



## ***SOCIAL SECURITY ON THE WEB***

### ***The Case of the Online PEBES***

#### ***Prologue***

On Monday morning, April 7, 1997, John Erwin, program manager for the Social Security Administration's Electronic Services Delivery Steering Team, strode off the elevator toward his office at the agency's computer center headquarters in Baltimore. Walking briskly by the long row of filing cabinets along the perimeter, Erwin noticed Monday's *USA Today* folded face down, already read. At his desk, Erwin was puzzled to find fifteen voicemails waiting. "Well, this is an interesting start to a Monday," he said to himself. As he listened to the first, Erwin's eye fell back upon the newspaper lying folded across the room. "You need to know," the caller said, "there's an article that is probably going to make your life interesting."

"When they saw a *USA Today* headline that said, 'Your social security records are online,' it touched a nerve," recalled John T. Sabo, leader of the Electronic Services Delivery Steering Team. "Their view was the records are sitting there waiting to be plucked off by anybody. They weren't, of course."

That evening, local television news carried the story, and by the next day, Tuesday, it had its "legs": the front pages of the *Washington Post* and the *New York Times*. Then the evening news on all four networks. Wednesday morning, the network talk shows. "Charlie Gibson came on *Good Morning America* and said, "Well, Joan could get mine!"

It reminded Erwin of the great Yellowstone fire. "The Park Service finally threw up its hands and said, 'Folks, this will stop when the snows come. Human man cannot stop this fire.' Well, this was a fire that was not going to go out until it was deprived of fuel."

Acting Social Security Commissioner John J. Callahan felt he had few good options: either take down the online PEBES service, or risk losing the whole Social Security website. Americans were worried about their records. The press was hammering the Social Security Administration. Congress was preparing emergency legislation directing the agency never again to do business on the Internet. On Thursday, April 10, Callahan ordered the online PEBES service suspended. “‘Take it down,’ he said, and we did,” recalled Erwin.

A year later, Kathy Adams, Assistant Deputy Commissioner for Systems, reflected. “I hope what we don’t do is say, ‘Gee this was a painful experience, it hurts when I put my arm up, I’m not going to put it up any more.’ Unfortunately, in government, forces push you in that direction. It’s easier to leave it down than to bring it back up. Because as long as you don’t bring it back up, GAO won’t do a report. As long as you don’t bring it back up, you’re not making *USA Today* and you’re not getting letters from Congressmen. But as long as you don’t bring it back up, you’re not providing services that you need to provide. But who’s the advocate out there asking to do that?”

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## **Background**

On August 14, 1935, President Franklin Roosevelt signed the Social Security Act, creating a national social insurance program to pay infirm and retired workers a continuing income. Within the year, the United States Social Security Administration (SSA) had issued Americans their first Social Security numbers and cards, requiring name, date of birth, place of birth, and parents’ names on their applications.

Today, SSA operates 1,300 field offices, and provides services to 150 million American workers, including 48 million beneficiaries. By the year 2020, SSA expects the number of beneficiaries to increase to 73 million beneficiaries.

## **The Personal Earnings and Benefits Estimate Statement (PEBES)**

As the nation entered the 1970’s and the computer age, Congress took steps to open government records to legitimate public scrutiny, but also to protect the privacy of Americans. The Freedom of Information Act, for example, firmly established the citizen’s right to have access to public records. The Privacy Act, in counterpoint, enumerated a set of “fair information” principles that gave Americans the right to have access to their *own* records, limited disclosure of their personal data by the government to third parties, and placed restrictions on the government’s right to collect personal information.

Further Congressional action directed SSA to make available to any American worker who requested it the agency's records of the worker's lifetime earnings, and SSA's computation of the worker's likely benefits upon retirement.

To address this requirement, SSA created a report called the Personal Earnings and Benefits Estimate Statement, or PEBES (rhymes with *webs*). In 1988, SSA received its first application for the PEBES report. The application required a worker to provide his name, Social Security number, and date of birth. Using these identifiers, SSA searched its records. If it found one that matched, SSA created the PEBES report and mailed it, within a matter of weeks, to the person making the request, at the return address indicated.

SSA presumed the person requesting the PEBES was in fact the account "owner," and so was entitled to receive the PEBES report. But SSA made no attempt to verify this – to *authenticate* the identity of the person making the request -- whether to verify the applicant's signature against a signature card (SSA has never kept signature files), or to verify the address given against a previously authenticated address (SSA has never kept address files for non-beneficiaries.) If SSA found a record using the identifiers contained in the PEBES application, SSA assumed that the request was legitimate, that the requester was the account owner and entitled to receive the data, and shipped the report.

### **Customer Service Over SSA's Toll-Free Line**

The PEBES report became popular with American workers, with SSA itself, and with Congress.

For workers, the PEBES was attractive in two ways. First, it contained a summary of a worker's lifetime earnings as reported to the IRS on W-2s (data which the IRS in turn provided to SSA). With this information, a worker and her family could verify the accuracy of SSA's record of her taxable earnings and Social Security contributions to date. Second, the PEBES projected a worker's future Social Security benefits, based on her account, which helped her and her family plan for retirement. (See Appendix A, *Jane Q. Public's PEBES Report*)

The popularity of PEBES moved it to center stage in SSA's customer service plan. Not only did SSA's PEBES service build customer good will, but it helped to educate Americans about retirement generally, and about the role of Social Security benefits in particular. Kathy Adams observed:

Social Security has always been based on what we call the three-legged stool – private pensions, savings, and then Social Security. If we really want to view our mission as keeping people above the poverty line, you can't just get to the end of your work life and think you're going to live off Social Security. So one of our core missions is to inform the public of what

their retirement benefits are going to be. If we can do that at as young an age as possible, that makes better sense for such an important planning tool. We want to encourage people to plan their retirement portfolios, and the PEBES is key to that.

In 1989, SSA began to accept requests for the PEBES application by telephone over its new toll-free lines. This made it easier and faster for workers to acquire the PEBES application. But even with the toll-free access to applications, the basic PEBES business process remained unchanged. Once SSA's operator took the request for the application by phone, the entire process – as before -- was managed through the mails. The customer received the application by mail, returned it by mail to SSA's processing center in Wilkes Barre, Pennsylvania, and within 2-4 weeks, received his PEBES by mail at the address indicated in the application.

The new PEBES request channel proved effective. By the mid-1990's, 3.5 million workers a year were requesting their PEBES, whether having phoned, written or visited an SSA field office in person for the application.

