

*Communications Assistance for
Law Enforcement Act - CALEA*

*Flexible Deployment
Assistance Guide*

Third Edition

*Extensions of the June 30, 2002
Missing Capability Compliance Date
and
Further Extensions
of June 30, 2000*



*Department of Justice
Federal Bureau of Investigation
CALEA Implementation Section
May 2002*

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INTRODUCTION

The purpose of this *Third Edition* of the “Communications Assistance for Law Enforcement Act (CALEA) Flexible Deployment Assistance Guide” (Guide) is to further assist telecommunications carriers in meeting certain requirements of CALEA.¹ This Guide continues the implementation efforts of the CALEA Implementation Section (CIS) of the Federal Bureau of Investigation (FBI) with respect to extensions of the June 30, 2002 compliance date for six technical capabilities affirmed by the Federal Communications Commission (FCC)² to be required by CALEA and *further extensions* of June 30, 2000,³ for certain telecommunications carriers. This Guide requests telecommunications carriers voluntarily submit certain information to the FBI, and explains under what circumstances, based on a review of that information, the FBI might support a telecommunications carrier’s request of the FCC to extend the June 30, 2002 compliance date for the six missing capabilities and/or *further extend* June 30, 2000, under Sec-

tion 107(c) of CALEA.⁴ This Guide also provides some general background information regarding CALEA, and discusses lawfully-authorized electronic surveillance, technical solutions developed by the industry, and the cost reimbursement provisions of CALEA.

As explained further in this Guide, telecommunications carriers⁵ are under an obligation to meet CALEA assistance capability requirements by June 30, 2002. This date represents both the recently established compliance date for six missing technical capabilities and the two-year extension period granted by the FCC in response to carriers’ petitions for extensions of June 30, 2000. By implementing Flexible Deployment for both extensions of June 30, 2002, and *further extensions* of June 30, 2000, the FBI intends to use a similar evaluation method as used previously in its Flexible Deployment Program. Carriers choosing to submit information in response to this Guide are strongly encouraged to do so on or before June 12, 2002.

If, after reviewing the information submitted, the carrier and the FBI are able to arrive at a mutually agreeable CALEA deployment schedule, the FBI may support the carrier’s request to the FCC for an extension of June 30, 2002, and/or a *further extension* of June 30, 2000, 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

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); Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999); *USTA v. FBI*, 227 F.3d 450 (D.C. Cir. 2000); and Order on Remand, *Communications Assistance for Law Enforcement Act*, CC Docket no. 97-213 (rel. April 11, 2002).

² On April 11, 2002, the FCC released its Order on Remand, *Communications Assistance for Law Enforcement Act*, CC Docket no. 97-213 (rel. April 11, 2002), regarding four contested and two uncontested technical capabilities and established a June 30, 2002 compliance date. See the Missing Capabilities section of this *Third Edition* Guide for more information.

³ A telecommunications carrier participating in this iteration of the FBI’s Flexible Deployment Program may have already received a two-year extension of June 30, 2000, from the FCC (extending its compliance date to June 30, 2002). The carrier now seeks the FBI’s support of its petition to the FCC for a *further extension* of June 30, 2000, (a *further extension* of June 30, 2000, would be reflective of a carrier’s proposed deployment schedule).

⁴ 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 legal advisors.

⁵ The FCC, in its Third Report and Order, determined that certain telecommunications carriers (i.e., carriers providing wireline local exchange, cellular, and/or broadband Personal Communications Service [PCS]) were required to provide certain core electronic surveillance capabilities by June 30, 2000. See Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket 97-213 (rel August 31, 1999), ¶¶ 35, 36.

On September 21, 2001, the FCC released an Order granting carriers until November 19, 2001, to either come into compliance with, or to seek individual relief of, the packet-mode compliance deadline. See Order, *Communications Assistance for Law Enforcement Act*, CC Docket 97-213 (rel September 21, 2001).

