



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Carolyn B. Maloney  
Chairwoman  
Committee on Oversight and Government Reform  
U.S. House of Representatives  
2157 Rayburn House Office Building  
Washington, DC 20515

Dear Chairwoman Maloney:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>11</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

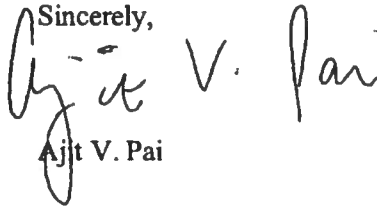
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>11</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Chris Coons  
Ranking Member  
Committee on Appropriations  
Subcommittee on Financial Services and General Government  
United States Senate  
125 Hart Senate Office Building  
Washington, D.C. 20510

Dear Senator Coons:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>4</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

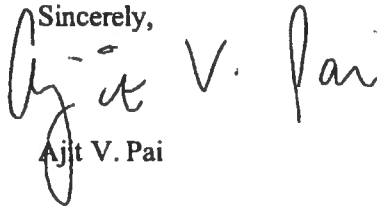
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's

---

<sup>4</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

work on this modernization effort, coupled with our mitigation of GAO's recommendations, will resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Frank Pallone  
Chairman  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Chairman Pallone:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>7</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

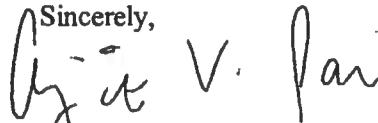
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>7</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Gary Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate  
442 Hart Senate Office Building  
Washington, D.C. 20510

Dear Senator Peters:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>10</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

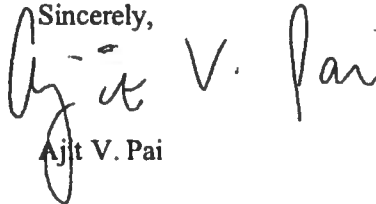
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>10</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez





FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Greg Walden  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2322A Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Walden:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>8</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

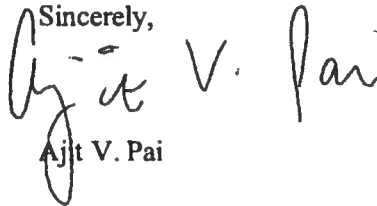
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>8</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable John N. Kennedy  
Chairman  
Committee on Appropriations  
Subcommittee on Financial Services and General Government  
United States Senate  
S-128 The Capital Building  
Washington, D.C. 20510

Dear Chairman Kennedy:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>3</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

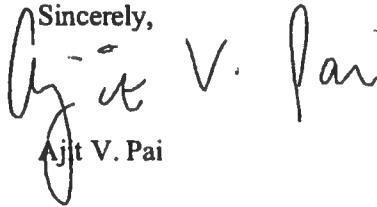
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's

---

<sup>3</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

work on this modernization effort, coupled with our mitigation of GAO's recommendations, will resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Maria Cantwell  
Ranking Member  
Committee on Commerce, Science, and Transportation  
United States Senate  
425 Hart Senate Office Building  
Washington, D.C. 20510

Dear Senator Cantwell:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>6</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

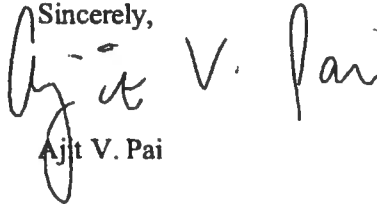
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>6</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Mark Meadows  
Ranking Member  
Committee on Oversight and Government Reform  
U.S. House of Representatives  
2471 Rayburn House Office Building  
Washington, DC 20515

Dear Congressman Meadows:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>12</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

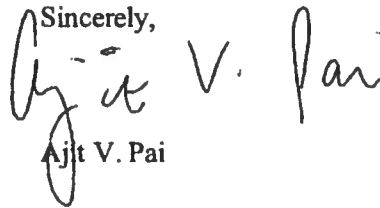
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>12</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez





FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Mike Quigley  
Chairman  
Committee on Appropriations  
Subcommittee on Financial Services and General Government  
U.S. House of Representatives  
2000 Rayburn House Office Building (G Floor)  
Washington, D.C. 20515

Dear Chairman Quigley:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>1</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

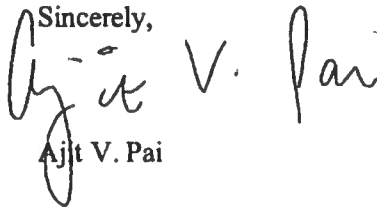
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's