Seeing the value of the PEBES report, Congress directed SSA to begin mailing the PEBES *automatically* -- even with no request -- to all Americans 60 or older. For this purpose, the IRS began to make available to SSA its records of taxpayers' addresses, gleaned from the most recently filed returns. (IRS prohibits SSA from using the addresses for any purpose other than the PEBES, or even from keeping the addresses on file.)

In 1995, the first year of this mandate, SSA mailed 70 million PEBES. By the year 2000, the law requires SSA to mail the PEBES automatically to *all workers 25 or older* -- a total of 123 million PEBES mailed annually.

## **SSA on the Web**

In March, 1994, SSA opened its web site, one of the first federal agencies to do so (<http://www.ssa.gov>). John T. Sabo, who led the agency's principal Internet development projects through the 1990s, recalled being "blown away" when, in 1993, he saw the "web concept" for the first time. The IRS had just started to put forms and publications on the web – "nothing transaction-based," Sabo observed, "just downloading files and documents, nothing special about it." But it set him thinking. "This was the future, and it was important that we get our feet wet."

Working over the Christmas holiday in 1993, Sabo – who taught himself HTML and other programming skills – produced a basic SSA home page. In March, 1994, SSA went online with its home page and web site.

SSA's site caught the wave of the Internet explosion. In its first year, it welcomed 10,000 unique users. In FY98, SSA projects about 3.5 million unique visitors. Its web servers now permit 1,000 simultaneous visits and access by 2.8 million people over a 24 hour period. (Even now, interest in SSA's site grows by the month. Figures for March, 1998, show that 350,000 users visited, an increase of 9% over February.)

### **NPR, SSA Workloads, and the Rush to the Net**

By the mid-1990s, a congruence of politics, technology and workloads pushed SSA to investigate the Internet as a new distribution channel for information and services to its customers.

The White House-sponsored National Performance Review was pressing agencies to work "faster, smarter and cheaper," and to find ways to use the "Information Super Highway" wherever possible. America's Internet use was in fact booming, and spreading across segments of society. The "demographic uptake curve" for the technology seemed to be accelerating, John Sabo recalled, moving the Internet out of the homes and offices of the technology elite into libraries, schools, and the nation's lower income strata.

The Internet's potential value seemed high to SSA strategists. The agency completed no formal business case to migrate its services to the Internet. But its efficiencies, John Sabo recalled, were obvious to all: "pennies per transaction vs. dollars." As a development initiative, Kathy Adams explained, migration to the Internet "was a no-brainer." Start up costs looked low, and SSA was "itching to look for Internet applications" to train staff on linking data from the Internet to the mainframes. Even if its first efforts might fall short, this would be no "throw-away code," but infrastructure software that SSA could use time and again.

### **Self-Service on the Internet**

This was all especially intriguing to SSA strategists, for a compelling reason: SSA workload was increasing, but its staff was not. SSA analysts and actuaries advised that this gap between the demand for service and service supply would likely grow wider in the next two decades. John Erwin, a member of the team that developed the PEBES and other Internet applications, shared the analysis:

We know what is coming: the baby boomer population. It is going to hit SSA and hit it hard about the year 2002. First, with disability, meaning that part of the workforce that at the age of 58, 59 will have reached the age of disability where that back pain now limits their ability to drive that 18-wheeler. They're going to come in increasing numbers to our door ready to receive their benefits. The crucial load is going to hit about 2010. At that

point we're going to be looking at workloads that are 22-28% higher than they are right now. We are not expecting our staffing to change. How do you do 28% more work with the same staff? You have to find a way to offload that work, and get the public to help themselves.

SSA had already "offloaded" work through automation – some SSA processes were so automated as to be "in the 99<sup>th</sup> percentile of automation," according to Erwin. "What we've been doing in this agency for last five to ten years," Kathy Adams added, "is substituting IT for human capital. We have had increasing workloads, and we had decreasing staff. And we've been making that 'delta' up by giving our people information technology."

There were still some productivity gains to go. But "strategically," she warned, SSA was at a crossroads. "If we have to serve people only in our offices, or only over the 800 number, we are not going to have enough people to provide quality service." (Indeed, SSA's toll-free performance had raised the agency's service standards – and its customers' expectations. "We wanted to compete with L.L. Bean, not just with IRS," Adams observed, "and to be as good as the service our customers get anywhere else.")

Having already offloaded work through automation, the next stage was to offload work to self-service. "Look," Adams said, "from a political standpoint, it's not easy for us to close offices. So if we're going to break through the next big productivity improvement, we're going to have to give IT capability to the public." The difference – the "delta," as Adams called it – in the gap between SSA's increasing workload and declining staffs would have to be filled by self-service. Every PEBES that SSA provided via self-service over the Internet would be one less PEBES for SSA to service by mail or other means. "That, to me," she said, "is called survival."

The Internet struck Adams as ready-made for self-service. "That concept," she said, "is people who can access their own information, whenever and from wherever they want, so that we don't have to do that work." As a self-service distribution channel, the Internet created the possibility of providing fast service to those who required it, and by taking self-servers off the main queue, reasonable service levels for those who preferred in-person or phone contacts with SSA. In any event, Adams observed, "we've got more than enough work to go around."

### **The PEBES Moves Towards the Internet**

In 1994, SSA began investigating ways to put the PEBES and other applications on the Internet. It formed an Electronic Services Delivery Steering Team headed by Sabo, and entered into partnership with CommerceNet, a federally-sponsored public/private Internet consortium formed to build a world of secure Internet services. SSA's and the ESD team's Internet knowledge capital built up rapidly as they gained access to leading-

edge security technologies, “best-in-class” industry leaders, and important opportunities for controlled testing with CommerceNet partners.

With the SSA homepage and website up and running, and CommerceNet as a credible partner, Sabo was emboldened to propose the next step to his superiors. “You know,” he said to Larry Thompson, Principal Deputy Commissioner at the time, “you could request your PEBES on the Internet, and we could do online transactions, and working with the consortium we could figure out the security.” Thompson, Sabo recalled, talked later with the director of Office of Systems, Renny DiPentima. “If IRS can do this, why can’t we?” Thompson asked. That fall, Sabo said, DiPentima gave his staff their direction. “Let’s develop the online transaction with the PEBES.”