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.⁶ 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 lawful collection of (1) the contents⁷ of communications; and/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 the equipment, facilities, or services 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 confirm the government’s authority to lawfully require providers of communications services to provide law enforcement with the “. . . technical assistance necessary to accomplish the interception . . .”⁸ In the telecommunications environment of that time, only comparatively minor assistance from telephone companies was needed by law enforcement to accomplish the interception (e.g., identity of “access points”). However, 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.

⁶ See Second Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No., 97-213 (rel. August 31, 1999), ¶ 37, n.100.

⁷ Communications “contents” is defined by 18 U.S.C. § 2510(8) as “any information concerning the substance, purport or meaning of that communication.”

⁸ 18 U.S.C. § 2518(4).

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 for criminal investigatory purposes.

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 (e.g., dialed number information) through the use of pen registers and/or through the use of trap and trace devices.

The term *interception* is defined by law and refers to the lawful acquisition of the contents of any wire, electronic or oral communication (e.g., signs, signals, writing, images, sounds, data, or intelligence of any nature) transmitted from one party to another. Authority for initiating an interception is found in Title III of the Omnibus Crime Control and Safe Streets Act or FISA.

The term *pen register* is defined by law and refers to the lawful acquisition of certain outgoing dialing, routing, addressing, or signaling information. Authority for using a pen register is found in 18 U.S.C. § 3123 and 50 U.S.C. § 1842.

The term *trap and trace* is defined by law and refers to the lawful acquisition of dialing, routing, addressing, and signaling information reasonably likely to identify the source of a wire or electronic communication. Authority for using a trap and trace device is also found in 18 U.S.C. § 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 obligations 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 do not have the capability 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.⁹

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.

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

⁹ Section 103 of CALEA, 47 U.S.C. § 1002.

October 25, 1998 - Original CALEA assistance capability compliance date

June 30, 2000 - Extended 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])

November 19, 2001 - Compliance date for packet-mode communications to comply with the assistance capability requirements¹⁰

June 30, 2002 - Compliance date for six missing technical capabilities and/or the two-year extension received by a subset

of all carriers having filed petitions with the FCC requesting extensions of June 30, 2000. The FCC granted shorter extensions to certain carriers in accordance with their proposed deployment schedules.

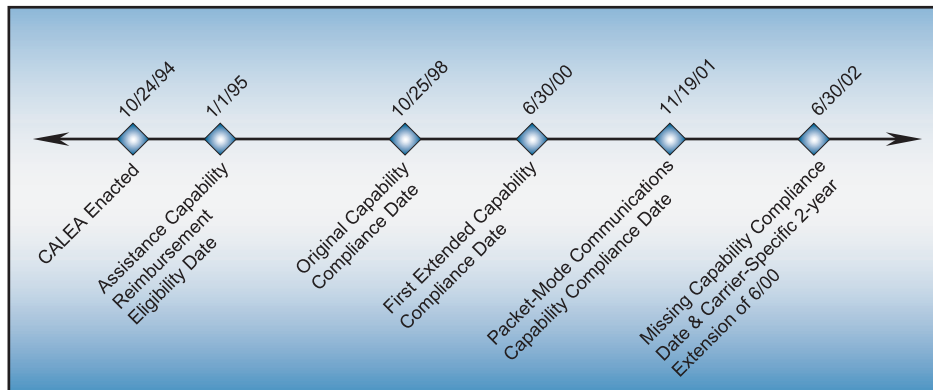


Figure 1 - CALEA Timeline

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

¹⁰ See *supra*, footnote 5.

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.

However, CALEA envisioned the possibility that technical standards would not be developed for (1) carriers to meet the assistance capability requirements of Section 103 or (2) manufacturers and providers of telecommunications support services to satisfy the obligations of Section 106.¹¹ Section 107(a)(3) of CALEA, Absence of Standards, states that "[t]he absence of technical standards for implementing the assistance capability requirements of section 103 shall not . . . relieve a carrier, manufacturer, or telecommunications support services provider of the obligations imposed by section 103 or 106, as applicable."¹²

Core J-Standard

On December 8, 1997, TIA published an interim technical standard¹³ (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 electronic surveillance capabilities intended to provide law enforcement the ability to collect call-identifying information and call content pursuant to lawful authorization regardless of whether the telecommunications are carried in circuit- or packet-mode.

