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Communications Assistance for Law Enforcement Act - CALEA

Flexible Deployment Assistance Guide

Department of Justice
Federal Bureau of Investigation
CALEA Implementation Section
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INTRODUCTION

The purpose of this "Communications Assistance for Law Enforcement Act (CALEA) Flexible Deployment Assistance Guide" (Guide) is to assist telecommunications carriers in meeting certain requirements of CALEA.[1] This Guide requests telecommunications carriers to voluntarily submit certain information to the Federal Bureau of Investigation (FBI), and explains under what circumstances, based on a review of that information, the FBI might support a carrier's request to the Federal Communications Commission (FCC) for an extension under Section 107(c) of CALEA.[2] The Guide also provides some general background information regarding CALEA, and discusses lawfully-authorized electronic surveillance, technical solutions being developed by the industry, and cost reimbursement provisions of CALEA.

As explained further in the Guide, telecommunications carriers are under an obligation to meet certain CALEA assistance capability requirements by the June 30, 2000 and September 30, 2001 deadlines specified by the FCC. The "Flexible Deployment Plan" is the FBI's proposed method for evaluating the situations of those carriers proposing to request the FCC for an extension of a deadline of compliance with CALEA's assistance capability requirements. Carriers choosing to submit information in response to the Guide are strongly encouraged to do so on or before March 31, 2000.

If, after reviewing the information submitted, the carrier and the FBI are able to arrive at a mutually agreeable CALEA deployment schedule, the FBI would not oppose the carrier's request to the FCC for an extension, provided that the carrier then proceeded with its deployment in accordance with the schedule. An agreed-to deployment schedule could benefit both parties in many ways, including avoiding a dispute before the FCC regarding an extension request. The FCC has stated that it would accord "significant weight" to such an agreement, in determining whether to grant an extension to a carrier.[3] Carriers should note, however, that the ultimate decision on any extension rests solely with the FCC.

What is Electronic Surveillance?

Lawfully-authorized electronic surveillance is a law enforcement tool that police and other authorized government agencies use to investigate and prosecute criminals. Its use by such agencies is strictly limited by law. Lawfully-authorized electronic surveillance is a law enforcement agency's or organization's collection of either (1) the content[4] of any communication sent by or to a subject of surveillance; or (2) the dialing or signaling information that identifies the origin, direction, destination, or termination of any communication generated or received by a subject of surveillance by means of any equipment, facility, or service of a telecommunications carrier.

In 1968, Congress carefully considered and passed the Omnibus Crime Control and Safe Streets Act (Pub. L. No. 90-351, 82 Stat. 212) which laid out the meticulous procedures law enforcement must follow to obtain the necessary judicial authorization to conduct electronic surveillance in the fight against crime. The law was enacted after Congress exhaustively debated issues concerning law enforcement's need to effectively address serious criminal activity and an individual's right to privacy.

In 1970, Congress amended the federal wiretap statute to require providers of communications services to provide law enforcement with the ". . . technical assistance necessary to accomplish the intercept . . ."[5] In the old telecommunications environment, only minor assistance from telephone companies was needed by law enforcement to accomplish the interception (e.g., identity of "access points," etc.). However,

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[1] See 47 U.S.C. §1001, et seq.; see also CALEA Cost Recovery Regulations, 28 C.F.R. Part 100; Final Notice of Capacity: Implementation of Section 104 of the Communications Assistance for Law Enforcement Act, Notice, 63 Fed. Reg. 12217; Petition for the Extension of the Compliance Date under Section 107 of the Communications Assistance for Law Enforcement Act, *Memorandum Opinion and Order*, 13 FCC Rcd 17990; Second Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999); and Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999).

[2] The FBI believes that submission of the requested information by a carrier could facilitate a mutually beneficial agreement between the FBI and the carrier. However, carriers should be aware that submission of information in response to this Guide is completely voluntary; and does not create any legal obligation on the part of the Federal Government or the carrier. The Guide is not intended to make any offers nor provide legal advice. If carriers have any questions regarding their legal obligations under CALEA they should consult their own legal advisors.

[3] See Second Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No., 97-213 (rel. August 31, 1999), ¶ 37, n.100.

[4] The content of communications applies to any type of wire or electronic communications sent by or to the subject of lawfully-authorized electronic surveillance (i.e., any transfer of messages, signals, writing, images, sounds, data, or intelligence of any nature).

[5] 18 U.S.C. § 2518(4).

in today's telecommunications environment, greater assistance is necessary because newer and more advanced telecommunications technologies, services, and features are now being offered by service providers.

In 1978, Congress passed the Foreign Intelligence Surveillance Act (FISA, 50 U.S.C. §§ 1801-1843) to safeguard national security by authorizing select government agencies to conduct electronic surveillance of a foreign power or an agent of a foreign power for the purpose of obtaining foreign intelligence information. Section 1805(b)(2)(B) of FISA requires that common carriers furnish ". . . all information, facilities, or technical assistance necessary to accomplish the electronic surveillance in such a manner as will protect its secrecy and produce a minimum of interference. . ." with the services of the target of electronic surveillance.

In 1986, as a result of developments in telecommunications and computer technologies, Congress found it necessary to enact the Electronic Communications Privacy Act (Pub. L No. 99-508, 100 Stat. 1848), which amended the Omnibus Crime Control and Safe Streets Act by broadening its coverage to include electronic communications (including electronic mail, data transmissions, faxes, and pagers). The provisions of Title III of the 1968 Act, as amended, continue to govern the procedures for obtaining legal authority for initiating and conducting lawful interceptions of wire, oral, and electronic communications.

Types of Electronic Surveillance

For the purpose of this Guide, lawfully-authorized electronic surveillance is considered to consist of both the interception of communications content (commonly referred to as wiretaps) and the acquisition of dialing and signaling information used to identify a call (dialed number information) through the use of pen registers and/or through the use of trap and trace devices.

The interception of communications, or *call content* surveillance, applies to the provision of actual information (e.g., signs, signals, writing, images, sounds, data, or intelligence of any nature) transmitted from one party to another. Authority for initiating a call content surveillance is found in Title III of the Omnibus Crime Control and Safe Streets Act or FISA.

The term *pen register* applies to the recovery and recording of the dialing information that addresses a call from an intercept subject. Authority for initiating a pen register surveillance can be found in 18 U.S.C. § 3123 and 50 U.S.C. § 1842.

The term *trap and trace* applies to the acquisition of an incoming, originating number of any wire or electronic communication. Authority for initiating a trap and trace surveillance can also be found in 18 USC § 3123 and 50 U.S.C. § 1842.

What is CALEA?

In October 1994, Congress again took action to protect public safety and national security by enacting CALEA, (Pub. L. No. 103-414, 108 Stat. 4279). The law clarifies and further defines the existing statutory obligation of providers of telecommunications services in assisting law enforcement in executing electronic surveillance court orders.

CALEA does not change or expand law enforcement's fundamental statutory authority to conduct various types of electronic surveillance. It seeks to ensure that after law enforcement obtains the appropriate legal authority, telecommunications carriers will have the necessary technical capability and sufficient capacity to fulfill their statutory obligations to assist law enforcement. In many instances, telecommunications carriers have neither the capability nor the capacity to handle all electronic surveillance court orders.

CALEA sets forth, in law, the assistance capability requirements that telecommunications carriers need to meet and maintain within their networks to assist law enforcement in conducting lawfully-authorized electronic surveillance. Specifically, CALEA directs the telecommunications industry to design, develop, and deploy solutions that meet specific assistance capability requirements.[6]

CALEA also recognizes that some existing equipment, services, and features would have to be retrofitted and includes a provision by which the Attorney General could reimburse the industry for modifications made to equipment, facilities, and services installed or deployed on or before January 1, 1995.

[6] Section 103 of CALEA, 47 USC § 1002.

Important CALEA dates

October 24, 1994 - Date of CALEA enactment

January 1, 1995 - Reimbursement eligibility date for equipment, facilities, and services installed or deployed in a carrier's network

October 25, 1998 - Original CALEA assistance capability compliance date

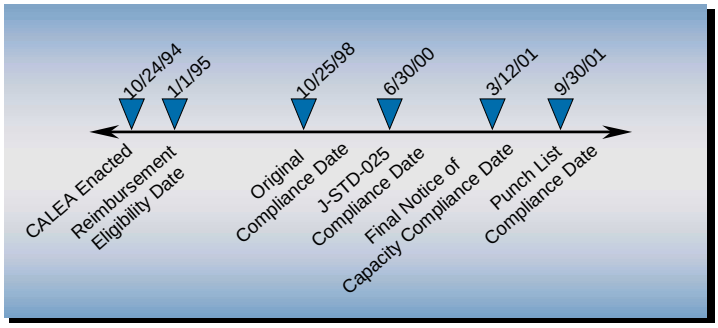


Figure 1 - CALEA Timeline

June 30, 2000 - New compliance date for Section 103 assistance capability requirements for all telecommunications services and technologies (e.g., Telecommunications Industry Association [TIA] interim technical standard J-STD-025 for wireline, cellular, and broadband Personal Communications Services [PCS])

March 12, 2001 - Compliance date of carriers providing local exchange, cellular, and broadband PCS services for capacity requirements as enumerated in the Final Notice of Capacity (63 Fed. Reg. 12217)

September 30, 2001 - Compliance date for wireline, cellular, and broadband PCS to comply with the additional assistance capability requirements as determined by the FCC[7]

TECHNICAL SOLUTION

CALEA was enacted to ensure that ongoing technological changes in the telecommunications industry would not compromise the ability of federal, state, and local law enforcement agencies to conduct lawfully-authorized electronic surveillance. To that end, CALEA obligates telecommunications carriers to ensure that their equipment, facilities, and services are technically capable of expeditiously isolating and delivering to law enforcement agencies all communications content and call-identifying information that law enforcement is authorized to acquire.