### **Build No Path...**

“Sitting over there in the woods,” John Erwin gestured out his window on Security Boulevard in Baltimore, “is a computer center with about 10 trillion bites of online information. Eight extremely large mainframes, running 27 major programs real time, averaging 700 transactions a second – and that’s just from our own employees. Your entire life history is over there, online – meaning it’s not even sitting on tape files anymore, it’s all sitting on a DASD [direct access disk storage], huge spinning disk systems.”

Until its encounter with the Internet, SSA operated its data resources – its network, terminals, PCs – on an entirely closed network. There was no external access – not even dial-in access. “The network,” Erwin observed, “was completely closed to the American public.”

DiPentima got his message across to Erwin. “He sat me down and said, ‘Alright, John. We’re going to start to support this thing that Sabo’s kicked off. But I’m going to give you one rule. Don’t you ever let anyone into our data center. Ever. Don’t come here building a path for someone to get access to our data center.’”

### **Privacy and Security Take Center Stage**

The requirement was not trivial. Federal law – the Privacy Act of 1974 – as well as OMB regulations required strict adherence to standards of both privacy and security. The Act read, in part:

“Each agency that establishes a system of records must ... establish appropriate administrative, technical and physical safeguards to ensure the security and confidentiality of records and to protect against any anticipated threats or hazards to their security or integrity which could result in

substantial harm, embarrassment, inconvenience or unfairness to any individual on whom information is maintained.”

As word circulated that the PEBES was moving towards some sort of online presence, Darrell Blevins, SSA’s Privacy Officer, grew concerned. Blevins oversaw the confidentiality of SSA’s records, and advised on policies that guided the agency on sharing information, and protecting it. His mission was to make sure that SSA provided its legitimate customers with access to their own data, while restricting it from others, including preventing wrongful, secondary use by third parties.

Blevins knew the established risks and requirements of SSA’s current operations well. Government agencies often requested SSA data to make benefits determinations, which was acceptable. But private firms were another matter. An insurance company, for example, might like to learn whether a beneficiary was getting disability benefits. For SSA to release this information required the beneficiary’s consent. After all, it was a central tenet of privacy policy and law that an agency should not collect personal information for one reason and then use it for another, except with the consent of the record subject.

Looking to the Internet as a distribution channel, Blevins’s principal issue was control of the data. Up until now, the PEBES channel had been limited to mailed-in or phoned-in requests, and mailed-back replies. In that scenario, Blevins felt he had the current data set – and the potential abusers of secondary uses, like the insurance industry – under good control.

Before the Internet, anyone wanting access to personal data in our files had to use processes, like the 800 number, that basically were limited to giving one record at a time, which is an inherent protection against anyone bent on mass fraud. Or, they would have to go through a closely watched process to obtain bulk data from our mainframe computers

Blevins was not so sure about the Internet.

“The Internet was a really scary idea for those of us in the privacy area,” Blevins said. It felt more like a place for lurking pornographers, hackers, and kooks than a place to do the government’s business. Blevins admitted that he, like many in government at the time, actually had very limited knowledge of the Internet. But he did know that the SSA website had only been used for giving out general kinds of information – how to find SSA field offices, what the benefit increases would be for this year. “Nothing personal, nothing sensitive,” Blevins said. As for the Internet’s untested potential for *transactions*, Blevins said, “we were terrified of it as a vehicle to transmit personal information.”

The momentum of developments only increased Blevins’s concern.

The Electronic Services Delivery Steering Team, led by Sabo, bristled with entrepreneurial enthusiasm as it investigated a range of online services for the future. Representatives of the different organizations within SSA – policy, privacy, systems security, networking, applications, general counsel – a group of about a dozen, gelled quickly. Bill Pennington, in charge of developing secure systems for the project, recalled the time:

It was really surprising for a large organization, everyone involved had the same goal. We were all really focused. Everybody was on board with this. We didn't have to convince anybody. Everybody's main purpose was to put services out to the public, something that was useful, that people could use, that could benefit them.

Concerned, Blevins took two steps to clarify the risk of Internet operations and manage it.

First, he urged an incremental approach, and prevailed. SSA would phase in its Internet PEBES. In the first phase, SSA would allow its customers to request the PEBES online via the Internet, and return the PEBES by mail to the address designated by the requester. If things went well, SSA would next take requests online for the PEBES *and provide immediate, online return* – a transaction completed entirely “in-band” over the Internet. Eventually, in a third phase, SSA might let people change certain information in their records – such as their addresses.

Second, to fully understand the risks of this new territory, Blevins sought an independent set of opinions from Los Alamos National Laboratories (LANL) systems security specialists. A LANL team had done previous work for SSA in evaluating its kiosk operations. Blevins felt strongly that LANL should study how SSA might use the Internet to transmit personal data, tell SSA what the risks might be, and advise SSA on solutions to consider.

By early 1995, Blevins felt reassured. The LANL risk assessment was underway, and SSA was committed to “a measured incremental kind of approach where we could take a step and see what happens, let some time go by, try to assess it, take another step.”

“We did it that way because of the privacy issue,” Kathy Adams recalled. “We didn't want to send data back over the Internet until we had the report from Los Alamos, until we felt we had a clean bill of health.”

### **The Los Alamos Report**

In July, 1995, the Los Alamos team provided its report. The gist of it, as Blevins remembered, was this:

You cannot consider that this is anything like you've done before. The Internet magnifies everything. There are new and emerging threats that come along, so whatever it is now you can't consider that that's locked into place. You need a suite of security solutions. You can't do one thing and think that's going to work. You have to keep on top of it because whatever you do today, you can't expect it will work a month from now, let alone a year from now. So you must keep constantly monitoring it.

The LANL report considered three principal concerns:

- The *risk of interception of data* – and its unlawful diversion to a third party, or changing of the data's content
- The *risk of penetration to other SSA systems* through the agency's web servers, with the attacker changing SSA's records, or downloading personal data in volume; and,
- *Authentication*, knowing that the person on the other end of the transmission is who they say they are, with the risk that someone could pretend to be someone else and wrongfully acquire a PEBES record

### **Interception: Encryption**

To address the risk of interception and assure the confidentiality of data, SSA had planned to take advantage of Netscape's recent introduction of the Secure Socket Layer protocol for encryption. LANL confirmed this direction for SSA, and validated SSA's plan to use SSL to encrypt all its Internet messaging.