¹¹ Section 106 of CALEA outlines the responsibilities of equipment manufacturers and providers of telecommunications support services.

¹² Section 107(a)(3) of CALEA, 47 U.S.C. § 1006(a)(3).

¹³ 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 requirements compliance date for CALEA, October 25, 1998, was extended by the FCC¹⁴ 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. The FCC subsequently granted certain carriers extensions of June 30, 2000, as a result of carriers seeking individual relief. Extensions granted certain carriers expire on June 30, 2002.

Missing Capabilities

On March 27, 1998, the Department of Justice (DOJ) and the 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 technical capabilities (commonly referred to as "punch list" 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.¹⁵ 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.¹⁶

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

- Content of subject-initiated conference calls,
- Party hold, join, and 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, and
- Dialed digit extraction (post-cut-through dialed digits).

¹⁴ 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.

¹⁵ Third Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999).

¹⁶ 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).

Content of subject-initiated conference calls – permits a law enforcement agency 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, and drop messages – involve features designed to aid a law enforcement agency in the interception of multi-party calls. This capability permits the law enforcement agency to receive from the telecommunications carrier messages identifying the parties to a conversation at all times. The party hold message is provided whenever one or more parties are placed on hold. The party join message reports the addition of a party to an active call or the reactivation of a held call. The party drop message is provided 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 – permits a law enforcement agency 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 is provided for each communication initiated by the subject. This capability requires the telecommunications carrier to deliver a message to the law enforcement agency, informing it that the subject has invoked a feature that places a party on hold, transfers a call, forwards a call, or adds/removes a party to a call.

In-band and out-of-band signaling (notification message) – enables a telecommunications carrier to send a notification message to the law enforcement agency 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 law enforcement agency indicates 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 indicates 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 – requires that a telecommunications carrier send call timing information to the law enforcement agency so that it will be able to associate the call-identifying information with the actual content of the call in cases where the law enforcement agency has obtained authorization to intercept both content and call-identifying information.

Dialed digit extraction (post-cut-through dialed digits) – requires the telecommunications carrier to provide to the law enforcement agency 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.

On August 15, 2000, in the case of *United States Telecom Association, et al., v. FCC*, 227 F.3d 450 (D.C. Cir. 2000) the United States Court of Appeals for the District of Columbia Circuit partially vacated and remanded to the FCC the Third Report and Order. The Court vacated the FCC's decision with respect to four missing technical capabilities: dialed digit extraction; party hold, join, and drop information; subject initiated dialing and signaling; and in-band/out-of-band signaling. The Court's ruling required the FCC to reconsider whether these four missing capabilities were mandated by CALEA and to enter a new decision in accordance with the Court's instructions. The Court did not reverse or remand the FCC's determinations regarding packet-mode communications.

On April 11, 2002, the FCC concluded its deliberations regarding the four missing technical capabilities remanded by the Court. In its Order on Remand, the FCC re-affirmed its previous conclusion that the four missing technical capabilities are required by CALEA. Further, the FCC established June 30, 2002, as the date by which telecommunications carriers must provide these capabilities to law enforcement pursuant to appropriate lawful authorization. With respect to the two remaining, uncontested technical capabilities (i.e., content of subject-initiated conference calls and timing to associate call data to content) the FCC's Order on Remand lifts its previous suspension of the compliance date¹⁷ and mandates these capabilities also be provided by June 30, 2002. Alternatively, telecommunications carriers may seek individual relief and petition the FCC for an extension of this compliance date.

Packet-Mode Communications

The industry-developed technical standard, J-STD-025, provides descriptions of capabilities that wireline local exchange, cellular, and broadband PCS carriers need to make available to law enforcement regardless of the transmission mode (circuit-mode or packet-mode) utilized by carriers when providing service(s).

