checked baggage. Individuals query the item to be brought through the checkpoint, e.g. liquid, and the Can I Bring? function returns an answer based on current TSA policy. The information in the Can I Bring? database is the same as that found in the prohibited items list posted on TSA's public website.³ Can I Bring? does not require internet access for full functionality.

³ http://www.tsa.gov/travelers/airtravel/prohibited/permitted-prohibited-items.shtm.

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If an item is not listed in the *Can I Bring?* database, it may be submitted for consideration in future *MyTSA* releases via the application's "item not found" function. For example, if the individual entered, "chainsaw" the function would return the result, "Item not found." The option allows the user to push a button labeled, "Submit Item" and TSA receives an email from the TSA web service with the message content containing the suggested item (i.e., chainsaw). TSA may use this information to make changes to the *Can I Bring?* database.

Passengers are also advised that for passenger safety, any items that are not on the prohibited items list but alarm during the screening process or appear to have been tampered with may require additional screening and may not be allowed through the checkpoint or in checked baggage. The final decision rests with TSA on whether or not to allow items onboard the aircraft.

TSA Guide

The *TSA Guide* mirrors the information on the TSA website's Frequently Asked Questions (FAQs) page (http://www.tsa.gov/travelers/index.shtm). The *TSA Guide* provides information on such subjects as; "What kind of ID will I need?", "How should I pack my liquids?", "What if I have special medical needs?", "What if I am in the military?" through a series of individual screen pages. Internet access is not required to use the *TSA Guide* function.

Wait Times

Wait Times provides individuals a means of voluntarily helping fellow travelers plan for their TSA checkpoint experience by posting and viewing wait times. Using these features, individuals may select from the following predetermined list of options: No Wait; 1 – 10 min; 11 – 20 min; 21- 30 min; 31+ min; to identify how long it took the individual to clear the checkpoint once they entered the checkpoint queue. The individual's selection is publically posted using the MyTSA TwitterTM account (Twitter.com/MyTSA). TSA uses only the MyTSA Twitter account and does not allow individuals to use their personal accounts for this service. As a result all tweets are anonymous and preclude the possibility of tracing them back to any individual. Wait Times requires internet access for full functionality.

Airport Status

The Federal Aviation Administration (FAA) publishes a near real-time Extensible Markup Language (XML) feed to the FAA.com public website containing current travel conditions of all U.S. airports. *MyTSA*'s *Airport Status* feature uses the FAA XML feed to display airport delay information. The *Airport Status* feature also contains a graphical view of the United States which displays the current travel conditions. *Airport Status* requires internet access for full functionality.

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Fair Information Practice Principles (FIPPs)

The Privacy Act of 1974 articulates concepts of how the Federal government should treat individuals and their information, and imposes duties upon federal agencies regarding the collection, use, dissemination, and maintenance of personally identifiable information. The Homeland Security Act of 2002 Section 222(2) states that the Chief Privacy Officer shall assure that information is handled in full compliance with the fair information practices as set out in the Privacy Act of 1974 and shall assure that technology sustains and does not erode privacy.

In response to this obligation, the DHS Privacy Office has developed a set of Fair Information Practice Principles (FIPPs) from the underling concepts of the Privacy Act, which encompass the full breadth and diversity of the information and interactions of DHS. The FIPPs account for the nature and purpose of the information being collected in relation to DHS's mission to preserve, protect, and secure. Given the particular technologies and the scope and nature of their use, TSA used the DHS Privacy Office FIPPs PIA template.

1. Principle of Transparency

Principle: DHS should be transparent and provide notice to the individual regarding its collection, use, dissemination, and maintenance of personally identifiable information (PII). Technologies or systems using PII must be described in a SORN and PIA, as appropriate. There should be no system the existence of which is a secret.

TSA will not collect PII or location information from users of the *MyTSA* application. TSA does not receive any information from Apple concerning individuals who may download the *MyTSA* application from its site. This PIA and the TSA website provides information to the public on *MyTSA*. Further, notice will be provided in a terms of service and privacy policy available to the user prior to application download.

2. Principle of Individual Participation

Principle: DHS should involve the individual in the process of using PII. DHS should, to the extent practical, seek individual consent for the collection, use, dissemination, and maintenance of PII and should provide mechanisms for appropriate access, correction, and redress regarding DHS's use of PII.