### **Penetration: Firewalls, Systems Design and Monitoring**

To protect against the risk of penetration, Bill Pennington's team designed and built a series of firewalls which secured the PEBES server from SSA's main systems, and limited access to SSA systems from the Internet. Internet users would actually interact with the PEBES server, secured by the firewall. The server, in turn, would interact with one of the eight mainframe systems behind it (SSA maintains its records in these multiple systems, rather than on a single hard disk or drive system; no single copy of the database actually exists.) The language each spoke was different, so that Internet requests could not be understood by the background systems, except with translation by the PEBES server. Upon an Internet request for a PEBES record, the PEBES server would perform a one-by-one construction of the query and go out to the different data bases to pull the information together to respond.

In independent tests conducted by a private third-party “Tiger” team, Pennington’s security measures repelled the attacks, even with system codes in the team’s hands.

To further guard against the possibility of massive downloads of SSA data, SSA added monitoring software which scanned for unnatural patterns of activity and multiple requests for the PEBES. John Sabo was especially concerned with the problem posed by system “velocity”— a unique feature of the high speed transaction world in which the PEBES would operate. With SSA’s highly automated systems processing thousands of online PEBES requests per hour, Sabo was concerned that fraudulent PEBES requests – perhaps in bulk – might slip in among the mass of legitimate request activity, be returned, and cause SSA to compromise one or many customers’ privacy. Rather than slow the systems down to examine each claim, SSA added software tools to help pick out disturbing patterns of requests, such as many different requests coming from a single address.

With encryption, firewalls, and monitoring, SSA was satisfied that its first stage plan to permit online requests of the PEBES provided adequate security and addressed the issues of interception and penetration.

Sabo’s team used LANL’s recommendations to augment the design of the SSA Internet systems. They remain, Sabo stated, “at the core of our systems today.” SSA planned to conduct a test of the first phase -- online request for PEBES with a mailed-back report -- beginning in March, 1996.

## **Authentication**

*“Is this the party to whom I am speaking?”* asked Lily Tomlin’s daft telephone operator. But authentication was an entirely serious matter. The Privacy Act and customer confidence in SSA required SSA to give its legitimate customers access to their records while denying it to pretenders. Authenticating the identity of the online PEBES requesters – making sure the person requesting the record was in fact the customer whose record it was – was a substantial privacy challenge.

As it considered the environment of the Internet, LANL advised SSA of potential risks. Even if SSA used the Internet for online requests but returned the PEBES in a slower “out-of-band” distribution channel such as the mails, the Internet still gave a fraudulent requester immediate feedback on the validity of the identifiers she might offer. If she got it wrong, she would know it, though she might not know why. She could persist, slightly change her identifiers, and resubmit immediately with a hope of gaining access. (Eventually, as SSA designed its system, she would bounce: the system allowed a user five unsuccessful attempts to pass authentication before locking her out for 24 hours.)

The risk increased with a fully online version, in which both the request for the PEBES and the return would be made “in band” over the Internet. If SSA computers accepted the online request, they would return the PEBES report immediately online (through the web, not via Email) to what were essentially anonymous delivery points. There was no U.S. mail to slow things down – time that could be used to scan for, detect, and halt fraudulent requests and prevent wrongful returns, or to find and trap fraudsters.

What, then, should SSA do to deal with the challenge of authentication posed by the special risks of transactions on the Internet?

### **Past Practice**

For years, SSA had required knowledge-based authentication for PEBES requests, using identifiers that the customer uniquely knew -- a Social Security number, date of birth, and name.<sup>1</sup> If the customer could provide these three identifiers, the only test SSA applied before returning the PEBES was whether SSA had a record that matched the identifiers. If SSA did, it ran the report, and shipped the PEBES to the address provided by the requester. SSA made no effort to verify the actual identity of the requester, whether by validating signatures on applications, or addresses, or other means.

As it planned its migration to the first phase of its online PEBES service, SSA proposed to address Internet risks by requiring two additional identifiers from its applicants: place of birth, and mother’s maiden name. Together with name, date of birth, and Social Security number, SSA would require customers to input five knowledge-based elements to authenticate their online requests.

Taken together, these five identifiers constituted a “shared secret” that SSA believed only it and the requester knew. The shared secret was based on data that SSA collected from the worker’s original application when it issued his Social Security card number. Even if over time some of these identifiers had become ubiquitously available, it was SSA’s view that it would still take a determined effort for someone who sought wrongful access to a PEBES to get all of them.

### **The Value of the Data: The Test of Proportionality**

And who would make such a determined effort? The value of the data – a person’s lifetime earnings report and future Social Security benefits – was low enough that perhaps few would bother. Moreover, the worst harm that might befall a legitimate customer seemed remote: an estranged spouse who wrongfully secured the customer’s record for a

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<sup>1</sup> Typically, authentication can be achieved by one of three means: biometrics (fingerprints, voice, iris), possessions (birth certificates, passports, keys), or knowledge (mother’s maiden name, PIN numbers.)

divorce proceeding; or an employer who gained information about an employee for salary negotiations; or a landlord who learned that a tenant could afford more rent.

At worst, an occasional horror story seemed possible. But collectively, the tales told didn't add up to a great harm done. The principle of proportionality which pertained was clearly stated in OMB Circular A-130, as interpreted by Sally Katzen, Director of the Office of Information and Regulatory Affairs for the United States Office of Management and Budget, to a privacy forum:

OMB Circular A-130 gives guidance about adequate security, and it is actually relatively simple. When the program manager who owns the information on a computer system thinks about adequate security, he or she should think about the kinds of security measures that are really required. Because security measures under the law are to be "commensurate with the risk and multitude of harm that might result from the loss, misuse, unauthorized access to or modification of the information in the system." In short, or in plain English, one size does not fit all. And one should look at the kind of information requested, the kind of information on the system, before taking action.<sup>2</sup>

### **Risk and the Mails**

The fact was, however, that SSA had no true picture of the risk posed by its mail distribution channel. In nine years of mailing the PEBES reports, SSA had never once validated an address to which it sent the report. It maintained no address files on Americans. "Why should we?" asked John Erwin. "Why do we really care where you live? If you're not getting benefits from us, we don't need to know where you live. Why do we want to spend all that money keeping track of a person that's not going to show up on our doorstep for another 30 years?"