In its Third Report and Order (released on August 31, 1999), the FCC determined that wireline, cellular, and broadband PCS carriers could provide the capability to intercept packet-mode

¹⁷ See Order, *Communications Assistance for Law Enforcement Act*, CC Docket 97-213 (rel September 21, 2001).

communications in accordance with J-STD-025. The FCC also invited TIA “. . . to study CALEA solutions for packet-mode technology and report to the Commission in one year on steps that can be taken, including particular amendments to J-STD-025 . . .”¹⁸

As a result, TIA convened a series of Joint Experts Meetings (JEM) to study the issue. The final JEM Report, meeting summaries, and technical contributions made to the meetings are available at TIA's Web site: <http://www.tiaonline.org>.

In its Third Report and Order, the FCC mandated that the capability to intercept packet-mode communications be made available to law enforcement by September 30, 2001.¹⁹ In a September 21, 2001 Order,²⁰ the FCC granted carriers until November 19, 2001, to either come into compliance with, or to seek individual relief of, the packet-mode compliance deadline. Packet-mode communications were the subject of the *Second Edition* of the Flexible Deployment Assistance Guide. It is available on the CIS Web site: <http://www.AskCALEA.net>.

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. It also requires the Attorney General to establish necessary regulations to effectuate timely and cost-efficient payment to telecommunications carriers in accordance with those priorities. The reimbursement of carriers for any eligible costs will occur under the provisions of Section 109 of CALEA, and the associated Cost Recovery Regulations,²¹ a firm fixed price agreement,²² or other applicable law, and is in no way affected by a carrier's submission of information in response to this Guide.

¹⁸ Third Report and Order ¶ 55.

¹⁹ Ibid.

²⁰ See *In the Matter of Communications Assistance for Law Enforcement Act*, Order, CC Docket 97-213, FCC 01-265, (rel September 21, 2001).

²¹ CALEA Cost Recovery Regulations, 28 C.F.R. Part 100.

²² Pub. L. 106-246, Div. B, Title II, July 13, 2000, 114 Stat. 542.

The Omnibus Consolidated Appropriations Act of 1997 (Pub. L. No. 104-208)²³ 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.

For more information regarding CALEA-related reimbursement, please refer to either the January 2000, Flexible Deployment Assistance Guide or the August 2001, *Second Edition* of the Flexible Deployment Assistance Guide for Packet-Mode Communications. Both editions are available on the CIS Web site: <http://www.AskCALEA.net>.

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.²⁴ 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.

²³ The Omnibus Consolidated Appropriations Act of 1997; P.L. 104-208, 110 STAT 3009 (1996).

²⁴ 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.

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(s) before the FCC. 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.

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 its Flexible Deployment Program, the FBI would fulfill this consultative role for the Attorney General, by assessing its level of support for the carrier's flexible deployment plan.

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 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 generic upgrade cycle.

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 equip-

ment, facilities, and services²⁵ 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. Equipment, facilities, and services scheduled to be replaced should also be identified by a carrier. Figure 2 shows how law enforcement's priorities can be incorporated into a carrier's normal generic upgrade cycle.

Carriers' Normal Generic Upgrade Cycle

A central element to the FBI's Flexible Deployment Program 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 as-

sociated 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 D for a Sample *Third Edition* Flexible Deployment Assistance Guide Template.

