



U.S. Department of Justice

National Security Division

U.S. FOREIGN
INTELLIGENCE
SURVEILLANCE COURT

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Washington, D.C. 20530

March 1, 2021

LEEANN FLYNN HALL
CLERK OF COURT

The Honorable James E. Boasberg
United States Foreign Intelligence Surveillance Court
333 Constitution Avenue, N.W.
Washington, D.C. 20001

Re: *In Re Accuracy Concerns Regarding FBI Matters Submitted to the FISC*,
Docket No. Misc. 19-02

Dear Judge Boasberg:

(U) The Government respectfully submits this update regarding technological improvements the Federal Bureau of Investigation (FBI) is undertaking to aid in consistency and accountability within the FISA application process.

(U) On March 5, 2020, the Court entered an Order directing the Government to provide by March 27, 2020, "a description of any planned or implemented technological improvements to the process of preparing FISA applications or verifying the information contained in FISA applications and updates every thirty days thereafter until they have been fully implemented." Corrected Opinion and Order of the Foreign Intelligence Surveillance Court (the Court) entered on March 5, 2020 (March 5, 2020 Order) at 17. Following the Court's grant of a one-week extension, the Government filed a response to the March 5, 2020 Order on April 3, 2020.¹ The Government subsequently provided the Court with updates regarding technological improvements to the process of preparing, or verifying the information contained in, FISA applications on April 30, 2020 (April 30 Response),² and again on May 29, 2020 (May 29 Letter).³ On June 4, 2020, the Government submitted a Motion to Modify Reporting Period requesting that subsequent updates be provided to the Court every ninety days rather than every thirty days. On June 23, 2020, the Court issued an Order granting the requested modification, and the Government subsequently filed updates on August 31, 2020 (August 31 Letter) and November 30, 2020. (November 30 Letter).⁴

¹ (U) Response to the Court's Corrected Opinion and Order Dated March 5, 2020 and Update to the Government's January 10, 2020 Response, at 19-20.

² (U) Supplemental Response to the Court's Order Dated December 17, 2019; the Court's Scheduling Order Dated January 17, 2020; and the Court's Corrected Opinion and Order Dated March 5, 2020, Attachment A at 10-12.

³ (U) Letter from Kevin O'Connor, Chief, Oversight Section to the Honorable James E. Boasberg (May 29, 2020).

⁴ (U) Letter from Kevin O'Connor, Chief, Oversight Section to the Honorable James E. Boasberg (August 31, 2020); Letter from Kevin O'Connor, Chief, Oversight Section to the Honorable James E. Boasberg (November 30, 2020).

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(U) As explained previously, the FBI currently manages its FISA-related workflow processes in a platform called the FISA Management System (FISAMS) but is transitioning to a system colloquially known as "the Bridge." The Bridge is designed to increase collaboration within FBI, as well as between FBI and the Office of Intelligence. It is not expected to replace FISAMS until at least the end of the fourth quarter of fiscal year 2021.

(U) Several design features of the Bridge also are expected to enhance accuracy in the FISA process. As discussed in the April 30 Response, these include, for example, creating a technical interface between the Bridge and the FBI's case management system, known as Sentinel. As set forth in the May 29 and August 31 Letters, this interface will afford FBI personnel using the Bridge the ability to ensure a high level of data integrity, by automatically cross-referencing data input in the Bridge with existing case data in Sentinel. The interface between the Bridge and Sentinel also will provide FBI users the ability to serialize to Sentinel documents created in, or required for, the Bridge, including documents necessary for the creation of an accuracy subfile. The FBI believes that automating these processes and ensuring that relevant documents are routinely serialized and/or easily uploaded into FBI systems will improve the FISA process by reducing inadvertent errors; providing ready access to documents for review and analysis; and promoting collaboration between all parties involved in the FISA process.

(U) The FBI's efforts to develop and implement the Bridge are continuous and ongoing. During this reporting period, the Bridge team successfully established the system's cloud computing subscription on the SECRET enclave and tested the Bridge's access from the FBI's internal SECRET network environment. Having previously enlisted users from across the FBI to conduct testing, which resulted in the submission of several suggestions for improving the system, the team recently integrated user input into the system. For example, based on user feedback, the team redesigned the user interface for a section of the electronic surveillance and physical search FISA initiation request form. The team then conducted in-depth, detailed reviews of the form by way of finalizing its interface in the Bridge. In addition, the team developed and deployed workflow processes within the system for FISA amendment and renewal requests. In the near term, the team anticipates integrating into the Bridge emergency and expedited FISA request forms and workflow processes; business record and pen register and trap and trace request forms and workflow processes; and the FISA Verification Form and its workflow processes.

(U) As discussed in the August 31 and November 30 Letters, the FBI also is working on technological improvements related to its accuracy procedures, also known as the Woods Procedures, which will ultimately be integrated into the Bridge. These efforts are designed to use Sentinel to automate certain processes FBI personnel use to create accuracy subfiles and ensure the contents thereof are available in a manner that is consistent with the FBI's FISA minimization procedures. During the prior reporting period, the FBI completed development of a feature in Sentinel that will interface with the Bridge and allow FBI personnel to export an accuracy subfile that can be downloaded and transmitted to other FBI personnel involved in the FISA process. Recently, the Bridge team demonstrated this feature to stakeholders within the FBI and DOJ. The team also deployed the feature to production, so that, in the near term, it can be operationally tested in a few select FBI field offices. The FBI believes this feature will

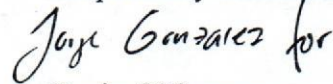
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enhance the accuracy and completeness of FISA applications by, for example, making documents readily available to those FBI personnel working on applications and/or attesting to their accuracy.

(U) This letter constitutes the Government's fifth update in the above-captioned docket regarding planned or implemented technological improvements. The FBI has reviewed this response and confirmed its accuracy.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kevin O'Connor for".

Kevin O'Connor
Chief, Oversight Section
Office of Intelligence,
National Security Division
U.S. Department of Justice

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