For that matter, SSA had no indication that its mailed PEBES had ever systematically gone awry. In six years as Privacy Officer, Darrell Blevins could recall only two complaints that the PEBES report had been mailed to the wrong person. If SSA staff thought the American public's trust in the U.S. mail wasn't entirely grounded in reality – after all, as Erwin said, "The U.S. Postal service will deliver mail to anyone, at any address" – people at least trusted the mails. And that was good enough for SSA.

Indeed, SSA had been mailing back the PEBES reports for years. In its first phase test of Internet operations, when SSA migrated to online PEBES requests with mailed-back reports, SSA proposed to use exactly the same mail-back distribution channel as before.

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<sup>2</sup> United States Social Security Administration. *Proceedings, Privacy and Customer Service in the Electronic Age*. Privacy Forum Number Six. Washington, DC: June 9, 1997.

With its online *request* systems secured by encryption, firewalls and monitoring, and the *distribution* channel the same as before, the risks looked well-managed. To be on the safe side, SSA had added identifiers, increasing the authentication safeguards. With this, SSA was satisfied that the first phase test of PEBES online (called “Batch PEBES” because SSA would batch-run the received PEBES applications for return by mail) was at least as secure as its current practice.

### **Tougher Authentication for a Riskier Band?**

But what about when SSA fully migrated the PEBES to the Internet in its second phase? In that phase, SSA planned to accept requests and return PEBES reports *entirely “in-band” over the Internet* – providing direct, near-instantaneous reply to the requester. That seemed to increase risk of abuse and fraud.

Even as the online test of “Batch” PEBES moved towards its March start date, SSA was considering additional options to mitigate Internet risk with stronger authentication. “One of the things we tried to do was to view this in traditional risk management terms,” Sabo recalled. “What are the appropriate controls for the sensitivity of the data? What are the potential harms that could happen?”

**PINS and Passwords.** One option was to provide all customers with a Personal Identification Number (PIN) or similar password. This offered a good measure of security, especially if SSA generated the PIN or password and mailed it to requesters. This would also give SSA’s customers the option of electing to participate in online access, or not.

But there were significant issues of reliability, scale and cost to be considered. In effect, a PIN program could mean issuing the equivalent of a duplicate Social Security number to the 123 million workers who would soon become the audience for the PEBES.

SSA regarded PINs and passwords as notoriously difficult and expensive to manage. People tended to lose them, forget them, or get them wrong. “You’re in a whole maintenance and servicing arena, helping people get their passwords back,” John Sabo observed. The prospect of creating a new infrastructure to manage a new set of SSA-generated identifying numbers – for a service that customers might use once a year or once every five years – was daunting.

PINs’ unreliability created a significant scaling problem for an organization managing an offering as large as SSA’s PEBES product. Even with their known fickleness, PINs could be fine on a small scale. If the PIN process had a one percent “help me, I’m lost!” rate, and SSA handled 50 transactions a day, that would be one problem to resolve every other day. But when scaled up to a huge system like SSA’s, even small error rates would reverberate like a shock wave. If SSA handled 100,000 transactions a day, a one percent error rate would translate to 1,000 problems per day. “And,” Sabo observed,

“when you’re helping people get their passwords back, you have to authenticate each and every one.”

The PIN option presented significant managerial risk, overhead costs, and operational challenges. It was set aside – and with it the possibility to “opt in” to the PEBES program with a PIN, and “opt out” if one chose not to have one’s PEBES up on the Internet.

**Public Key Cryptography.** Public key cryptography was the most secure solution possible. In general, public key cryptography uses two keys – one kept private by the user, and the other made public. Operations performed with the private key can be verified with the public key, and can provide authentication. In SSA’s case, the SSA web server could use the customer’s public key to verify, in its transactions, that SSA was talking to the party that held the private key – the legitimate customer.

As SSA considered its options, technology was not at issue: it had been available for some time. Rather the problem facing SSA in 1996-97 was operational: the requirement that it find a means to bind a customer’s identity to the public key in order to get authentication. This is usually accomplished by issuing each customer a unique digital certificate, authenticating identity at the point of issuance. SSA’s challenge was to find the means to issue digital certificates – and to authenticate identities – to the 123 million PEBES customers.

In 1996, as now, it is possible for an individual agency or firm to create its own public key infrastructure, providing public and private keys to employees, and authenticating the identities of key holders. SSA determined that, in light of its large customer base, it would be financially difficult and operationally impracticable to create its own public key infrastructure. Strategically, it would move SSA in a direction away from efforts which were then underway to build a single public key infrastructure for all Americans. Sabo related the thinking:

The problem we had when we were doing the PEBES was that in order to really exploit PKI in effect, as a practical matter, you had to develop a custom solution for handling the server side and the browser interaction for exchanging certificates. In other words, a browser could always view the certificates at the server in those days because the servers had to have certificates to enable SSL sessions. But the client side could not sign forms, for example. So the server would not be able to deal with the client certificate, unless you provided a plug in application for the client. And that’s expensive. There are companies that we could have gone to and bought from, and then give people the application to run on the client side. But then we’re in the business of supporting the infrastructure.

Rather, SSA looked to the day – in the near future, it reasonably hoped – when a general public key infrastructure – one that was not customized to the IRS, or to Social Security – would be widely available to all Americans. In 1996, the U.S. Postal Service had approached SSA with the idea that *it* should become the trusted, certifying authority for all Americans. People would present passport-level proof of identity to the Postal Service, which would in turn issue digital certificates.

But in that same year, the Postal Service pulled back from its initiative. PKI, as a basis for secure Social Security web interactions, would have to wait. John Sabo recalled the moment:

It was an important juncture, but not a juncture per se that had a particular due date. In working with the Postal Service, with its ubiquitous physical points of presence, we were jumping to a very rigorous stage of authentication – an in-person proofing consistent with what is done for passports, for all practical purposes. Although there appeared to be no other method to do in-person authentication, that didn't mean there weren't appropriate levels of authentication in between, that were quite satisfactory to the privacy community and quite satisfactory to the working citizen.

### **The Decision: Knowledge-Based Authentication**

On March 21, 1996, after security testing, SSA initiated its Batch PEBES pilot, allowing users to request a PEBES online through the agency's website, and have it mailed back to the address they provided, with a lag time of two weeks. To receive one's PEBES a worker had to provide the five identifiers online: name, Social Security number, date of birth, place of birth, and mother's maiden name.

The Batch PEBES pilot formally ran for five months, over which SSA logged 4,000 comments, the great majority approving, many requesting online *return* of the PEBES as well. The pilot was so successful SSA kept it operational another seven months, through March, 1997. Hundreds of thousands of people requested their PEBES in this manner.