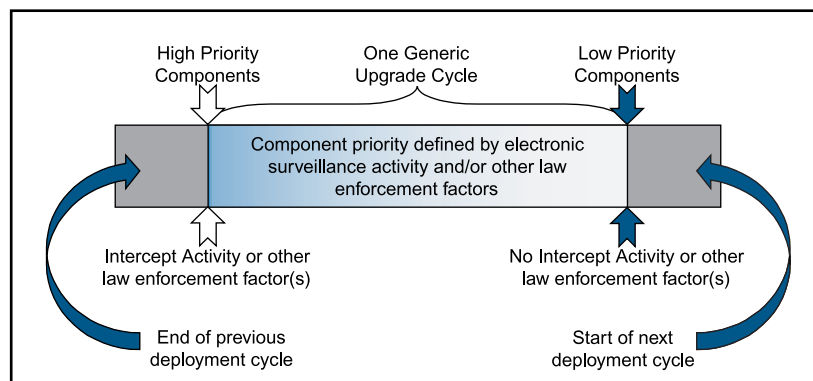


Figure 2 - Law Enforcement Priorities

Under the FBI's Flexible Deployment Program, a carrier's normal generic upgrade cycle will play a role in when CALEA-compliant solutions are to be deployed in a carrier's network. Carriers will develop their deployment cycles based on: (1) the commercial availability of CALEA-compliant 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-

²⁵ In those cases where a carrier has replaced equipment, the carrier should provide historical electronic surveillance information for the area served by the previous equipment.

month deployment cycles shown in Appendix A are illustrative examples of normal generic upgrade cycles. Actual carrier generic upgrade cycles are expected to differ based on the considerations outlined above.

Commercial Availability of Solutions

CALEA-compliant solutions are commercially available on the date a manufacturer first makes its solution available. The FBI recognizes that manufacturers' production cycles may have delayed a particular carrier's ability to deploy CALEA-compliant software in the past. However, the FBI currently understands that most, if not all, manufacturers have made solutions commercially available. Delays in the installation of commercially available solutions may be the result of a carrier's normal generic business cycle, in a carrier's difficulty scheduling installation with a manufacturer, or both. 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.

Section 109(b) of CALEA

In those instances where compliance by a carrier is not reasonably achievable, CALEA provides a remedy under Section 109(b). A carrier may choose to petition the FCC for relief from CALEA's capability requirements with respect to any equipment, facilities, or services on which compliance would not be reasonably achievable. CALEA section 109(b) requires carriers to prove that capability compliance is not reasonably achievable pursuant to one or more of the eleven factors listed in section 109(b)(1). CALEA requires the FCC to notify the FBI of the petition, and make a determination within one year of a carrier's filing. Section 109(b) does not contain any provision for automatic stays of extensions previously granted in response to a carrier's petition filed under section 107(c). 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. The FCC stated that "... it may be necessary to

provide relief under Section 109 only in unusual cases."²⁶ Finally, in its Order on Remand, the FCC stated that "... Section 109 serves as an ultimate check on cost considerations."²⁷

INFORMATION COLLECTION

As stated previously in this Guide, the FBI's Flexible Deployment Program is based on (1) a carrier's normal generic upgrade cycle - necessary to deploy a completely CALEA-compliant solution, and (2) law enforcement priorities. In order for the FBI to make an informed decision regarding a carrier's proposed deployment schedule, a carrier is encouraged to 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.

Table 1 provides a description of the information elements requested in this *Third Edition* of the Guide. The term "component" refers to any switch, other telecommunications equipment, or peripheral piece of telecommunications equipment which would need to undergo modification to be compliant with the requirements of CALEA. Examples of "components" include (but are not limited to) end office switches, network edge devices, and peripheral equipment (e.g., Home Location Registers [HLR]). Additionally, carriers with multiple Filer 499 ID (formerly TRS or Telecommunications Relay Service) numbers must submit an individual Template for each Filer 499 ID number.

A Sample *Third Edition* Flexible Deployment Assistance Guide Template is provided in Appendix D. A blank *Third Edition* Flexible Deployment Assistance Guide Template is provided in Appendix E. Carriers may use the blank form to provide the above described information. An electronic version of this form, prepared in Microsoft Excel®, is also available on the CIS Web site at <http://www.AskCALEA.net/programs/deployment.html>. Carriers may submit electronic versions of the *Third Edition* Flexible Deployment Assistance Guide Template to the following e-mail address: FlexD@AskCALEA.net, or to the facsimile number or U.S postal address provided at the end of this Guide.