Several years before the passage of CALEA, law enforcement began meeting with individual telecommunications companies, as well as industry forums such as the Electronic Communications Service Provider (ECSP) Committee. A primary objective of those meetings was to develop a common understanding of law enforcement's surveillance requirements and to explore options by which a network-based or switch-based interception might be implemented. The ECSP Committee, with law enforcement's endorsement, brought electronic surveillance requirements and issues to the attention of industry standards-setting organizations such as the TR45 and TR46 Committees of TIA.

In May 1995, TIA's TR45.2 Subcommittee formed the Lawfully Authorized Electronic Surveillance (LAES) Ad Hoc Group. Its mission was to develop a technical electronic surveillance standard detailing what information should be accessed to support lawfully-authorized electronic surveillance and how intercepted communications and call-identifying information should be delivered by a telecommunications carrier to a law enforcement agency. In late 1995, PCS and wireline standards bodies agreed to work with the TR45.2 group, which normally represents the cellular industry, on a standard for wireline and wireless networks.

Core J-Standard

On December 8, 1997, TIA published an interim technical standard[8] (J-STD-025, or J-Standard) concerning electronic surveillance assistance capability requirements for telecommunications carriers providing wireline, cellular, and broadband PCS. J-STD-025 describes advanced electronic surveillance capabilities intended to provide law enforcement the ability to collect call-identifying information and call content pursuant to lawful authorization.

[7] On August 31, 1999, the FCC adopted its Third Report and Order regarding the assistance capability requirements of CALEA. In it, the FCC determined that the industry's interim technical standard did not contain all the assistance capabilities required by CALEA.

[8] An interim technical standard was jointly published by TIA and Committee T1 (sponsored by the Alliance for Telecommunications Solutions) as J-STD-025, *Lawfully Authorized Electronic Surveillance*.

The original assistance capability compliance date for CALEA, October 25, 1998, was extended by the FCC[9] for J-STD-025 to June 30, 2000. The FCC determined that carriers could not comply with the original October 25, 1998 compliance date because of the absence of available technology during the compliance period.

Missing Capabilities

On March 27, 1998, the Department of Justice (DOJ) and the Federal Bureau of Investigation (FBI) filed a joint petition before the FCC. The DOJ/FBI petition argued that the industry's J-STD-025 was deficient in that it failed to include nine capabilities determined by DOJ as necessary to meet the requirements of this law.

On August 31, 1999, the FCC released its Third Report and Order, regarding Section 103 assistance capability requirements.[10] The FCC determined that, in addition to the assistance capabilities included in J-STD-025, wireline, cellular, and broadband PCS carriers must provide *six* additional assistance capabilities sought by the DOJ and FBI.[11] These assistance capabilities must be implemented by September 30, 2001.

The six capabilities determined by the FCC to be required by CALEA are:

- Content of subject-initiated conference calls
- Party Hold, Join, Drop messages
- Access to subject-initiated dialing and signaling
- In-band and out-of-band signaling (Notification Message)
- Timing to associate call data to content
- Dialed digit extraction (post-cut-through dialed digits)

For a description of each of the six capabilities outlined above, please refer to Appendix C.

[9] Petition for the Extension of the Compliance Date under Section 107 of the Communications Assistance for Law Enforcement Act, *Memorandum Opinion and Order*, 13 FCC Rcd 17990.

[10] Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999).

[11] See *In the Matter of Establishment of Technical Requirements and Standards for Telecommunications Carrier Assistance Capabilities under the Communications Assistance for Law Enforcement Act*, Public Notice, CC Docket No. 97-213, DA 98-762, (rel. April 20, 1998) (encompassing petitions filed by CDT, TIA, CTIA, and DOJ/FBI).

Location Information

J-STD-025 includes a *location* capability that is intended to provide law enforcement, where authorized, with the location of a subject of lawfully-authorized electronic surveillance. The information regarding the location of a subject is limited to the cell site of the subject's terminal only at the beginning and end of a call. Under the law, this information is not available when a law enforcement agency is acting solely under the authority of a pen register order.

In its Third Report and Order, the FCC determined that ". . . a subject's cell site location at the beginning and end of a call is considered call-identifying information under CALEA."[12] Further, the FCC required that this capability be deployed by telecommunications carriers by the previously established June 30, 2000 CALEA compliance date.

Packet Mode Communications

J-STD-025 provides law enforcement the capability to access call-identifying information regardless of the transmission mode (circuit-switched or packet-mode) utilized by carriers in providing service.

In its Third Report and Order, the FCC determined that carriers could provide the capability to intercept packet-switched communications in accordance with J-STD-025. The FCC mandated that the capability to intercept packet-switched communications be made available by September 30, 2001. The FCC also invited TIA to study alternative technical solutions that would provide for separated delivery of call-identifying information and communications content.

REIMBURSEMENT

To facilitate CALEA's implementation, Congress authorized $500 million to be appropriated to reimburse the telecommunications industry for certain eligible costs associated with modifications made to their networks. Section 109 of CALEA grants the Attorney General discretionary authority to allocate appropriated funds in a manner consistent with law enforcement priorities, and mandates the Attorney General to establish the necessary regulations to effectuate timely and cost-efficient payment to telecommunications carriers. The reimbursement of carriers for any eligible costs will occur under the provisions of Section 109 of

[12] Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999), ¶ 44.

CALEA and the associated Cost Recovery Regulations,[13] and is in no way altered by a carrier's submission of information in response to this Guide.

The Omnibus Consolidated Appropriations Act of 1997 (P.L. 104-208)[14] amended CALEA by adding Title IV which created the Telecommunications Carrier Compliance Fund (TCCF). The purpose of the TCCF is to facilitate the disbursement of funds available for CALEA implementation. Additionally, the Omnibus Consolidated Appropriations Act of 1997 authorized agencies with law enforcement and intelligence responsibilities to transfer unobligated balances into the TCCF, subject to applicable Congressional reprogramming requirements.

Software

The FBI will utilize two alternative approaches for reimbursing CALEA software solutions: (1) right-to-use (RTU) license agreements, or (2) switch-by-switch reimbursement. Both approaches are designed to be consistent with the FBI's goal of maximizing return on TCCF dollars while at the same time responding to industry concerns regarding CALEA compliance costs and deployment schedules. Under the RTU license agreement approach, the FBI expects to reimburse a facilitating carrier for that carrier's purchase of the CALEA software RTU license for a switch installed or deployed on or before January 1, 1995. The license fee covers the manufacturer's CALEA software development cost for a particular switch platform type. Manufacturers are then expected to grant CALEA software RTU licenses to all other carriers at no charge for all switches of the same platform type installed or deployed on or before January 1, 1995.

In some instances, a manufacturer and its facilitating carrier partner may decline to pursue a RTU license purchase agreement with the FBI, or the FBI, manufacturer, and facilitating carrier partner may be unable to finalize an RTU license arrangement. In these cases, manufacturers will design and develop the CALEA solution in accordance with the industry's normal business practices. When a solution is available for deployment, the telecommunications market will determine the solution's price and carriers are expected to install the developed CALEA solution. Some of the installations may be eligible for reimbursement under CALEA. Under a switch-by-switch reimbursement approach, carriers will be reimbursed for CALEA software on an individual, switch-by-switch basis at solution deployment.

The reimbursement approach chosen will depend on several factors. These factors include, but are not limited to, availability of TCCF funds, the reimbursement cost for a RTU license for the CALEA solution, per-switch commercial prices for CALEA solutions, and a switching platform's priority status to law enforcement.

Software Deployment

Once CALEA software solutions have been reimbursed by the FBI, it is in the interest of the FBI and industry to minimize, to the extent practicable, the costs associated with deploying the CALEA solution in carriers' networks. The costs associated with deploying CALEA-compliant solutions are expected to be significantly reduced if carriers are allowed to incorporate the deployment of CALEA into their normal generic upgrade cycles.[15] To this end, the FBI's Flexible Deployment Plan provides the opportunity for any carrier to voluntarily supply information to the FBI so that the carrier and the FBI may cooperatively develop a CALEA deployment schedule for that carrier. These schedules may be consistent with a carrier's normal deployment processes and schedules if the schedules maximize the timely deployment of solutions on those switches that are of highest priority to law enforcement.

To accomplish this, the FBI will solicit historical electronic surveillance data from carriers in order to refine switch prioritization based on the most current intercept data available. This list of prioritized switches will be compared with normal deployment plans identified by the carrier. Carriers and the FBI may then agree on a jointly-developed deployment schedule based on this data, deploying first on law enforcement's highest priority switches. In some cases, this process may result in certain switches that were installed or deployed after January 1, 1995, not having the CALEA solution deployed by the June 30, 2000 capability compliance date. In those instances where a carrier and the FBI can agree on a deployment schedule, the FBI will support a carrier's petition of the FCC to issue limited extensions of time for compliance on specific switches installed or deployed after January 1, 1995, consistent with Section 107(c) of CALEA. The above described concept is the central tenet of the FBI's *Flexible Deployment Plan*. For more information regarding Flexible Deployment, please see the Flexible Deployment section of this Guide.