Throughout the pilot period, SSA continued to develop the systems capability to handle a fully transactional, online PEBES. As the Batch PEBES pilot ended its formal test period in the fall of 1996, SSA evaluated its next move – specifically, whether to test a fully transactional online PEBES.

### **Wondering Where All That Mail Goes**

Darrell Blevins thought that the Batch PEBES pilot offered a good opportunity to finally measure the kind of fraud that might be associated with the mails, and even with the

fuller online PEBES. As Privacy Officer, it was his job to worry about these things. How many reports were requested by people under false circumstances, he wondered? SSA had never had problems with the U.S. mail, but then again, it had never gone out looking for any. Blevins requested – but to his regret, did not demand – that SSA’s Office of Program Integrity Reviews study the Batch PEBES pilot to see how many PEBES reports actually went to the right customer, and to no one else.

“This would have told us,” Blevins recounted, “what the reality of authentication was, and what the reality of the utility of the data was, and whether people were willing to commit a crime to get it, and willing to go to the length they have to find out the five authenticating elements about somebody else.”

But Blevins was rebuffed. Without addresses or phone numbers for requesters – other than those which requesters (or was it fraudsters?) had provided SSA – investigators felt any attempt to determine the truthfulness of claims would be fruitless. It was a matter of priority.

Blevins was determined to learn something from the Batch PEBES experience. He and John Sabo collaborated on an informal survey to match the names and address of people who had requested PEBES online with commercial address data bases available on CD ROM. They found only 60% of the PEBES names and addresses matched up against the commercial data base. The data seemed so unreliable, however, that Blevins concluded it was meritless. “We made an attempt to determine which cases in the 40% were in fact legitimate . But when we were done we felt it was so flawed we didn’t even want to talk about it much.”

### **The “Go” Decision**

With no information indicating that Batch PEBES access or distribution had generated any ruptures or flaws in the Batch PEBES operation, SSA decided to go forward with a limited test of the next planned phase: full online request *and* return of the PEBES over the Internet, starting in October, 1996.

The “Online” PEBES, as the full “in-band” version was known, would not just speed responses to customers via the Internet. It would allow customers to input their personal variables to the PEBES database and make iterative requests with different variables – letting customers float a series of “what if” earning scenarios to SSA to determine future benefits.

The Online PEBES would require the same five knowledge-based authentication factors as Batch PEBES. John Sabo recalled SSA’s thinking at the time:

The consensus of the experts we had, in effect, was this: your current process, where people authenticate themselves online with you using name, Social Security number, date of birth, place of birth, mother's maiden name – hundreds of thousands of people have been using this and getting their PEBES mailed to an address (which we have no prior record of) successfully for a year. The privacy community has had no problem with that. And they absolutely had awareness of it. They said, "Well, you're mailing it to a mailing address, that's fine." As long as it was being mailed somewhere, they were comfortable. And yet the authentication of the online version was identical. If it's good enough to send it to somebody through the physical mail based on these five elements, why isn't it good enough to send it electronically, provided all these other checks are in place?

### **Development of the Online PEBES**

SSA development teams were ready for the October, 1996 test. Over the summer and fall they had gone into high gear to create PEBES' online interactivity. Managed out of the Office of Systems, upwards of 40 staff had allocated some or all of their time to the project. Analysts interpreted the business process, ensuring that what the programmers developed was actually what was specified. Security analysts made sure that the security aspects of the systems were included as the Online PEBES was built. Operational experts made sure that the appropriate safeguards for the firewalls were put in place. Policy staff made sure that the policy framework under which the project was sponsored was reflected in program design.

Will Harrell, director of the Office of Systems Requirements, recalled those months:

It was a robust team. In terms of an online application in which we would provide feedback from our files – it was totally new. We had online access to information, but this was the first time we had a programmatic feedback of data from our records. We wanted to make sure we got it right. There was tremendous enthusiasm from the entire group for this process. They met at all hours, worked all hours, not because they were forced to but because they wanted to. They believed in the project, they wanted to see it done, they thought that the benefits were there. They put in a lot of time. They saw this as the future.

In October, 1996, with the Batch PEBES pilot still running smoothly, SSA began its first limited test of the fully interactive Online PEBES over the Internet, working with several public libraries, a bank, and Social Security employees with Internet access.

## **Validation**

The results of the October test were favorable. SSA knew it had a secure system. It was authenticating at the same level as Batch PEBES, which was higher than mailed-in PEBES. Now, Sabo recalled, it felt it had a system people liked as well.

We were reading and monitoring all the customer feedback we received within those test periods. We had a small number of people – probably just a few hundred users overall. They were delighted. That’s the thing that gave us a lot of confidence. The reaction of people who used the system on the web in our test site was one of total and complete satisfaction. As close to 100% as possible. They loved it, they loved the instant response....

But while SSA had its antennae up for a host of user issues with the Online PEBES, it was principally focused on the customer interface, not privacy concerns. “They were looking at it from a usability perspective,” Will Harrell remembered. “Is it something that’s easy to use, does it make sense, can I go in here and make sure the information that I provide is easy to input and results in what I was supposed to get?”

With the Batch PEBES trial under its belts, and the limited Online PEBES trial running smoothly, Sabo prepared for a March 5 launch of a national test of interactive PEBES.

The agency felt confident it had a product that Americans would love. “We relied on our own judgment about this primarily,” John Sabo said. “We did not go out to the privacy community directly and say, ‘We’re planning to do this. Let’s have your reaction to the design or assumptions.’ We have a tradition of kind of knowing how we do things and what has worked for a decade, and we take our privacy responsibilities really strongly.”

“We were focusing much more on the security and the firewall,” Kathy Adams recounted. Will Harrell shared the view. “It was not a new application. We’d been doing the PEBES for years, and providing at least the requests over the Internet, while mailing the actual document back to the address individuals gave us. We knew we had a secure system. We didn’t think we were breaking new ground.”

Darrell Blevins summed up agency thinking:

We knew we had done well in guarding against two of the three main risks: that data would be intercepted as it traveled the Internet, and that our data center could be penetrated. But the authentication problem -- how sure could we be that the person at the other end of the electronic connection was

really who he claimed to be? We knew it would have to be knowledge-based authentication. Other options were not cost effective.