²⁶ Second Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999), ¶ 37.

²⁷ Order on Remand, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. April 11, 2002), ¶ 64.

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. Any carrier-provided information marked as proprietary will be treated accordingly by the FBI, and the FBI will enter into an appropriate non-disclosure agreement with any carrier who believes it to be necessary.

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.

Carrier Notification

Upon receipt of a carrier-submitted *Third Edition* Flexible Deployment Template, the FBI will provide the carrier a Receipt Notification Letter. Following the FBI's analysis of carrier-submitted information, the FBI will either: (1) contact the carrier to initiate the process by which it and the carrier can develop a mutually agreeable deployment schedule; (2) provide a letter of support for the carrier's deployment schedule (a copy of the letter of support will also be provided to the FCC); or (3) notify the carrier and FCC that the FBI cannot support that carrier's extension petition. In the event a carrier submits a *Third Edition* Template with the Consultant of Record (COR) fields completed, copies of correspondence will be provided to both the COR and the carrier contact person.

The final determination regarding carriers' extension petitions rests solely with the FCC. The FCC will determine whether or not to grant any carrier's extension petition using the FBI's support as one factor in its decision-making process, and will notify carriers of its decision(s) accordingly.

Carriers unfamiliar with the FCC's process regarding compliance with the assistance capability requirements of section 103 of CALEA and section 107(c) petitions for extensions of the capability compliance date should refer to the FCC's Public Notice, released on September 28, 2001.²⁸ In its Public Notice, the FCC provided instructions for carriers to file petitions for extensions with the FCC. In its Order on Remand, the FCC

directed carriers to follow the procedures outlined in the September 28, 2001 Public Notice.²⁹ Both the Public Notice and Order on Remand can be found at the FCC CALEA-related Web site: <http://www.fcc.gov/calea>.

Paperwork Reduction Act Notice

The FBI has created this *Third Edition* of the Flexible Deployment Assistance Guide and the associated information collection Template (see Appendix E) 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.

This Guide does not contain any substantive or material modifications to the previously approved information collection authorization, and will only update existing requirements for certain telecommunications carriers. In view of this fact, and because the *Third Edition* of the Guide does not change existing requirements for the voluntary submission of information by carriers, the *Third Edition* of the Guide creates no additional paperwork requirements above those already approved by the Office of Management and Budget (control number 1110-0030).

The estimated average time to read this *Third Edition* of the Guide, complete the Template, and file the information is as follows: (1) 1 hour to read the Guide; (2) 2 hours to gather the information to complete the *Third Edition* Template; (3) 1 hour to complete the *Third Edition* Template; (4) 15 minutes to assemble and file the *Third Edition* Template; for a total estimated average time of 4 hours and 15 minutes per *Third Edition* 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.

²⁸ Public Notice, *The Common Carrier and Wireless Telecommunications Bureaus Establish Procedures for Carriers to Submit or Supplement CALEA Section 107(c) Extension Petitions, both Generally and with respect to Packet-mode and other Safe Harbor Standards*, CC Docket No. 97-213, DA 01-2243 (rel. September 28, 2001).

²⁹ Order on Remand, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. April 11, 2002), ¶ 128.

