

Comment of John Q Public

**re Federal Communications Commission FCC 15-19
SECOND FURTHER NOTICE OF PROPOSED RULEMAKING
AND SEVENTH FURTHER NOTICE OF PROPOSED RULEMAKING
Adopted and Released on February 11, 2015**

**Promoting Diversification of Ownership in the Broadcasting Services
Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure,
Amendment of CORES Registration System**

MB Docket No. 07-294

MD Docket No. 10-234

If I understand correctly, the FCC proposes to use only the last four digits of a person's social security number rather than the full SSN (see paragraph 20), so that he or she may obtain (in lieu of an FRN or SUFRN) a RUFNR.

However, requiring a person to submit his or her date of birth plus these four digits to obtain a RUFNR calls for personally identifiable information that increases rather than decreases or eliminates privacy concerns.

Those privacy concerns are obviously shared by the significant number of persons who to date have obtained SUFRNs while declining to provide the FCC with their SSNs.

SSNs were not created or intended to be used (nor should they be used) as citizen identification numbers. The FCC has no need-to-know part or all of anyone's SSN, nor anyone's birthday (does the FCC plan to send out cards and gifts to everyone?).

A much simpler solution instead would be to continue using SUFRNs, rather than, as proposed, to eliminate them and to require submission of both a person's date of birth and the crucial four digits of his or her SSN (neither of which is currently required).

Paragraph 7 explains that: "An individual does not submit an SSN, or any other identifying information, to the Commission when he or she generates a SUFRN, and SUFRNs are not stored within CORES."

I suspect there is no insurmountable difficulty in storing SUFRNs in CORES. Thus, I suggest that the Commission's needs could be met, and privacy concerns could be better addressed, by simply allowing continued use of SUFRNs (with each person limited to having only one such number) and storing those SUFRNs within CORES.