[13] CALEA Cost Recovery Regulations, 28 C.F.R. Part 100.

[14] The Omnibus Consolidated Appropriations Act of 1997; P.L. 104-208, 110 STAT 3009 (1996).

[15] For the purposes of this CALEA Flexible Deployment Assistance Guide, normal generic upgrade cycles are carrier-specific timelines of past and / or future-planned software generic deployments.

Capacity

On March 12, 1998, the FBI published in the *Federal Register* a final notice of the estimated *actual* and *maximum* number of simultaneous call content interceptions, pen registers, and trap and trace devices that law enforcement may conduct in a given geographic area. The Final Notice of Capacity,[16] with a compliance date of March 12, 2001, was published pursuant to Section 104 of CALEA[17] and applies to carriers providing wireline local exchange, cellular and broadband PCS services. The Final Notice of Capacity is also available on the FBI Web site at http://www.fbi.gov/programs/calea/capacity.htm.

In addition to the reimbursement of the cost of software, CALEA also provides for reimbursement of the reasonable costs directly associated with modifications made to any of a carrier's systems or services, as identified in the Carrier Statement required by CALEA Section 104(d), which do not have the capacity to accommodate simultaneously the number of communications content interceptions, pen registers, and trap and trace devices set forth in the capacity notice(s) published in accordance with CALEA Section 104.

In July of 1998, the FBI published a Small Entity Compliance Guide for the Final Notice of Capacity. That publication sets forth guidelines and procedures to assist carriers in complying with the Final Notice of Capacity as required by Section 104 of CALEA. The Small Entity Compliance Guide for the Final Notice of Capacity is also available on the FBI Web site at http://www.fbi.gov/programs/calea/capacity.htm.

FLEXIBLE DEPLOYMENT

The FBI's overall CALEA implementation approach includes supporting telecommunications carriers' deployment of CALEA-compliant solutions in accordance with their normal generic upgrade cycles, where such deployment will not delay implementation of CALEA solutions in areas of high priority to law enforcement. This approach is the result of the FBI's recognition of the issues facing carriers and represents an attempt to minimize the costs and operational impact of CALEA compliance on all carriers. Specifically, carriers wishing to participate in this effort may provide the FBI with their projected CALEA deployment schedules for all switches in their network, as well as information pertaining to any recent lawfully-authorized electronic surveillance activity. Using this information, the FBI and carrier will attempt to develop a mutually agreeable deployment schedule.[18] This approach is also the FBI's attempt to minimize the cost to the Government of implementing CALEA by providing the opportunity for carriers and the FBI to agree on deferring the installation of CALEA-compliant solutions in those instances where public safety and national security would not be jeopardized. Please refer to Appendix D for a high-level process overview of the FBI's Flexible Deployment Plan.

If the FBI and carrier are able to agree upon a deployment schedule, the FBI intends to provide support to an individual carrier's petition before the FCC for extensions of CALEA's June 30, 2000 and September 30, 2001 assistance capability compliance dates. In order to reach such an agreement, the FBI must have an opportunity to: (1) review and comment on proposed carrier deployment schedules, and (2) review information provided by carriers pertaining to recent lawfully-authorized electronic surveillance activity. The FBI's support of a carrier's system-wide extension petition will be conditioned upon the carrier's meeting the agreed-to deployment schedule. In addition, the FBI will request the FCC incorporate such a condition into any final decision on a carrier's extension petition. A carrier choosing not to provide information necessary for the FBI to support its system-wide CALEA deployment schedule may still petition the FCC for an extension of the CALEA compliance date(s).

Section 107(c) of CALEA

Under Section 107(c) of CALEA, a carrier is permitted to file one or more petitions with the FCC for an extension of the Section 103 assistance capability compliance deadline. The maximum extension the FCC may grant under this provision is two years. The FCC is required, by statute, to "consult" with the Attorney General prior to deciding whether to grant the extension. Under a flexible deployment arrangement, the FBI would fulfill this consultative role for the Attorney General, by providing support for the carrier's individual extension petition.

The FBI's support would be conditioned upon an agreement between the carrier and the FBI on a deployment schedule. The schedule must ensure that CALEA-compliant

[16] See *Implementation of Section 104 of the Communications Assistance for Law Enforcement Act;* Notice, 63 Fed. Reg. 12217 (March 12, 1998).

[17] 47 U.S.C. § 1003.

[18] In the event that unforeseen circumstances do not allow a carrier to deploy CALEA-compliant solutions according to the mutually agreed-to schedule, the carrier should notify the FBI as soon as possible. In the interest of public safety and/or national security, emergency or exigent law enforcement circumstances may result in the modification of a previously agreed-to schedule between the carrier and FBI.

solutions are deployed on priority equipment in the near term and that other equipment is modified within a reasonable time. Assuming these conditions are met, a carrier would then be able to deploy solutions on the lower priority equipment in accordance with its normal business cycle.

J-STD-025 CALEA-compliant solutions are to be deployed in a carrier's network (see Figure 2, below). Carriers will develop their own deployment cycles based on: (1) the commercial availability of CALEA-compliant J-STD-025 solutions; (2) market conditions and business plans; and (3) historical lawfully-authorized electronic surveillance activity (i.e., law enforcement priorities). The six-, twelve-, and twenty-four-month deployment cycles shown in Figure 2 are illustrative examples of normal generic upgrade cycles. Actual carrier generic upgrade cycles are expected to differ based on the considerations outlined above.

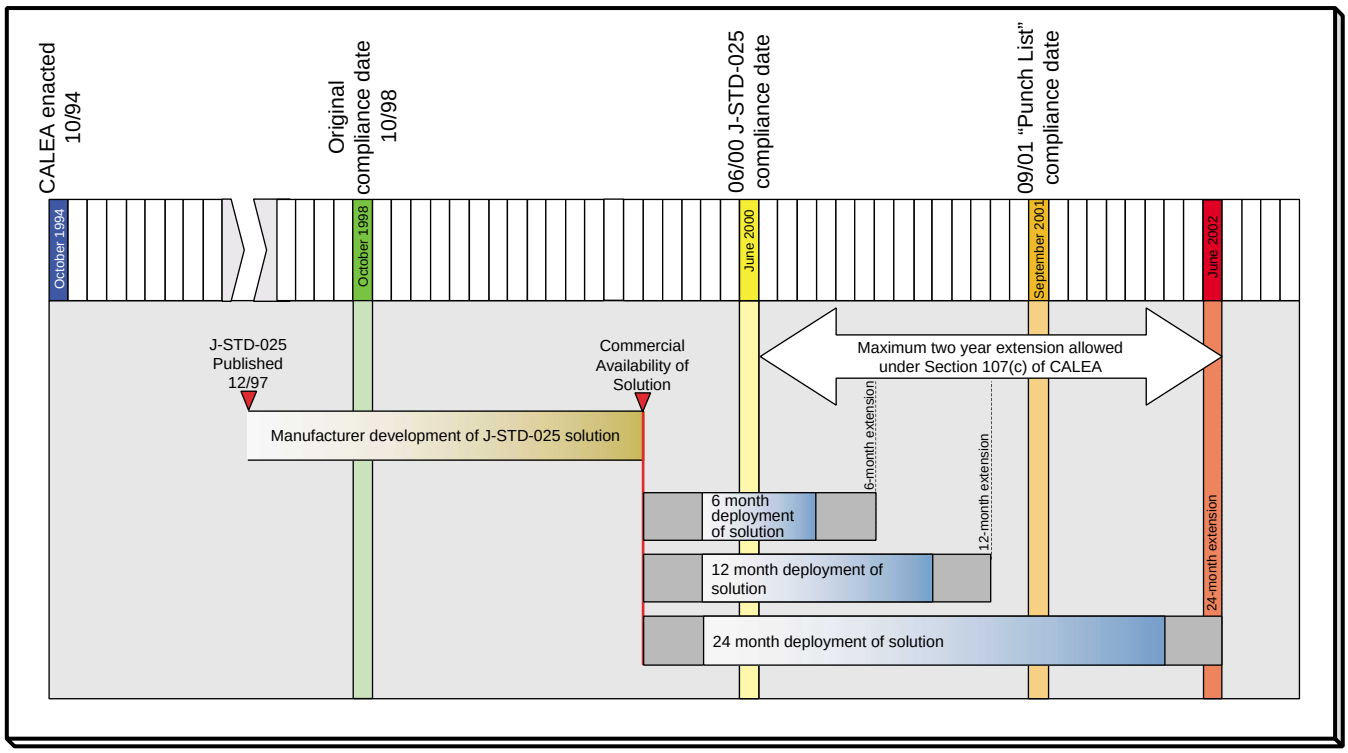


Figure 2 - J-STD-025 & Carriers' Normal Generic Upgrade Cycles

Carriers' Normal Generic Upgrade Cycles

A central element to the FBI's Flexible Deployment Plan is a carrier's normal, or planned, generic upgrade cycle. Individual carriers plan, engineer, and deploy services at different times and at different rates. In order to ensure that carriers can meet their CALEA obligations without being overly burdensome, carriers have the opportunity to advise the FBI of their normal generic upgrade cycles. Past generic upgrades and associated dates can be provided to establish a baseline of previous generic upgrades and validate future expected generic upgrades. See the information descriptions in the following section, Information Collection, and Appendix E for a Sample Flexible Deployment Assistance Guide Template.