The folks from Los Alamos warned us not to compare the Internet with anything we had done before. Still, we had become comfortable with a knowledge-based authentication scheme for online PEBES based on our experience with other operations. Over the past decade our agency has given the public access to its personal information through millions of paper PEBES and, literally, hundreds of millions of telephone discussions. In each of these cases we have used knowledge-based authentication and have had very few problems. It's true we didn't go looking for problems, but with this level of activity, if the problem was there we would have heard about it. The fact is, I couldn't name a dozen instances of abuse.

So we asked ourselves, how likely is it that one person will use this Internet application to impersonate another in order to get his PEBES? Keep in mind that such an impersonator would have to be willing to knowingly commit a federal crime and go to whatever trouble necessary to learn the five authenticating elements. We thought this would be so rare that the benefits of the online PEBES should not be denied the public as a consequence.

## **Operational**

SSA brought the Online PEBES quietly up onto the web for a national test March 5, 1997. It did not announce the test, lest it draw the attention of hackers. SSA's hope was to test and observe the reliability of the system in operation – the ability to sustain heavy use, with no complications or denials of service – to gauge interface issues, and to learn about customer concerns regarding privacy and security.

The Online PEBES quickly gained a buzz. “To show you how high and visible this thing became,” John Erwin recounted, “shortly after we went up, Gore's office called. They wanted us to go down to the Old Executive Office Building and start preparing for a live press conference with the Vice President, at which point he would request his PEBES online.”

Meanwhile, as the March test prospered and April brought the first spring to Baltimore, John Sabo received a call from a free lance reporter who had gotten wind of the national test.

On Monday April 7, the world turned upside down for the Social Security Administration.

### ***USA Today* Breaks “Social Insecurity”**

On Monday, April 7, the following story appeared on the front page of *USA Today*, below a headline captioned “Social Insecurity”:

“The Social Security Administration, trying to speed service and cut costs by using the Internet, inadvertently has compromised the financial privacy of tens of millions of Americans.

Social Security’s month old online service is handy for taxpayers looking for instant access to their financial records. But it also gives nosy neighbors, ex-spouses, prying relatives and just about anyone the ability to view those same files if they have some very basic information.

What could they see? How much someone earned every years, going back to 1951. How much someone will get in Social Security benefits after retirement. How much their families would get now if they died.

Nearly 28,000 people requested the free information online in March at <http://www.ssa.gov>

‘As soon as crooks start exploiting this service to get other people’s information, Social Security is going to have a real problem on its hands,’ warns Evan Hendricks, chairman of the U.S. Privacy Council, a Washington DC based federation of privacy activists.”

■ *USA Today*, reported by Simson L. Garfinkel

## **Social Security Officials Pull The Plug**

### **Agency turns off popular Web site amid privacy fears**

WASHINGTON (AllPolitics, April 9) – The Social Security Administration took its controversial Web site offline today, in response to concerns that snoopers and hackers could gain access to citizens' private information for fraudulent purposes.

Several senators sent a letter to Social Security officials on Tuesday, expressing worry that a section of the Web site which offered information on an individual's annual income and available benefits was vulnerable to misuse.

The decision to take the information offline, at least temporarily, was announced at a news conference this afternoon. Acting Social Security Commissioner John Callahan said the site was shut down at 3 p.m. EDT.

The agency plans to hold public hearings across the U.S. in the next two months on privacy and computer security issues before officials make a final decision on the fate of the Web site, Callahan said.

■ CNN

## **Social Security praised for flexibility**

WASHINGTON (September 5, 1997) - Social Security's plan to tighten the security of a service letting taxpayers see their retirement records on the Internet is being touted as a model for the rest of the government. But skeptics remain.

"I hope that other agencies will see this as a blueprint and ... use the Internet to provide people with access to their own personal information while attending to the privacy concerns that we all have," said Deirdre Mulligan, staff counsel at the Center for Democracy and Technology, a group that defends civil liberties on the Internet.

Acting Social Security Commissioner John J. Callahan announced Thursday that his agency will roll out a more modest and secure version of its online service by the end of this year.

"We recognize that the Internet is here to stay, and we want to make use of it," Callahan said.

People will be able to get online estimates of their retirement benefits, but the earnings and tax histories used to make those calculations will be sent out only through the regular mail.

To further ensure the safety of the service, Callahan said, people will have to make a specific e-mail request that their benefit estimates be

"unlocked" for Internet access. They will receive an activation code to open their record, and will be able to lock it again when they have finished with it.

Activation codes will be provided only to computer users who have a verifiable, individual Internet account - such as through an employer or an online subscriber service.

Still, some remained critical, including Rep. Jim Bunning, R-KY, who chairs the House Ways and Means subcommittee on Social Security.

"I am not convinced that ... (Social Security) has reached a safe balance between user privacy and easy access to records," Bunning wrote in a letter to Callahan Thursday, suggesting he may call a congressional hearing...."

■ CNN

**APPENDIX A: JANE Q. PUBLIC PEBES**

Your Personal Earnings and Benefit Estimate Statement from the SOCIAL SECURITY ADMINISTRATION

January 19,1997

JANE Q PUBLIC  
123 MAIN ST  
WASHINGTON DC 20225

**A Message from the Commissioner of Social Security**

We are pleased to send you the Personal Earnings and Benefit Estimate Statement that you requested. It shows the estimated amount of benefits, under current law, that you and your family may be eligible for now and in the future. The statement also lists the earnings your employers (or you, if you're self-employed) have reported to Social Security. If your records don't agree, please let us know right away.

Social Security is not intended to meet all your financial needs. When you retire, you will need other income, such as savings and a pension if you wish to maintain your current lifestyle.

Social Security provides more than retirement benefits. Social Security disability insurance coverage protects you from loss of income if you become too disabled to work. And your family can get Social Security survivor benefits if you should die.

Social Security has worked for all of us for over 60 years. The Social Security Board of Trustees projects that the system has enough money to pay full benefits for the next 32 years. This means there is time for the Congress to make changes to safeguard the program's financial future. Over the years, Social Security has changed to meet workers' and beneficiaries' needs. It will undoubtedly change to meet those needs in the 21st century.

John J. Callahan  
Acting Commissioner of Social Security

**The Facts You Gave Us**

Your Name .....	Jane Q. Public
Your Social Security Number .....	999-99-9999
Your Date of Birth .....	11/16/1941
1996 Earnings .....	\$35,000
1997 Earnings.....	\$36,000
Your Estimated Future Average Yearly Earnings .....	\$37,000

Age You Plan To Stop Working ..... 62  
 Other Social Security Numbers You've Used ..... None

**Your Social Security Earnings**

On page 4, we explain more about covered earnings and Social Security and Medicare taxes. The following chart shows your reported earnings. It may not show some or all of your earnings from last year because they are not yet recorded. This year's earnings will not be reported to us until next year.

