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U.S. Department of Justice

National Security Division

U.S. FOREIGN
INTELLIGENCE
SURVEILLANCE COURT

2022 MAY 31 PM 12: 58

Washington, D.C. 20530

MAURA PETERSON
CLERK OF COURT

May 31, 2022

The Honorable Rudolph Contreras
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 Contreras:

(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 Foreign Intelligence Surveillance Act (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 modification permitting updates to be provided to the Court every ninety days, the Government has filed periodic updates, including, most recently, on February 28, 2022.¹

(U) As explained previously, the FBI is continuing to work towards transitioning the Foreign Intelligence Surveillance Act (FISA) processes currently handled in a platform called the FISA Management System (FISAMS) into a system colloquially known as "the Bridge." During prior reporting periods, the Bridge team developed and deployed for testing certain FISA request forms, workflows in support of those forms, an integrated enterprise Classification Marking Tool (CMT), and several processes relating to the role of the Confidential Human Source (CHS) Handler. During this reporting period, the Bridge team deployed and tested production network configuration successfully and validated both primary and secondary network paths. The team also successfully deployed the Bridge to a key pre-production environment and performed an initial full end-to-end validation of the product. Finally, the team developed and deployed for testing the FISA Verification forms for the initiation and amendment of FISA Business Records

¹ (U) Letter from Kevin O'Connor, Chief, Oversight Section to the Honorable Rudolph Contreras (February 28, 2022).

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(BR) and Pen Register Trap and Trace (PRTT) requests, as well as developing and deploying for testing certain workflow process for BR, PRTT, and requests pursuant to Titles I and III of FISA.

(U) As discussed in previous 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 with the Bridge. These efforts are designed to use Sentinel to streamline 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. Previously, the FBI completed development of a feature in Sentinel called the Electronic Woods Capability (EWC) that interfaces with the Bridge and allows FBI personnel to export an accuracy subfile that can be downloaded and transmitted to other personnel involved in the FISA process. As described previously, following successful testing, the Sentinel team deployed the EWC to production and operationally tested it in select FBI field offices. Following successful testing, the EWS was deployed enterprise wide in or about July 2021, to align with the transition the FBI contemporaneously made to require, when permissible, electronic FISA accuracy subfiles. The team also created video tutorials highlighting the features of the tool and, with the FBI's National Security and Cyber Law Branch, provided virtual training sessions to FBI personnel to explain the purpose and capabilities of the tool. The EWC provides for the secure and on-demand creation of a certified document package for the Department of Justice's (DOJ) review. It significantly reduces the need for hard-copy printouts and enables reliable version control, document integrity, tracking and auditing. As the product has been deployed, it is currently in an operational state. Thus, the team is focusing on making incremental adjustments to address maintenance issues that arise during the tool's operation by users.

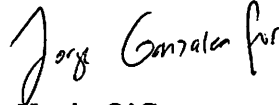
(U) Finally, consistent with an Office of the Inspector General recommendation in the *Review of Four FISA Applications and Other Aspects of the FBI's Crossfire Hurricane Investigation*, the FBI has continued to work to develop enhancements to an information technology system that assists employees in fulfilling appropriate mandates for the management and administration of CHSes. In the previous reporting period, the FBI released the *General Purpose Insert* form, which allows CHS handlers to document information that does not fit easily within other forms. During the current reporting period, as in several previous reporting periods, the FBI has continued its work to finalize requirements and develop enhancements to the Source Opening Communication, CHS Quarterly Supervisory Source Report, and the CHS Contact Report, consistent with the recommendation of the Office of the Inspector General. It is anticipated that this work will continue in the near-term.

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(U) This letter constitutes the Government's tenth 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 that reads "Kevin O'Connor". The signature is written in a cursive style with a large initial "K" and "O".

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

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