Table 1 - Flexible Deployment Information Elements

Data Type	Description
Carrier Name	The name of the telecommunications carrier that owns the identified component (e.g., switch, other telecommunications equipment, or peripheral telecommunications equipment.) This name will appear on all correspondence between the FBI and carrier.
Filer 499 ID (formerly TRS or Telecommunications Relay Service) Number	The Filer 499 ID (formerly TRS or Telecommunications Relay Service) number assigned by the National Exchange Carrier Association (NECA). If the Filer 499 ID number is unknown, contact NECA (973-560-4460) to obtain. Carriers with multiple Filer 499 ID numbers must submit an individual Template for each Filer 499 ID number.
Contact Person, Telephone, and Facsimile Number	The name, telephone, facsimile number, and physical address of a person the FBI can contact in the event questions arise with the submitted data.
Consultant of Record (COR) Information	The name of the consulting or law firm; name of a contact person providing the requested information; and the physical address, telephone, and facsimile number of the COR, if applicable. A carrier may designate only one COR. A COR will be contacted in the event that questions arise regarding submitted information.
CLLI Code or Other Identifier	Common Language Location Identifier or other unique component identification. Component-specific CLLI Codes are eleven characters long (e.g., CHANVAWFDS0).
Component Location	The city and state where the component is located.
Manufacturer and Component Type	The manufacturer and type of host or stand-alone component identified by each CLLI Code. For example: Lucent 5ESS, Motorola EMX-2500, Nortel DMS-MTX, Siemens EWSD. Only in the event that a remote device needs to be upgraded, include the remote device type and corresponding host.
Service Area(s)	The name(s) of the counties, market service areas, or other appropriate geographic areas where service is provided by each identified component. In the event that a component serves multiple areas, each area (county, market service area, or other appropriate geographic area) should be identified. For components 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 the submission date of the carrier's completed Template on the component identified by each CLLI Code. For example: 5E14, NAO12, MTX-10. This generic needs to be accompanied by a deployment date.
Historical Software Deployment Dates	Previous software generic deployment dates to establish an individual carrier's normal generic upgrade cycle. Every identified generic needs to be accompanied by a date, and every date needs to be accompanied by a generic.
Future Planned Software Generic Deployment Dates	The future planned software generic, and deployment dates, to be installed in the identified switch or equipment. Every identified generic needs to be accompanied by a date, and every date needs to be accompanied by a generic.
Historical Intercept Activity	Number of lawfully-authorized electronic surveillance intercepts (i.e., communications content, pen registers, and traps and traces) conducted on each identified component by a municipal, county, state, or federal law enforcement agency for the years 1998, 1999, 2000, and 2001. Please provide an integer for each available space. If no intercept activity occurred during a given year, include a zero (0).

ADDITIONAL TECHNOLOGIES

FCC's Second Report and Order

The FCC examined the definition of "telecommunications carrier" set forth in Section 102 of CALEA in its Second Report and Order³⁰ regarding 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,³¹ 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;³²
- 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, to the extent they offer PMRS services;
- Pay telephone providers; and
- Information service providers that exclusively provide information services.

³⁰ Second Report and Order, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. August 31, 1999).

³¹ 47 U.S.C. § 153(10).

³² See Second Order on Reconsideration, *Communications Assistance for Law Enforcement Act*, CC Docket No. 97-213 (rel. April 16, 2001), ¶¶ 37, 38.

ADDITIONAL INFORMATION

How and Where to Provide Flexible Deployment Assistance Guide Information

Carriers can download an electronic version of the *Third Edition* Flexible Deployment Assistance Guide Template from the CIS Web site at <http://www.AskCALEA.net/programs/deployment.html>. The Flexible Deployment Assistance Guide page is available by selecting the Flexible Deployment hyperlink.

Carriers that do not have access to the Internet and wish to acquire the *Third Edition* Flexible Deployment Assistance Guide Template in electronic form can request a 3.5 inch diskette containing the electronic Template from the address and/or telephone listed below. Carriers may either submit a completed *Third Edition* Template in electronic form (e.g., Microsoft Excel®) or use the *Third Edition* Template provided in Appendix E of this Guide. Carriers are strongly encouraged to file *Third Edition* Templates by June 12, 2002. Multiple submissions (i.e., electronic and hardcopy) are not necessary and should not be submitted. All completed *Third Edition* Templates should be sent to **only one** of the following:

Electronic submissions of the *Third Edition* Flexible Deployment Assistance Guide Template may be made to:

FlexD@AskCALEA.net

Carriers are requested to include the phrase "*Third Edition*" in the subject line of the e-mail.

Facsimile submissions of the *Third Edition* Flexible Deployment Assistance Guide Template may be made to:

703-814-4750

Carriers are requested to include the phrase "*Third Edition*" on the cover sheet of the facsimile.

