August 9, 2023

Darice Gamble
Agency Records Officer (Acting)
Federal Communications Commission
45 L Street NE Washington, DC 20554
OMD/OCIO – Suite 3.308

Dear Darice Gamble,

We have received the Federal Communications Commission’s (FCC) self-report of a technical error that inadvertently deleted 2.1 million documents concerning the eligibility of subscribers who applied for the Lifeline and/or the Affordable Connectivity Program (ACP). The documents affected were submitted between September 2022 and January 2023.

On June 7, 2023, during an audit, Universal Service Administrative Company (USAC), the administrators of the Universal Service Fund Programs and funds for the federally appropriated programs, became aware of a technical error that caused the deletion. While transferring storage from ServiceNow to Amazon Web Service (AWS), in accordance with the system’s protocol, the system deleted documents that were incorrectly identified as complete.

In order to prevent the system from repeating this action again, USAC has updated its processes related to system monitoring and has modified procedures covering systems that delete information. These changes will allow USAC to take a more proactive approach to detecting and preventing errors related to data transfers. USAC is currently working with ServiceNow and Accenture to attempt to recover a portion of the deleted documents through ServiceNow’s archives and stored backups.

In accordance with 36 CFR 1230.16(b), NARA requests a report from FCC within 30 days of the completion of their recovery process with ServiceNow and Accenture. The report should detail the final outcome and, if there are any changes, provide the volume and description of the records recovered and the records deleted. This case will remain open until NARA receives FCC’s
final report. I appreciate your attention to this matter. If you have any questions or wish to discuss this further, please contact me at laurence.brewer@nara.gov.

Sincerely,

LAURENCE BREWER
Chief Records Officer
for the U.S. Government

cc: Vanessa Lamb, Senior Agency Official for Records Management, vanessa.lamb@fcc.gov
January 31, 2024

Christina Bartlett
Agency Records Officer
Federal Communications Commission
45 L Street NE Washington, DC 20554

Dear Christina Bartlett,

The National Archives and Records Administration (NARA) has received the Federal Communications Commission’s (FCC) self-report of a technical error that inadvertently deleted 2.1 million documents concerning the eligibility of subscribers who applied for the Lifeline and/or the Affordable Connectivity Program. The documents affected were submitted between September 2022 and January 2023. After further investigation, the FCC discovered that only 1.7 million documents were deleted.

NARA acknowledges all of the efforts made to recover the documents. As of December 22, 2023, it was confirmed that 14,500 documents associated with a total of 5,700 applicants were successfully recovered and have been transmitted back to the Universal Service Administrative Company via a secure, cloud-based storage application. FCC has instituted safeguards including an updated process for system monitoring and modified procedures covering systems that delete information. These safeguards allow for a more proactive approach to detecting and preventing errors related to data transfers.

Based on the information provided in your report, NARA considers this matter resolved. Please notify us if additional files are recovered in this case. Thank you for your attention to this matter. If you have any questions, please contact me at laurence.brewer@nara.gov.

Sincerely,

LAURENCE BREWER
Chief Records Officer
for the U.S. Government
cc: Georgette Sumpter, Deputy CIO for Programs and Plans, Senior Agency Official for Records Management