Under the FBI's Flexible Deployment Plan, a carrier's normal generic upgrade cycle will play a role in when

Similarly, a carrier's normal generic upgrade cycle will play a role in when "Punch List" CALEA-compliant solutions are to be deployed in a carrier's network (see Figure 3, below). Again, carriers will develop their own deployment cycles based on: (1) the commercial availability of CALEA-compliant "Punch List" solutions; (2) market conditions and business plans; and (3) historical lawfully-authorized electronic surveillance activity (i.e., law enforcement priorities). The six, twelve-, and twenty-four-month deployment cycles shown in Figure 3 are illustrative examples of normal generic upgrade cycles. Actual carrier generic upgrade cycles are expected to differ based on the considerations outlined above.

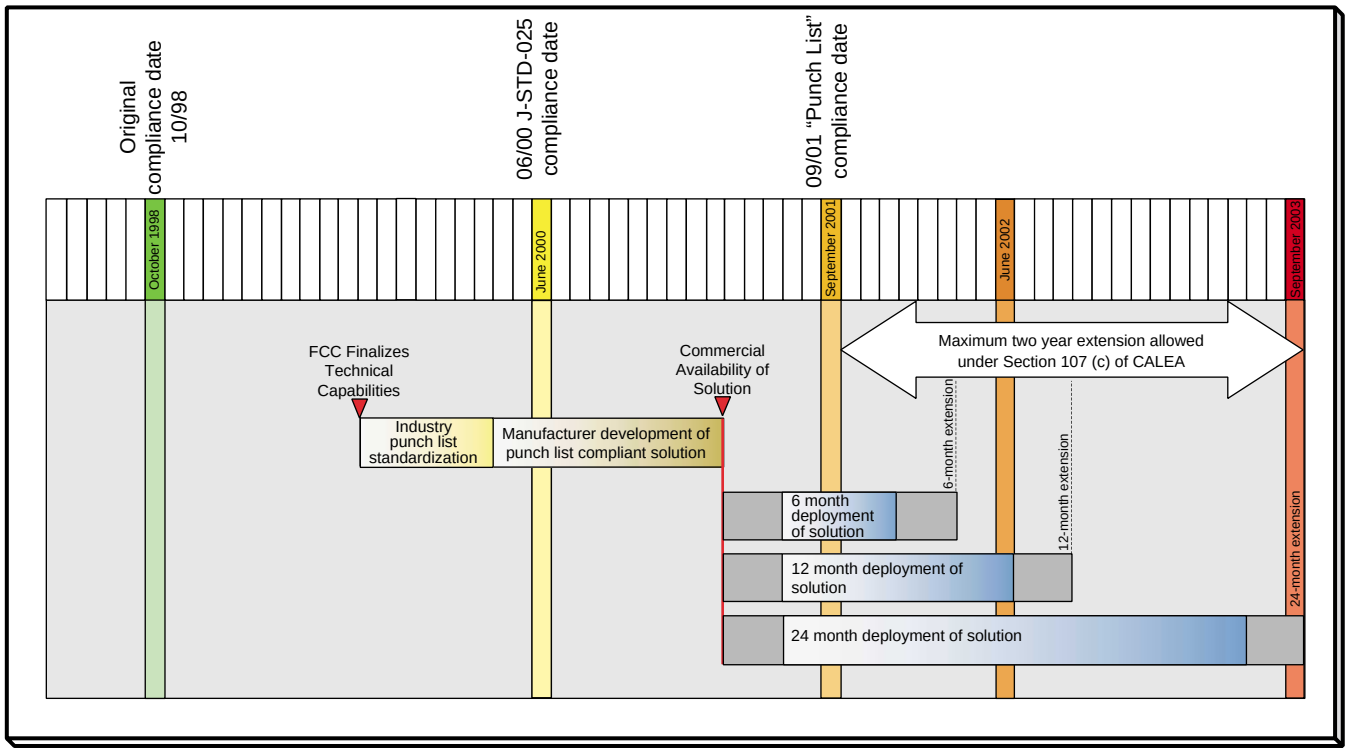


Figure 3 - Final CALEA Capability & Carriers' Normal Generic Upgrade Cycles

Commercial Availability of Solutions

In addition to setting the carriers' assistance capability requirement compliance date of June 30, 2000, the FCC determined that manufacturers of telecommunications equipment (i.e., equipment used in wireline, cellular, and broadband PCS services) had until December 31, 1999, to make compliant solutions commercially available to carriers.

The manufacturers of telecommunications equipment with which the FBI has been holding discussions have indicated that their CALEA capabilities will be made available over a number of software generic releases. The first releases will allow carriers to implement some or all of the core J-STD-025 CALEA capabilities, while later releases will complete the set of capabilities as mandated by the FCC. Some manufacturers have already made initial releases commercially available for carriers to deploy. CALEA-compliant solutions are commercially available on the date a manufacturer first makes its solution available. The FBI recognizes that manufacturers' production cycles may delay a particular carrier's ability to deploy CALEA-compliant software. The FBI expects carriers to incorporate the actual availability of CALEA-compliant solutions (i.e., available to the carrier) when developing their proposed deployment schedules.

Additionally, some manufacturers may not have CALEA-compliant solutions available for carriers to deploy to meet the June 30, 2000, and September 30, 2001 deadlines. Figure 4 shows how a delay in a manufacturer's solution availability may effect carriers' normal generic upgrade cycles for the deployment of a CALEA-compliant J-STD-025 solution. Figure 5 shows how a delay in a manufacturer's solution availability may effect carriers' normal generic upgrade cycles for the deployment of a Final CALEA-compliant solution.

