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U.S. Department of Justice

National Security Division

U.S. FOREIGN
INTELLIGENCE
SURVEILLANCE COURT

2022 AUG 29 PM 1:30

Washington, D.C. 20530

MARCO PETERSON
CLERK OF COURT

August 29, 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 May 31, 2022.¹

(U) As explained previously, the FBI is continuing to work towards transitioning the FISA processes currently handled in a platform called the FISA Management System (FISAMS) into a system colloquially known as "the Bridge." During the previous reporting period, among other activities, the Bridge team deployed and tested the production network configuration successfully, validated key network paths, deployed the Bridge to a key pre-production environment, performed an initial full end-to-end validation of the product, and deployed key forms for testing, as well as developing and deploying for testing certain workflow processes. During the current reporting period, the team initiated and supported the formal headquarters and field office user testing phase in a specific pre-production environment. This phase was initiated with a week of structured user testing, performed by non-Bridge team members of the National Security Branch, formal product demonstrations to a key stakeholder, and will continue into the fall with testing by a different set of field office users every other week. The team also

¹ (U) Letter from Kevin O'Connor, Chief, Oversight Section to the Honorable Rudolph Contreras (May 31, 2022).

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developed and deployed the Sentinel serialization user interface for unclassified testing. This interface will be used to serialize final FISA requests directly to Sentinel from within the Bridge. The team also developed and deployed for testing the Pen Register Trap and Trace renewal process. Before the end of 2022, the FBI plans to integrate FISA processes for emergency FISA requests and develop and deploy for testing a certain key serialization process.

(U) As discussed in previous letters, the FBI has also been working on technological improvements related to its accuracy procedures, also known as the Woods Procedures, which will ultimately be integrated with the Bridge. The goal of these efforts has been to use Sentinel to streamline certain processes used by FBI personnel to create accuracy subfiles and ensure the contents thereof are available in a manner consistent with the FBI's FISA minimization procedures. As noted in previous updates, the FBI has completed the Electronic Woods Capability (EWC) in Sentinel that interfaces with the Bridge and allows FBI personnel to export an accuracy subfile, which can be downloaded and transmitted to other personnel involved in the FISA process. Following successful testing, in or about July 2021, the EWC was deployed enterprise wide in alignment with the transition the FBI made to require electronic FISA accuracy subfiles, where permissible. Tutorials and training were provided to FBI personnel to explain the tool's purpose and capabilities. Since the EWC provides for the secure and on-demand creation of a certified document package for review by the Department of Justice (DOJ), 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, and no near-term development activities are planned. Instead, the team remains focused on addressing maintenance issues that arise during the course of the tool's operation.

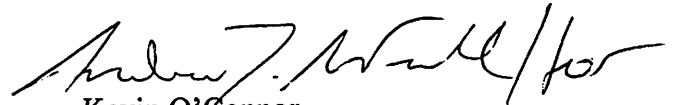
(U) Finally, consistent with an Office of the Inspector General recommendation in the *Review of Four FISA Applications and Other Aspects of the FBI's Crossfire Hurricane Investigation*, the FBI has continued to work to develop enhancements to an information technology system that assists employees in fulfilling appropriate mandates for the management and administration of Confidential Human Sources (CHS). In the 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. During the current reporting period, this work has continued, but the FBI has also deployed the Disclosure of CHS Identity Form to production.

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(U) This letter constitutes the Government's eleventh 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" with a stylized flourish at the end.

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

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