

Comments on Notice of a New System of Records

These comments are in response to a Federal Register Notice of July 22, 2011 concerning the creation of a new system of records for DOI Social Media.

I am a retired Data Miner from Minerals Management Service (MMS). My comments will address the IT aspects of the notice.

STORAGE [page 44035]

This section states: electronic records are contained in removable drives, computers, e-mail and electronic databases

A distinction needs to be made between hardware and software systems.

First removable drives and computers are hardware. I suspect that Network Attached Storage devices will also be used. I suspect the backup for offsite storage will be some kind of magnetic tape media. There are potentially other types of hardware employed to contain the records.

Next e-mail and electronic databases are software systems. A more appropriate software for this function is a document management system. MMS was implementing a document management system after my retirement.

When I was at MMS all e-mail was archived. This was required as part of the Cobell litigation. I suspect other DOI agencies were also doing this. How does this social media records system interact with the existing email record keeping?

SAFEGUARDS [page 44035]

This section states: Access to the servers containing records in this system is limited to DOI personnel

During my time at MMS the servers were managed by contractors, not DOI personnel. Further contractors provided the initial level of help desk support.

This section also states: DOI servers storing this information are located in secured DOI facilities

For MMS Royalty function which is located in Denver, CO had its data center at a contractor site in Annapolis, MD. Further the DOI IT Transformation Strategic Plan advocates moving from data centers (DOI facilities) to cloud computing (external hosting).

Both these sections need to be rewritten to reflect the current IT environment across the department and the future plans of the department.

Ted D. Tupper
PO Box 504
Pine Beach, NJ 08741