

Critical Infrastructure and Security Sensitive Information



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What is CSSI?

PCII & SSI

- **Protected Critical Infrastructure Information (PCII)** – information that is not customarily in the public domain and is related to the security of critical infrastructure or protected systems
- **Security Sensitive Information (SSI)** – information that if released publically, would be detrimental to transportation security



Why We All Need To Care

September 10, 2001



Why We All Need To Care

September 11, 2001

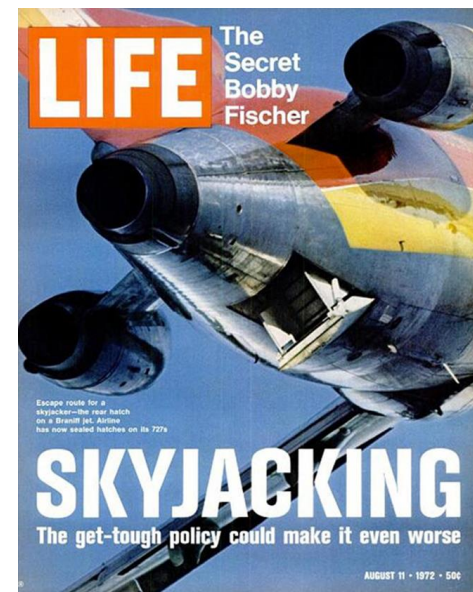


Why We All Need To Care

- **September 11, 2001 and the collapse of the World Trade Towers was a direct result of architectural and engineering plans available to the general public**
- **With this information, terrorists pinpointed the vulnerability of the building's design and made targeting the weakness a possibility and ultimately a reality.**

Historical Perspective

- SSI was developed as part of the *Air Transportation Security Act of 1974*
 - Required FAA to establish regulations for sharing SSI with airlines and airports
 - Direct response to the hijackings in the early 1970s
- SSI and PCII were applied to all modes of transportation after 9/11



Based on Federal Law

SSI

- Protected by Federal Regulations 49 C.F.R. Parts 15, 1520, 1580
- Protects security sensitive information related to transportation security
- Unauthorized SSI disclosure may result in civil penalty

PCII

- The Protected Critical Information Act of 2002
- Protects private sector infrastructure information voluntarily shared with government
- PCII cannot be disclosed through a Freedom of Information Act (FOIA) request or in civil litigation

Who decides what is protected?

SSI

- Transportation security stakeholders determine what is SSI using regulations and guidelines
- Must mark as SSI

PCII

- Submit to Department of Homeland Security
- Information is protected once validated and marked



Who can access PCII?

SSI

- “Covered persons”: transportation officials and employees with a need to know, contractors, and stakeholders such as cities who have an identified need to know



PCII

- “Covered persons”: authorized and trained individuals with direct need to know, including transportation officials and employees and contractors

Responsibilities of Those Covered

SSI

- Must have appropriate understanding and awareness and have “need”
- Must safeguard SSI
 - Lock it up and ensure it is secure when not in use. This includes going to lunch, end of day, etc.

PCII

- Must be authorized and trained in the proper handling and safeguarding
- Must have homeland security responsibility
- Must sign a non-disclosure agreement

RTD Today

- **103.4 million** annual boardings
- **339,300** average weekday boardings
 - **1,634** rolling stock vehicles
 - **1,201** buses
 - **172** light rail vehicles
 - **66** commuter rail cars
 - **323** Access-a-Ride vehicles
- **137** scheduled routes
- **9,751** bus stops
- **48** light rail track miles
- **74** Park-n-Rides
- Over **2,734** employees
- FasTracks
 - **93.4** miles of commuter rail
 - **28.2** miles of light rail
 - **18** miles of bus rapid transit
 - **21,000** parking spaces
 - Denver Union Station
 - Denver International Airport Station
 - More than **\$5 billion** in projects currently under construction



Policy Impact on RTD

Departments affected by SSI and PCII Policy:

- Safety and Security
- Information Governance
- Legal
- Capital Programs/Engineering
- Operations and Maintenance
- Planning
- Communications
- ***ALL DEPARTMENTS!***

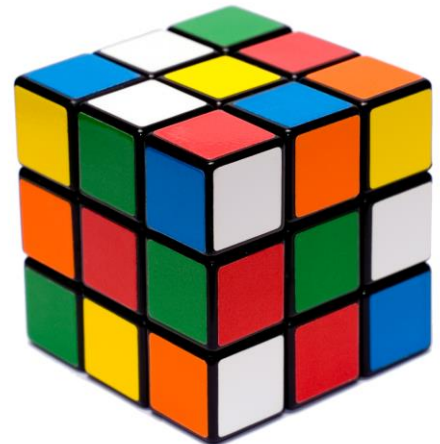
Others indirectly or directly affected by SSI and PCII Policy outside RTD:

- Contractors
- Stakeholders – Municipalities, Cities, County and State
- CDOT
- Chambers of Commerce
- Public Action Groups
- ***EVERYONE!***



Key Challenges to Implementing An Effective CSSI Policy

- Identifying those responsible for developing and implementing the policy
- Identifying affected divisions, departments and 3rd parties
- Developing training and educated staff on the need and importance of protecting the information
- Implementing an broad policy that affects ALL of RTD



Keys to a Successful Policy

- Identifying the keeper of the policy
- Developing a standing committee whose membership is from all departments led by safety and security with the authority to act, implement, and improve, enshrined within the policy
- Education through online training and handouts
- Getting buy-in and having staff take ownership



Questions?