---

<sup>1</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

work on this modernization effort, coupled with our mitigation of GAO's recommendations, will resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Roger Wicker  
Chairman  
Committee on Commerce, Science, and Transportation  
United States Senate  
512 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Chairman Wicker:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>5</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

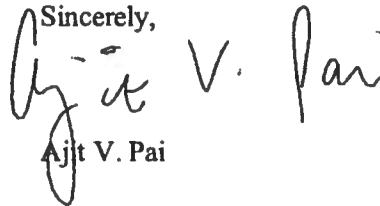
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>5</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Ron Johnson  
Chairman  
Committee on Homeland Security and Governmental Affairs  
United States Senate  
340 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Chairman Johnson:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>9</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

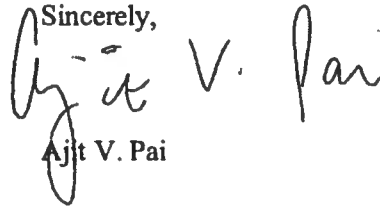
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's work on this modernization effort, coupled with our mitigation of GAO's recommendations, will

---

<sup>9</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

March 11, 2020

The Honorable Tom Graves  
Ranking Member  
Committee on Appropriations  
Subcommittee on Financial Services and General Government  
U.S. House of Representatives  
1016 Longworth Office Building  
Washington, D.C. 20515

Dear Congressman Graves:

In response to a May 2017 incident in which a surge in comments caused disruption to the Commission's Electronic Comment Filing System (ECFS), GAO was asked to review both (1) the actions that the Commission took in response to the May 2017 event, and (2) the extent to which the FCC has implemented security controls to effectively protect the confidentiality, integrity, and availability of ECFS and two related FCC systems. As a result of that investigation, on September 26, 2019, the Government Accountability Office (GAO) issued a limited official-use only (LOUO) report entitled *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU (Report).<sup>2</sup>

During the course of its review, GAO shared with the Commission a draft of its Report, which identified a number of issues with the Commission's information security program and made 136 recommendations for correcting those issues. In a September 13, 2019, response to this draft report, the FCC Managing Director concurred with GAO's recommendations, noted that the Commission submitted evidence to GAO that we had mitigated 83 of those recommendations, and explained the Commission's timeline for addressing the remaining 53 recommendations. Based on the FCC's response and subsequent actions taken in response to the draft report, the GAO has closed 85 of its 136 recommendations as having been addressed by the agency. With respect to the remaining 51 recommendations, the FCC has specific plans in place to complete mitigation of all the recommendations by April 2021. As the Managing Director noted in his response to GAO, some of the outstanding findings will be addressed in the course of system modernization and cloud transition efforts that we have already initiated, including updates for ECFS.

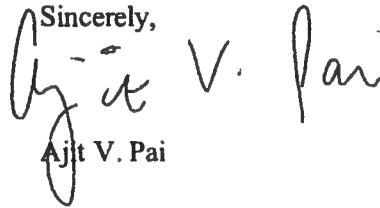
Information security is among the FCC's top priorities, and it plays a critical role in safeguarding the confidentiality, integrity, and availability of our major IT systems. For this reason, the FCC implemented a multi-year strategic effort to modernize our IT capabilities. As noted in the Managing Director's response to GAO, moving our IT infrastructure and applications to a cloud-based architecture will allow us to deliver secure, scalable, and reliable systems for both internal FCC business and for our public-facing systems. The Commission's

---

<sup>2</sup> GAO, *FCC Improved Its Electronic Comment System, but Needs to Remedy Additional Control Weaknesses*, GAO 19-247SU.

work on this modernization effort, coupled with our mitigation of GAO's recommendations, will resolve the security vulnerabilities identified in the Report and strengthen our information security going forward.

I appreciate the GAO's thorough analysis and recommendation. Thank you for the opportunity to respond to the Report, and please let me know if you require further assistance on this subject.

Sincerely,  
  
Ajit V. Pai

cc: The Honorable Diane DeGette  
The Honorable Mike Doyle  
The Honorable Gerald Connolly  
The Honorable Brian Schatz  
The Honorable Yvette Clarke  
The Honorable Debbie Dingell  
The Honorable Elliot Engel  
The Honorable Gregory Meeks  
The Honorable Hakeem Jeffries  
The Honorable Robin Kelley  
The Honorable Jerry McNerney  
The Honorable Paul Tonko  
The Honorable Nydia Velazquez