MyTSA serves as an alternative means of providing information available through the TSA public website to the traveling public. TSA does not require individuals to register or provide any PII as a condition of downloading or using MyTSA. Individuals downloading the MyTSA iTunes application must fulfill Apple's registration requirements prior to downloading the application. Apple does not provide TSA any PII of individuals who download the MyTSA application from its site. Individuals who download the MyTSA mobile application from TSA's



public website or use standard web browsers to access *MyTSA* features are subject to TSA's website privacy policy, which is provided to the user prior to the application being downloaded.

3. Principle of Purpose Specification

Principle: DHS should specifically articulate the authority which permits the collection of PII, to include images, and specifically articulate the purpose or purposes for which the PII is intended to be used.

None of the *MyTSA* capabilities require individuals to provide personally identifiable information (PII) and TSA does not collect PII from users or user devices using the *MyTSA* application. The *MyTSA* terms of service is available to users prior to downloading the application or updates.

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Upon launching the *MyTSA* iTunes application for the first time, users are requested by the application to permit the application to use the device's GPS capability to identify the closest airport location. Utilizing the GPS option allows *MyTSA* to automatically locate the device's location upon application launch. The user's location is detected by the device's GPS function and is not transmitted to TSA. The mobile device stores the location information locally and does not transmit its location to TSA. Individuals using the *MyTSA* mobile application, devices that do not support GPS services or who choose not to use their device's GPS capabilities must manually select their current airport location each time *MyTSA* is launched.

The *MyTSA* application supports TSA's goals of improving passengers' security checkpoint experience and reducing the amount of stress associated with air travel.

4. Principle of Minimization

Principle: DHS should only collect PII that is directly relevant and necessary to accomplish the specified purpose(s) and only retain PII for as long as is necessary to fulfill the specified purpose(s). PII should be disposed of in accordance with DHS records disposition schedules as approved by the National Archives and Records Administration (NARA).

⁴ TSA public website privacy policy - http://www.tsa.gov/research/reading/regs/editorial_1773.shtm

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5. Principle of Use Limitation

Principle: DHS should use PII solely for the purpose(s) specified in the notice. Sharing PII outside the Department should be for a purpose compatible with the purpose for which the PII was collected.

None of the *MyTSA* capabilities require individuals to provide PII and TSA does not collect PII from users or user devices using the *MyTSA* application. Accordingly, there is no PII to be used by TSA and no PII to be shared outside DHS. The *MyTSA* terms of service is available to users prior to downloading the application or updates.

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⁵ TSA public website privacy policy - http://www.tsa.gov/research/reading/regs/editorial 1773.shtm

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transmitted to TSA. Individuals using the *MyTSA* mobile application, devices that do not support GPS services or who choose not to use their device's GPS capabilities must manually select their current airport location each time *MyTSA* is launched.

6. Principle of Data Quality and Integrity

Principle: DHS should, to the extent practical, ensure that PII, including images, is accurate, relevant, timely, and complete, within the context of each use of the PII.

TSA will not collect PII from the users of the MyTSA application. Accordingly, there are no data quality or integrity aspects to evaluate.

7. Principle of Security

Principle: DHS should protect PII, including images, through appropriate security safeguards against risks such as loss, unauthorized access or use, destruction, modification, or unintended or inappropriate disclosure.

TSA will not collect PII from users of the *MyTSA* application. Accordingly there is no PII in TSA possession to lose, be accessed in an unauthorized manner, or be subject to any other privacy risk.

8. Principle of Accountability and Auditing

Principle: DHS should be accountable for complying with these principles, providing training to all employees and contractors who use PII, including images, and should audit the actual use of PII to demonstrate compliance with these principles and all applicable privacy protection requirements.

TSA will not collect PII from users of the *MyTSA* application. TSA staff responsible for developing the *MyTSA* application undergo privacy and Privacy Act training developed by the DHS Privacy Office for the Department. Supervisors will ensure that policies and procedures are fully enforced. In addition, administrative controls imposed by the operating protocols and technical controls in the application also enforce accountability

Conclusion

MyTSA is a mobile application that provides the traveling public access to relevant TSA travel information via any mobile phone with internet access. It is made available as a public service and the public is not required to use it in order to obtain information from TSA. TSA does not collect any PII as part of MyTSA. MyTSA enables individuals to query the types of items that may be carried through TSA security checkpoints, provides basic information



regarding TSA checkpoint policy, provides estimated wait times at TSA checks points and current travel conditions of all airports in the United States.

Responsible Officials

Lynn Dean Senior Communications Advisor Transportation Security Administration

Approval Signature Page

Original signed and on file with the DHS Privacy Office

Mary Ellen Callahan Chief Privacy Officer Department of Homeland Security