

## Summary of Section 215 Violations and Notice

Date disclosed to FISC	How/when disclosed	Description
1/26/09	Spot check	December 10 to January 23, analysts conduct 280 non-RAS identifiers
2/26/09	ETE, disclosed to DNI, DOJ 2/19/09	Analytical tool (incl 12333 data) could query BR database using non-RAS approved identifiers
2/26/09	ETE, disclosed to NSD (but not DNI?) 2/19/09	3 additional analysts with non RAS-approved queries
3/4/09	12/15/08	Identifiers added to station list w/o NSA OGC review
5/8/09	ETE	Data Integrity Analysts identifying identifiers “not associated with specific users” and sharing throughout NSA
5/28/09 (in hearing, not written notice)	Discussion bt NSA and telecom	One telecom provider had also provided foreign data
6/15/09	ETE	Analysts query metadata w/non-RAS approved identifier if it is “related to” a RAS approved one
6/16/09	ETE	available to CIA, FBI, NCTC via NSA database
6/26/09	ETE	Use of USSID 18 instead of more restrictive BR minimization,
6/29/09		Domestic identifiers added to RAS w/o NSA OGC review
6/29/09	ETE	Unmin USP [redacted]
8/4/09	Beta testing of software tool	Addition of fourth hop through kluge that had been available in earlier versions
? (possibly ETE report August 31)	?	Software developers for the next generation GUI had queried BR data to test it; they also have maintenance responsibilities for current generation (making it likely they’re contractors)
9/21/09, 9/23/09 (oral, not written, notification)	?	NSA analysts emailing BR data to other NSA analysts
?	ETE	Database of field contents storing queries accessible, never audited (accessible to Data Integrity Analysts). Also, system crash