If your own records do not agree with the earnings amounts shown, please contact us right away.

Years Earnings	Social Security			Medicare		
	Maximum Taxable	Your Reported Earnings	Estimated Taxes You Paid	Maximum Taxable Earnings	Your Reported Earnings	Estimated Taxes You Paid
1937-50	\$3,000	\$0	\$0			
1951	3,600	0	0			
1952	3,600	0	0			
1953	3,600	0	0			
1954	3,600	0	0			
1955	4,200	0	0			
1956	4,200	0	0			
1957	4,200	0	0			
1958	4,200	0	0			
1959	4,800	0	0			
1960	4,800	165	4			
1961	4,800	0	0			
1962	4,800	0	0			
1963	4,800	0	0			
1964	4,800	1,520	55			
1965	4,800	4,000	145			
1966	6,600	4,500	173	\$6,600	\$4,500	\$15
1967	6,600	4,530	176	6,600	4,530	22
1968	7,800	5,710	216	7,800	5,710	34
1969	7,800	6,350	266	7,800	6,350	38
1970	7,800	4,825	202	7,800	4,825	28
1971	7,800	1,584	72	7,800	1,584	9
1972	9,000	7,544	347	9,000	7,544	45
1973	10,800	8,095	392	10,800	8,095	80
1974	13,200	13,200	430	13,200	8,693	78
1975	14,100	14,100	474	14,100	9,389	86
1976	15,300	10,265	508	15,300	10,265	92
1977	16,500	10,899	539	16,500	10,899	98
1978	17,700	11,844	598	17,700	11,844	118
1979	22,900	13,843	703	22,900	13,843	145
1980	25,900	15,318	778	25,900	15,318	160
1981	29,700	17,113	915	29,700	17,113	222
1982	32,400	18,462	996	32,400	18,462	240
1983	35,700	19,830	1,070	35,700	19,830	257
1984	37,800	20,361	1,099	37,800	20,361	264
1985	39,600	21,338	1,216	39,600	21,338	288
1986	42,000	23,513	1,340	42,000	23,513	340
1987	43,800	26,091	1,487	43,800	26,091	378
1988	45,000	26,163	1,585	45,000	26,163	379
1989	48,000	27,984	1,695	48,000	27,984	405
1990	51,300	29,352	1,819	51,300	29,352	425
1991	53,400	30,109	1,866	125,000	30,109	436
1992	55,500	30,528	1,892	130,000	30,528	442
1993	57,600	31,761	1,969	No Limit	31,761	460

1994	60,600	33,136	2,053	No Limit	33,156	480
1995	61,200	36,193	2,243	No Limit	36,193	524
1996	62,700	Not Yet Recorded		No Limit	Not Yet Recorded	
1997	65,400	No Limit				

**Total estimated Social Security taxes paid \$29,325 Total estimated Medicare taxes paid \$6,588**

**Your Estimated Social Security Benefits**

Your work under Social Security helps you and your family to qualify for benefit payments. The kinds of benefits you might get are described below. For each benefit, you need a certain number of work credits (see page 5). Once you have enough credits, your benefit amount depends on your average earnings over your working lifetime. We used the earnings in the chart on page 2 to figure your credits and estimate your benefits. We included any 1996 and 1997 earnings and any estimated future earnings you told us about.

**Retirement Benefits**

To get Social Security retirement benefits, you need 40 credits of work. That is also how many you need for Medicare at age 65. Your record shows that you have enough credits.

On page 5, we explain about different ages when you can retire. If you worked at your present rate up to each retirement age, your monthly amount would be about:

- At age 62 (reduced benefit) ..... \$ 84
- At full-retirement age (65 and 8 months)..... \$ 1,140
- At age 70 ..... \$ 1,530

**Disability Benefits**

On page 6, we tell you about disability benefits. If you become disabled right now you need 34 credits to qualify for disability benefits. You had to earn 20 of these credits in the last 10 years. Your record shows that you have earned enough credits within the right time.

Right now your monthly disability amount would be about .....\$ 1,070

**Family Benefits**

If you get retirement or disability benefits your spouse and young children may also qualify for benefits. See page 6 for more information about family benefits.

**Survivor Benefits**

If you die, certain members of your family may qualify for survivor benefits on your record. See page 6 for an explanation of who may qualify.

If you die right now, you need 34 credits for your survivors to get benefits. Your record shows you have enough. If they met all other requirements, monthly benefit amounts would be about:

- For your child ..... \$ 810
- For your spouse who is caring for your child ..... \$ 810
- When your spouse reaches full-retirement age ..... \$ 1,085
- For all your family members, if others also qualify (more children,  
For example) ..... \$ 1,900

We may also be able to pay your spouse or children a one-time death benefit of \$255.

**Medicare**

Medicare hospital and medical insurance is a two-part benefit program that helps protect you from the high costs of medical care. Hospital insurance benefits (Part A) help pay the cost when you are in the hospital and for certain kinds of follow-up care. Medical insurance benefits (Part B) help pay the costs of doctors' services.

If you have enough work credits, you may qualify for Medicare hospital insurance at age 65, even if you are still working. You may qualify before age 65 if you are disabled or have permanent kidney failure. Your spouse may also qualify for hospital insurance at

65 on your record.

Almost anyone who is 65 or older or who qualifies for Medicare hospital insurance can enroll for medical insurance. You must pay a monthly premium for it.

**For More Information or To Correct Your Record**

After you read this statement, please call 1-800-537-7005\* if you have any questions, if you need to report any missing or wrong earnings on your record or if you want to apply for benefits. Be sure to have your Social Security number available. And remember, this statement is not a decision on a claim for Social Security or Medicare Benefits. You do not qualify for any of these benefits unless you apply for them and meet all the requirements. This statement is just an estimate of what you may get. In the meantime your record is updated every year. You can request a new statement to make sure it stays correct.

\*Social Security treats all calls confidentially – whether they are made to our toll-free number or to one of our local offices. But we also want to be sure that you receive accurate and courteous service. That is why we have a second Social Security representative listen to some incoming and outgoing telephone calls.