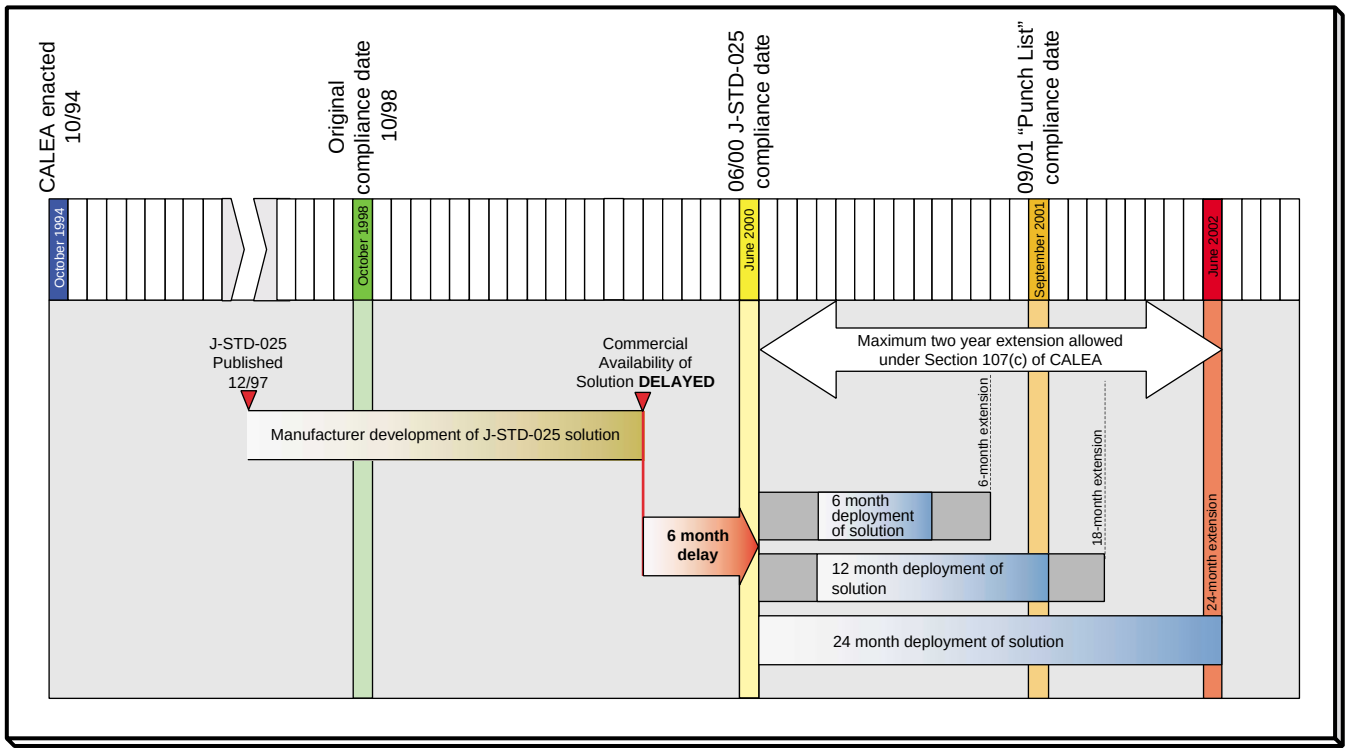


Figure 4 - Delayed Commercial Availability of J-STD-025 Solution

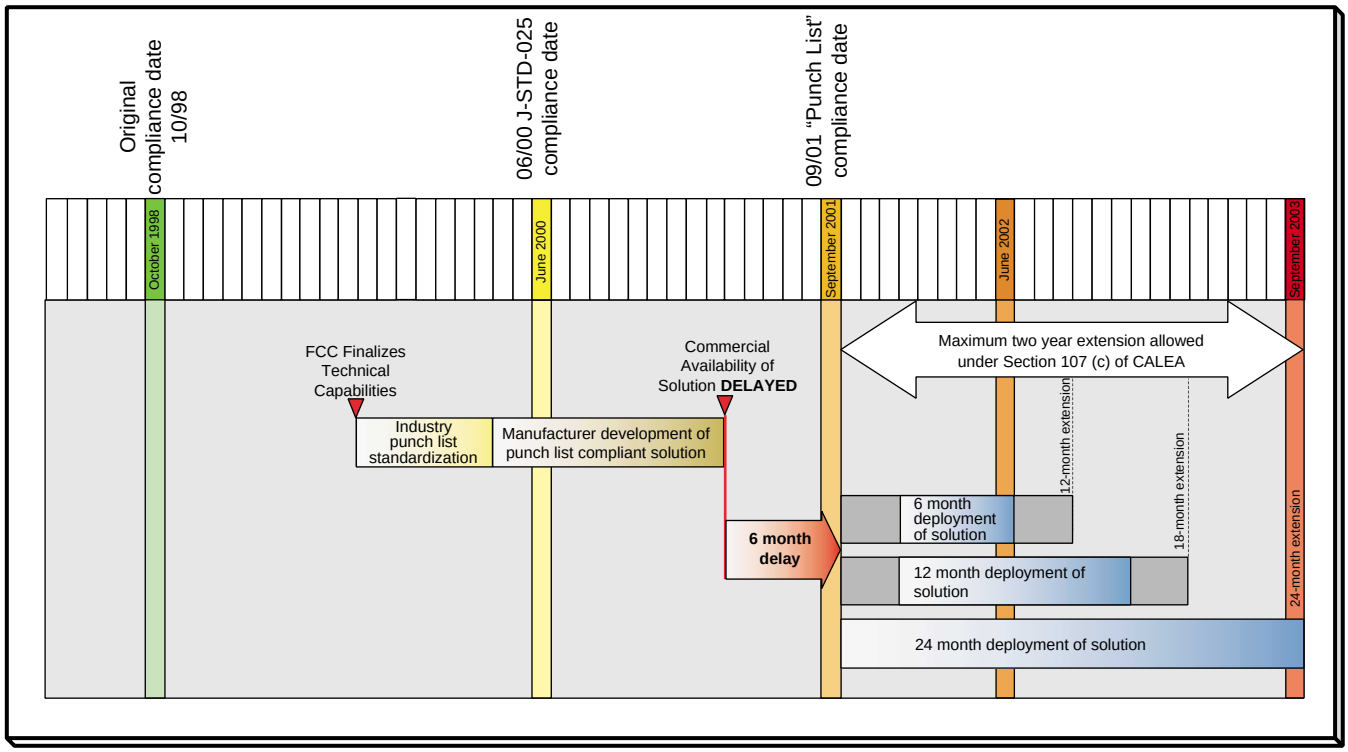


Figure 5 - Delayed Commercial Availability of the Final CALEA Capability Solution

Law Enforcement Priorities

One important factor to the FBI in considering a carrier's proposed CALEA solution deployment schedule is the historical electronic surveillance activity of law enforcement. The equipment, facilities, and services of a carrier which have previously played a role in the execution of lawfully-authorized electronic surveillance are considered by the FBI to be of high priority to law enforcement. These equipment, facilities, and services should be taken into consideration by a carrier when developing its proposed CALEA solution deployment schedule. High priority equipment, facilities, and services scheduled to be replaced should also be identified by a carrier. Figure 6 shows how law enforcement's priorities can be incorporated into a carrier's normal generic upgrade cycle.

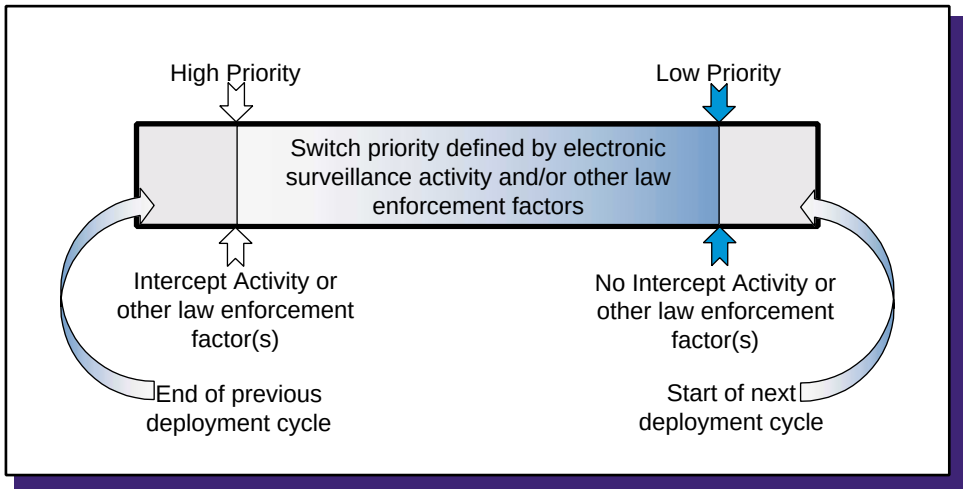


Figure 6 - Law Enforcement Priorities & Carriers' Normal Generic Upgrade Cycles

Section 109(b) of CALEA

In those instances where a carrier finds a solution developed by its manufacturer of telecommunications equipment to be prohibitively expensive for the carrier to deploy, CALEA provides a remedy under Section 109(b). The carrier may choose to petition the FCC with respect to any equipment, facilities, or service on which compliance would not be "reasonably achievable." In its Second Report and Order, the FCC articulated its basis for consideration of individual carrier petitions under CALEA's "reasonably achievable" provision. The FCC stated that: (1) it would be premature to adopt factors in addition to those set forth in Section 109(b), or to assign special weight to any one factor; (2) the Section 109 process should be reserved for the examination of specific carrier compliance problems, not to revisit broad policy goals; and (3) carrier requests for relief from CALEA compliance based on CALEA's costs or impact on rates, quality of service, or introduction of services to the market must be supported by specific facts, including quantitative data.

INFORMATION COLLECTION

As stated previously in this Guide, the FBI's Flexible Deployment Plan is based on (1) a carrier's normal generic upgrade cycle, and (2) law enforcement priorities. In order for the FBI to make an informed decision regarding a carrier's proposed deployment schedule, a carrier may provide information identifying its specific equipment, geographic area(s) served by the equipment, previous generic deployments, future planned generic deployments, and historical lawfully-authorized electronic surveillance activity.

In the following table, the term "switch or equipment" refers to any piece of telecommunications equipment which would need to undergo modification to be compliant with the requirements of CALEA. Examples of "switch or equipment" include end office switches and peripheral equipment such as Home Location Registers (HLR).

A Sample Flexible Deployment Assistance Guide Template is provided in Appendix E. A blank Flexible Deployment Assistance Guide Template is provided in Appendix F. Carriers may use the blank form to provide the above described information. An electronic version of this form is available on the FBI's Website at http://www.fbi.gov. Carriers may submit electronic versions of the Flexible Deployment Assistance Guide Template to the address provided at the end of this Guide.

The intent of the FBI's collection of information is to analyze a carrier's proposed deployment schedule and to assess whether or not the FBI would be willing to support a carrier's petition for an extension of CALEA's assistance capability compliance date(s). Any carrier-provided information marked as proprietary will be treated accordingly by the FBI, and the FBI stands at the ready to enter into an appropriate non-disclosure agreement with any carrier who believes it to be necessary.

Data Type	Description
Carrier Name	The name of the carrier which owns the identified switch or equipment
Contact Person & Telephone Number	The name and telephone number of a person the FBI can contact in the event questions arise with the data submitted
CLLI Code	Common Language Location Identifier or other unique switch or equipment identification
Switch or Equipment Location	The street address, city, and state where the switch or equipment is located
Switch or Equipment Type	The type of host or stand-alone switch or equipment identified by each CLLI Code. For example: 5ESS, DMS-100, EWSD, DMS-MTX, EMX-2500, CMS-8800, S12. In the event that a remote switch will need to be upgraded, include the remote switch type and corresponding host switch
Service Area	The name(s) of the counties, market service areas, or other appropriate geographic areas *where service is provided* by each identified switch or equipment. In the event that a switch or equipment serves multiple areas, each area (county, market service area, or other appropriate geographic area) should be identified. For switches or equipment with remotes, include counties, market service areas, or other appropriate geographic areas where service is provided by each remote
Current Software Generic	The software generic deployed as of January 1, 2000 on the equipment identified by each CLLI Code. For example: 5E12, NAO10
Historical Software Deployment Dates	Previous software deployment dates to establish an individual carrier's normal generic upgrade cycle
Future Planned Software Generic Deployment Dates	The future planned software generic, and deployment dates, to be installed in the identified switch or equipment
Historical Intercept Activity	Number of lawfully-authorized electronic surveillance intercepts (i.e., communications content, pen registers, and traps and traces) which were conducted on each identified switch or equipment by a municipal, county, state, or federal law enforcement agency for the years 1996, 1997, 1998, and 1999

Table 1 - Flexible Deployment Information Elements

Paperwork Reduction Act Notice

The FBI has created this Flexible Deployment Assistance Guide and the associated information collection template (see Appendix F) with the intent for it to be easily understood, and to impose the least possible burden on carriers choosing to provide the FBI with deployment information.

