

### The Two Types of Section 215 Orders:

	<b>Call Detail Records (CDR) program orders</b>	<b>‘Traditional’ business record orders</b>
US Code	50 U.S. Code § 1861(b)(2)(C)	50 U.S. Code § 1861(b)(2)(B)
Records subject to collection	Phone identifier and phone call information, telephone calling card numbers, and other “session-identifying information”	Any ‘tangible things,’ including email records, purchase records, medical records, call records, books, papers, and documents
Collection Standard	Reasonable grounds to believe records sought are “relevant to an authorized investigation” <i>to protect against international terrorism</i>	Reasonable grounds to believe records sought are “relevant to an authorized investigation” <i>to obtain foreign intelligence information</i>
Specific selection term (the seed target)	“specifically identifies an individual, account, or personal device”	“specifically identifies a person, account, address, or personal device, or any other specific identifier”
Okay to target US persons	If “to protect against international terrorism”	If “to protect against international terrorism or clandestine intelligence activities”
Suspicion by association (contact chaining)	Explicitly allows the government to collect ‘two hops’: the records of those with whom the target communicated, <i>and then</i> the records of the people with whom those people communicated	“Targets” can include people in contact with but not suspected of being agents of foreign powers “Relevant to” standard could be met if a person purchases something a target might also purchase (for example beauty supplies or pressure cookers)
Duration	Records produced daily for up to 180 days	Order may be reissued or updated
# of 2018 orders	14	56
# of targets	11	60
Number of identifiers in 2018	19,372,544 phone identifiers (such as device identifiers)	214,860 (This only counts identifiers “used to communicate information,” like phone numbers and email addresses)
# of records	434,238,543	Not required to be reported