The estimated average time to read this Flexible Deployment Assistance Guide, complete the template, and file the information is as follows: (1) 1 hour to read the Flexible Deployment Assistance Guide; (2) 2 hours to gather the information to complete the Flexible Deployment Assistance Guide Template; (3) 1 hour to complete the Template; (4) 15 minutes to assemble and file the Template; for a total estimated average time of 4 hours and 15 minutes per Template. If you have comments regarding this estimate, or suggestions for simplifying this Guide and the associated information collection template, you can write to both the CALEA Implementation Section (CIS), 14800 Conference Center Drive, Suite 300, Chantilly, Virginia 20151; and the Office of Management and Budget, Paperwork Reduction Project, OMB No. 1110-0030, Washington, D.C. 20503.

ADDITIONAL TECHNOLOGIES
FCC's Second Report and Order

On August 31, 1999, the FCC adopted its Second Report and Order[20] regarding CALEA. In its Second Report and Order, the FCC examined the definition of "telecommunications carrier" set forth in Section 102 of CALEA. The FCC determined that the requirements of CALEA apply to:

- Any entity that holds itself out to serve the public indiscriminately in the provision of any telecommunications service;
- Entities previously identified as common carriers for purposes of the Communications Act,[21] including local exchange carriers, interexchange carriers, competitive access providers, and satellite-based service providers;
- Cable operators, electric, and other utilities to the extent that they offer telecommunications services for hire to the public;
- Commercial mobile radio service (CMRS) providers;
- Specialized Mobile Radio (SMR) providers when their systems interconnect to the public switched telephone network;
- Resellers of telecommunications services to the extent they own equipment with which services are provided;
- Providers of calling features such as call forwarding, call waiting, three-way calling, speed dialing, and the call redirection portion of voice mail; and
- Facilities used by carriers to provide both telecommunications and information services, are subject to CALEA in order to ensure the ability to conduct lawfully-authorized electronic surveillance of the telecommunications services.

The FCC concluded that some categories of entities are not telecommunications carriers subject to CALEA:

- Private mobile radio service (PMRS) providers;
- Pay telephone providers; and
- Information service providers, to the extent they do not provide telecommunications services.

Participation in the FBI's Flexible Deployment Plan is available to all telecommunications carriers subject to the require-ments of CALEA as determined by the FCC in its Second Report and Order. As stated previously in this Guide, a central element to the FBI's Flexible Deployment Plan is a carrier's normal, or planned, generic upgrade cycle. Because individual carriers plan, engineer, and deploy services at different times and at different rates, and in order to ensure that carriers can meet their CALEA obligations without being overly burdensome, carriers have the opportunity to advise the FBI of their deployment schedules.

In order for the FBI to make informed decisions regarding a carrier's proposed deployment schedule, a carrier may provide information identifying its specific equipment, geographic area(s) served by the equipment, previous generic deployments, future planned generic deployments, and historical lawfully-authorized electronic surveillance activity.

In the event that a carrier believes the template provided in Appendix F of this Guide requests information that is not applicable to its network or equipment, or is insufficient for a carrier to characterize its deployment schedule on an equipment-specific basis, a carrier is free to provide deployment information in any form. However, a carrier should provide the name of a contact person and their telephone number, as well as the following switch-, or equipment-specific information: unique equipment identifier; switch or equipment location; service area; current software generic; historical software generic deployment dates; future planned software generic deployment dates; and historical electronic surveillance intercept activity.

FCC's Third Report and Order

On August 31, 1999, the FCC also released its Third Report and Order regarding the assistance capability requirements of CALEA. In its Third Report and Order, the FCC recognized that the industry's J-STD-025 does not cover telecommunications technologies such as paging, specialized mobile radio, and mobile satellite services. In fact, the FCC stated that "[i]ndustry associations or standards-setting organizations that represent such service providers that fit within the definition of a telecommunications carrier under CALEA may establish voluntary standards to achieve compliance with Section 103 by the June 30, 2000 deadline, and take advantage of the safe harbor provision of Section 107(a). The absence of an industry standard, however, does not relieve such carriers from the obligations imposed by Section 103. In the absence of a publicly available standard, a carrier will have to work with its vendors to develop an individual CALEA solution, and a carrier is free to choose a solution that is specifically tailored to its particular system and technology."[22]

[20] Second Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999).

[21] 47 U.S.C. § 153(10).

[22] Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999).

ADDITIONAL INFORMATION

How and Where to Provide Flexible Deployment Assistance Guide Information

Carriers can download an electronic Flexible Deployment Assistance Guide Template from the FBI's Website at http://www.fbi.gov. Upon entering the site, proceed to the CALEA link through the available index (http://www.fbi.gov/programs/calea/calea.htm). The Flexible Deployment Assistance Guide page is available by selecting the *Flexible Deployment Assistance Guide* hyperlink.

Carriers that do not have access to the Internet and wish to acquire the Flexible Deployment Assistance Guide Template in electronic form can request 3.5 inch diskettes containing the electronic template from the address listed below. Carriers may either submit a completed Flexible Deployment Assistance Guide Template in electronic form (any spreadsheet or text file format) or use the Flexible Deployment Assistance Guide Template provided in Appendix F of this Guide. Carriers are strongly encouraged to file their Flexible Deployment Assistance Guide Templates by March 31, 2000, and all completed Flexible Deployment Assistance Guide Templates should be mailed to:

CALEA Implementation Section (CIS)

Attention: Flexible Deployment Assistance Guide

14800 Conference Center Drive, Suite 300

Chantilly, VA 20151-0450

Contact Information

Carriers that have additional questions or comments concerning this Flexible Deployment Assistance Guide can call the following toll-free number:

Communications Assistance for Law Enforcement Act (CALEA)
Flexible Deployment Assistance Guide
Help Desk

800-551-0336

APPENDIX A — FREQUENTLY ASKED QUESTIONS

Q What is the difference between the industry's interim technical standard (i.e., J-STD-025) and the missing technical capabilities (i.e., "Punch List")?

A The industry's interim technical standard (J-STD-025) provides the *majority* of electronic surveillance assistance capabilities required by CALEA. However, the standard failed to include some key evidentiary technical electronic surveillance capabilities, including: (1) content of subject-initiated conference calls; (2) party hold, join, drop; (3) access to subject-initiated dialing and signaling; (4) in-band and out-of-band signaling; (5) timing to associate call data to content; and (6) post-cut-through dialing (dialed digit extraction). See Appendix C for a brief description of each of these capabilities.

Q Which telecommunications carriers are eligible to be reimbursed for technical capability?

A CALEA authorized $500 million for the reimbursement of carriers for reasonable costs associated with making equipment, facilities, and services compliant with the requirements of CALEA. Equipment, facilities, and services installed or deployed on or before January 1, 1995, are eligible for reimbursement, provided the equipment, facility, or service has not been replaced, undergone a significant upgrade or undergone a major modification.

Q What information should a carrier provide the FBI to participate in the FBI's Flexible Deployment Plan?

A As described in the Information Collection Section of this Flexible Deployment Assistance Guide, a carrier should provide the name of a contact person and their telephone number, as well as the following switch-, or equipment-specific information: (1) CLLI Code or other unique equipment identifier; (2) switch or equipment location; (3) service area; (4) current software generic; (5) historical software generic deployment dates; (6) future planned software generic deployment dates; and (7) historical intercept activity.

Q Is it mandatory that a carrier complete the Flexible Deployment Assistance Guide Template?

A No. There is no legislative or other mandate for carriers to provide the information outlined in this Flexible Deployment Assistance Guide. Carrier submission of information to the FBI under the FBI's Flexible Deployment Plan is voluntary. However, the FBI will not be able to provide support for any carrier's petition for extension of CALEA's assistance capability compliance date without specific solution deployment information.

Q What are CALEA's compliance dates that a carrier needs to know?

A First, carriers must be compliant with the J-STD-025 capabilities by June 30, 2000. Second, carriers must comply with the missing technical capabilities (i.e., "Punch List") by September 30, 2001. Carriers providing wireline local exchange, cellular, and broadband PCS services have until March 12, 2001, to comply with the capacity requirements as enumerated in the Final Notice of Capacity (63 Fed. Reg. 12217).

Q How is the FBI working with manufacturers of telecommunications equipment to ensure CALEA solutions will be available for carriers to deploy?

A The FBI is holding discussions with a large number of manufacturers to assess the availability of technical solutions for carriers. To date, the vast majority of manufacturers have notified the FBI that they will make CALEA-compliant solutions available.

Q Will filling out the Flexible Deployment Assistance Guide Template ensure that a carrier receives an extension of the assistance capability deadline?

A No. If the Attorney General determines that a carrier's proposed deployment schedule is consistent with law enforcement priorities, she may then provide support, through the FBI, for the carrier's petition under Section 107(c). The FCC will determine whether or not to grant the petition. The FCC has stated, in its Second Report and Order, that it will accord "substantial weight" to the Attorney General's support for a carrier's petition under Section 107(c).

Q How will carriers be notified of their status after supplying the information identified in this Flexible Deployment Assistance Guide?

A Upon review of carrier-provided deployment information, the FBI will notify a carrier whether the carrier's proposed deployment schedule meets law enforcement's requirements. In those instances where a carrier's proposed deployment schedule meet's law enforcement's requirements, the FBI will provide support of a carrier's Section 107(c) petition before the FCC.

APPENDIX B — GLOSSARY[23]

Actual Capacity — the number of simultaneous call content interceptions, pen registers, and trap and traces that law enforcement may conduct 3 years after the publication of the Final Notice of Capacity.

Basic Trading Area (BTA) — a PCS service area defined by the FCC as a collection of counties, based on the Rand McNally 1992 Commercial Atlas & Marketing Guide.

Broadband Personal Communications Services (PCS) — radio communications operating within the 2 GHz band of the electromagnetic spectrum (from 1850 to 1990 MHz), which encompass mobile and ancillary fixed communication services, including a family of communications devices utilizing very small, lightweight, multifunction portable phones, portable facsimile and other imaging devices, new types of multifunction cordless phones, and advanced devices with two-way data capabilities.

Call Content — in substance, Section 103 of CALEA (47 U.S.C. §1002) requires carriers to ensure that law enforcement agencies are able, pursuant to lawful authorization, to intercept wire and electronic communications carried by the carrier. The phrase "call content" used in this Guide refers to the contents of such lawfully-intercepted communications.

Call-identifying Information — defined in 47 U.S.C. §1001(2) to mean "dialing or signaling information that identifies the origin, direction, destination, or termination of each communication generated or received by a subscriber by means of any equipment, facility, or service of a telecommunications carrier."

Cellular Service — a mobile radiotelephone service in which common carriers are authorized to offer and provide a mobile telecommunications service for hire to the general public using cellular systems. A cellular radio system is an automated, high-capacity system of one or more multichannel base stations designed to provide radio telecommunications services to mobile stations.

CLLI Code — Common Language Location Identifier or equivalent identifier for carrier equipment.

Commercial Availability — the date on which a manufacturer of telecommunications equipment makes software available.

Electronic Communication — defined in 18 U.S.C. §2510(12), in substance, to include any transfer of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic, or a photooptical system.

Electronic Surveillance — for purposes of this Guide, the word "electronic surveillance" is used to refer to either the interception of call content or call-identifying information. The telecommunications service targeted for electronic surveillance includes all of the services and features associated with the subject's wireline/wireless telephone number, or as otherwise specified in a court order or lawful authorization.

Interception — for purposes of this Guide, the word "interception" is used to refer to either the interception of call content or call-identifying information, or both.

J-STD-025 — industry interim technical standard developed to meet the assistance capability requirements of Section 103 of CALEA published in December 1997.

Local Exchange Carrier — any person or entity that is engaged in the provision of telephone exchange service or exchange access. Such term does not include persons or entities engaged in the provision of a commercial mobile service.

Local Loop — the physical connection between a service provider's end office equipment, most often a switch, and a telephone subscriber's home or office.

[23] This Glossary is provided herein solely for the assistance of the reader.

APPENDIX B — GLOSSARY

Major Trading Area (MTA) — a PCS service area defined by the FCC as a collection of BTAs, based on the Rand McNally 1992 Commercial Atlas & Marketing Guide.

Maximum Capacity — the number of simultaneous call content interceptions, pen registers, and trap and traces that law enforcement may conduct after the date that is 3 years after the publication of the Final Notice of Capacity.

Metropolitan Statistical Area (MSA) — a geographic area based on counties, as defined by the U.S. Census Bureau, that contain cities with populations of 50,000 or more.

Normal Generic Upgrade Cycle — carrier-specific timeline of past- and future-planned software generic deployments.

Notice of Capacity — notice of the estimated actual and maximum number of simultaneous call content interceptions, pen registers, and trap and traces that law enforcement may conduct at some future date.

Packet Mode Communications — a method of communications in which the "conversation" (e.g., voice, video, data, or any other transmission) is disassembled into small packets of information. Each packet is uniquely identified, carries its own destination address, and traverses the network in an efficient manner. At the destination site, each packet is reassembled into the original "conversation."

Pen Register — defined in 18 U.S.C. § 3127(3), in pertinent part, as a device that records or decodes electronic or other impulses that identify the numbers dialed or otherwise transmitted on the telephone line to which such a device is attached.

Punch List — nine assistance capability requirements missing from the industry's interim technical standard (J-STD-025), determined by the DOJ to be required by CALEA, and petitioned for by the FBI and DOJ before the FCC. Six of the nine missing assistance capability requirements were subsequently determined by the FCC to be required by CALEA.

Rural Service Area (RSA) — a geographic area not included within either an MSA or a New England Country Metropolitan Area for which a common carrier may have a license to provide cellular service.

Title III — the provision of the Omnibus Crime Control and Safe Streets Act of 1968 (Pub. L. No. 90-351, 82 Stat. 212) that provides law enforcement the necessary authorization to conduct interception of the content of communications.

Telecommunications Carrier — defined in 47 U.S.C. § 1001(8), in pertinent part, as a person or entity engaged in the transmission or switching of wire or electronic communications as a common carrier for hire; or a person or entity engaged in providing commercial mobile service (See also 47 U.S.C. § 332(d)).

Trap and Trace Device — a device that captures incoming electronic or other impulses that identify the originating number of a wire or electronic communication.

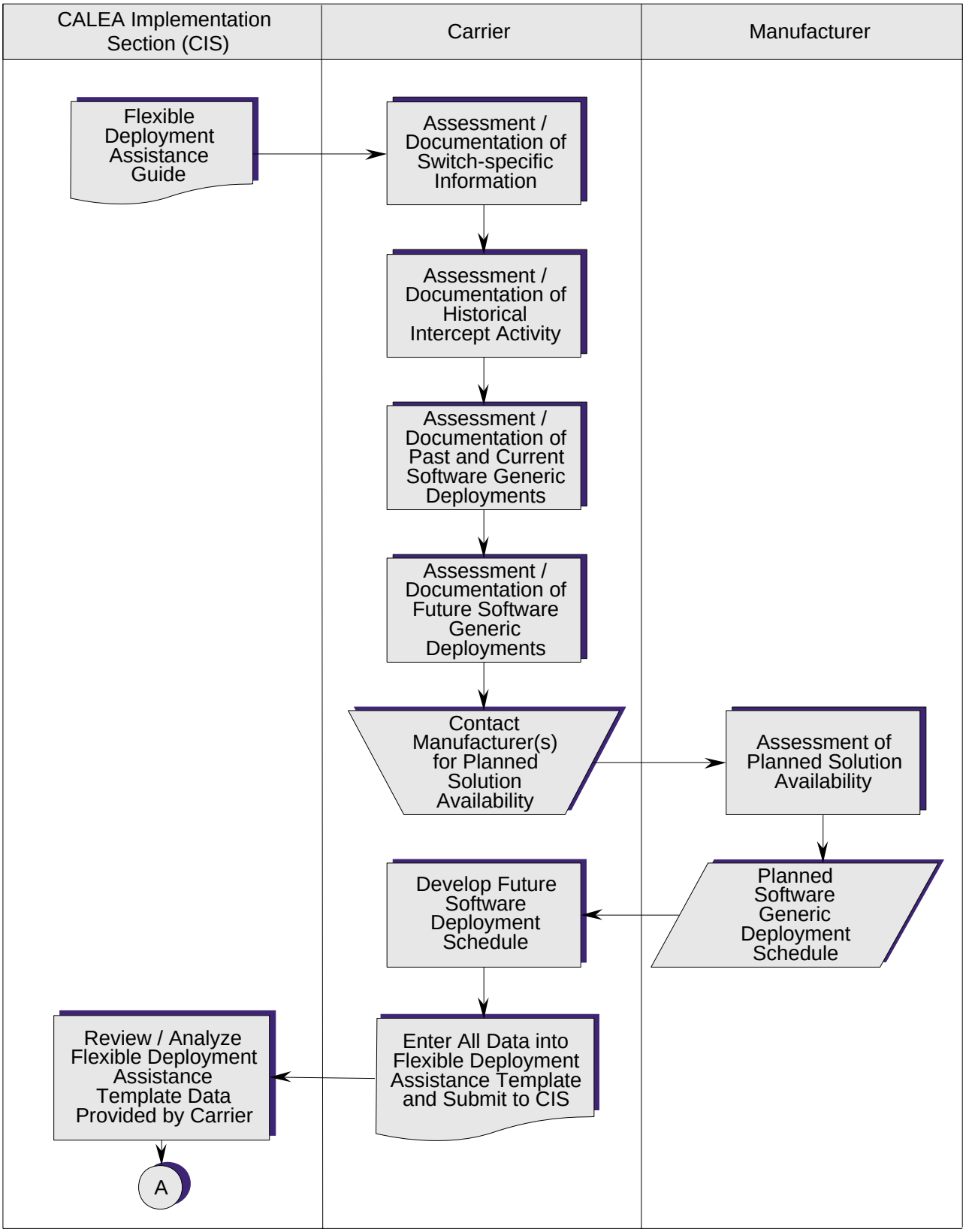
Wire Communication — defined in 18 U.S.C. § 2510(1), in substance, to mean any transfer involving the human voice made in whole or in part through the use of wire, cable, or other like transmission facilities. The term includes communications via cellular telephones.

APPENDIX C - BRIEF DESCRIPTION[24] OF PUNCH-LIST CAPABILITIES DETERMINED BY THE FCC TO BE REQUIRED BY CALEA

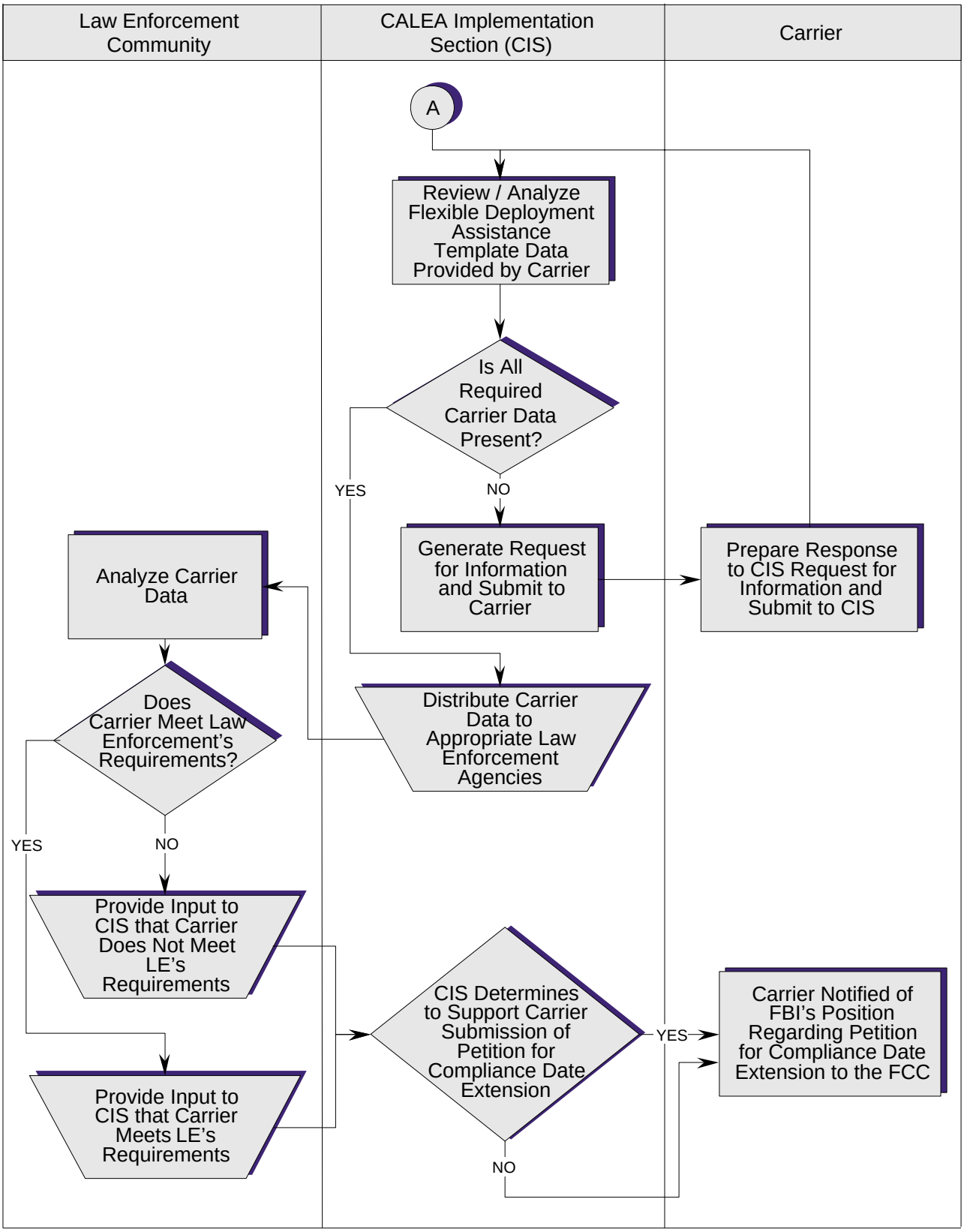
Name	Description
Content of subject-initiated conference calls	This capability would permit a law enforcement agency (LEA) to monitor the content of conversations connected via a conference call. Surveillance of all portions of a conference call would continue, even if any party to the call utilized services such as hold, call waiting, or three-way calling.
Party hold, join, drop	This capability also involves features designed to aid a LEA in the interception of multi-party calls. This capability would permit the LEA to receive from the telecommunications carrier messages identifying the parties to a conversation at all times. The party hold message would be provided whenever one or more parties are placed on hold. The party join message would report the addition of a party to an active call or the reactivation of a held call. The party drop message would report when any party to a call is released or disconnects and the call continues with two or more other parties.
Access to subject-initiated dialing and signaling	This capability would permit the LEA to be informed when a subject, using the facilities under surveillance, uses services such as call forwarding, call waiting, call hold, and three-way calling. This information would be provided for each communication initiated by the subject. This capability would require the telecommunications carrier to deliver a message to the LEA, informing the LEA that the subject has invoked a feature that would place a party on hold, transfer a call, forward a call, or add/remove a party to a call.
In-band and out-of-band signaling (Notification Message)	This technical requirement would enable a telecommunications carrier to send a notification message to the LEA when any network message (ringing, busy, call waiting signal, message light, *etc*.) is sent to a subject using facilities under surveillance. For example, if someone leaves a voice mail message on the subject's phone, the notification to the LEA would indicate the type of message notification sent to the subject (such as the phone's message light, audio signal, text message, *etc*.). For calls the subject originates, a notification message would also indicate whether the subject ended a call when the line was ringing, busy (a busy line or busy trunk), or before the network could complete the call.
Timing to associate call data to content	In those cases where the LEA has obtained authorization to intercept both content and call-identifying information, this capability would require that a telecommunications carrier send call timing information to the LEA so that the LEA could associate the call-identifying information with the actual content of the call.
Dialed digit extraction	This capability would require the telecommunications carrier to provide to the LEA on the call data channel the identity of any digits dialed by the subject after connecting to another carrier's service (also known as "post-cut-through digits"). One example of such dialing and signaling would occur when the subject dials an 800 number to access a long distance carrier. After connecting to the long distance carrier through the 800 number, the subject then dials the telephone number that represents the ultimate destination of the call.

[24] Punch list capabilities as described by the FCC in its Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999).

APPENDIX D - FLEXIBLE DEPLOYMENT DATA SUBMISSION, COLLECTION, REVIEW, AND ANALYSIS PROCESS



APPENDIX D - FLEXIBLE DEPLOYMENT DATA SUBMISSION, COLLECTION, REVIEW, AND ANALYSIS PROCESS



APPENDIX E - SAMPLE FLEXIBLE DEPLOYMENT ASSISTANCE GUIDE TEMPLATE

WIRELINE CARRIER DATA SUBMISSION

Carrier Name **AnyTel**

Contact Person **John Doe**
Telephone Number **703-814-4700**

Switch-specific Information				Deployed Generics										Interceptions			
				Previous -1 n-2		Previous n-1		Current n		Next +1		Next - n+2					
Host and/or Stand-alone CLLI Code or other Unique Identifier	Switch or Equipment Location	County or Wireless Service Area Served	Switch Type	Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed	1996	1997	1998	1999
CHANVAWFDS0	Chantilly, VA	Fairfax [illegible]nty	DMS-100	NA[illegible]9	2/9[illegible]	NA[illegible]0	1/99	[illegible]AO11	12/99	NAO12	11/00	NAO13	10/01	0	2	2	3

WIRELESS CARRIER DATA SUBMISSION

Host and/or Stand-alone CLLI Code or other Unique Identifier	Switch or Equipment Location	County or Wireless Service Area Served	Switch Type	Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed	1996	1997	1998	1999
CHANVAWFCM1	Chantilly, VA	Wash. DC MSA#8	Autoplex 1000	5E10	4/98	5E11	11/98	5E12	6/99	5E13	1/00	5E14	8/00	8	6	6	8

APPENDIX F - FLEXIBLE DEPLOYMENT ASSISTANCE GUIDE TEMPLATE

OMB Control Number: 1110-0030
Expiration Date: June 30, 2000

Carrier Name _____

Contact Person _____
Telephone Number _____

				Deployed Generics													
				Previous -1		Previous		**Current**		Next		Next + 1					
Switch-specific Information				n-2		n-1		**n**		n+1		n+2		**Interceptions**			
Host and/or Stand-alone CLLI Code or other Unique Identifier	Switch or Equipment Location	County or Wireless Service Area Served	Switch Type	Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed	1996	1997	1998	1999

CALEA Implementation Section (CIS)
Attention: Flexible Deployment Assistance Guide
14800 Conference Center Drive, Suite 300
Chantilly, VA 20151-0450