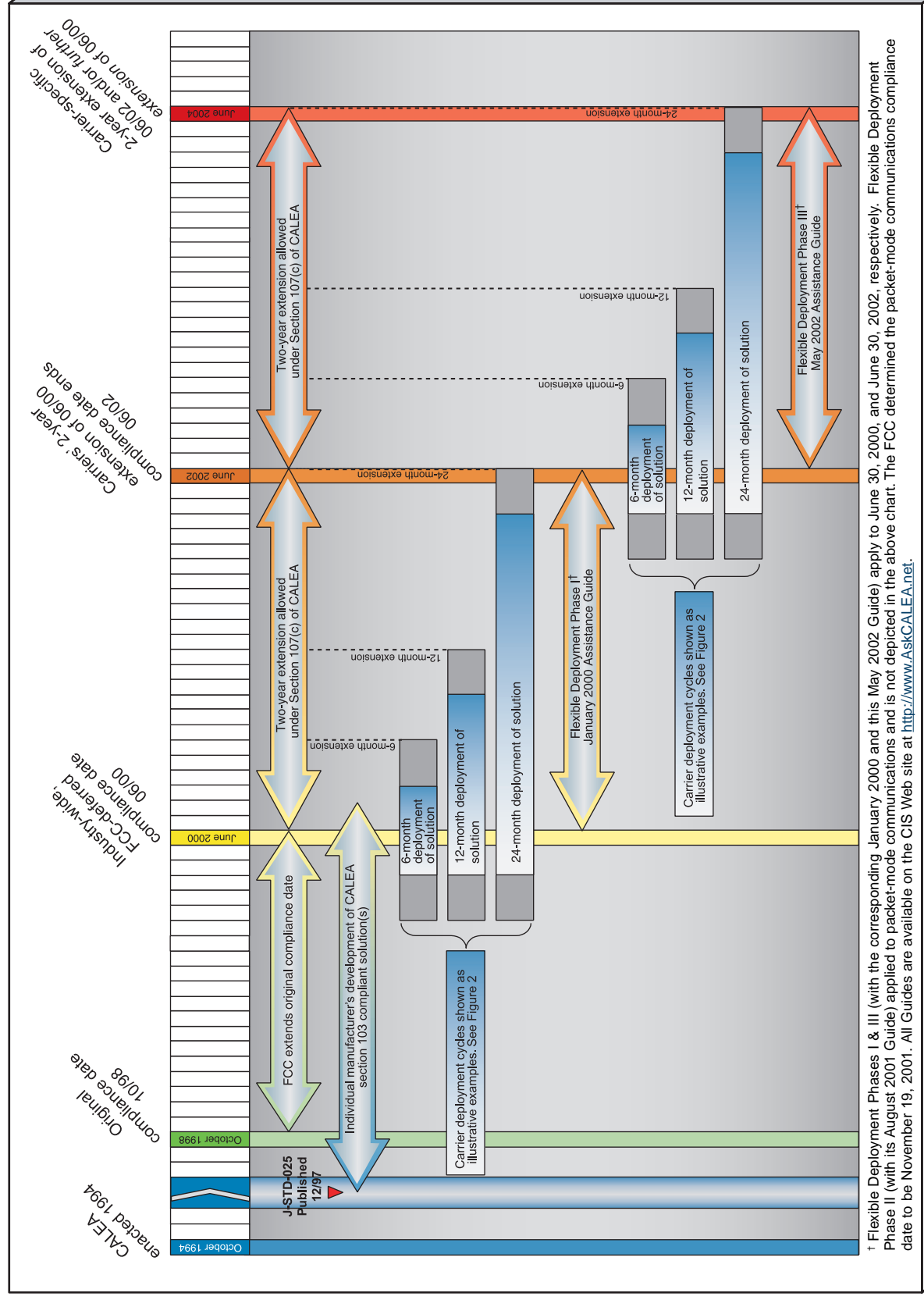
Postal delivery submissions of the *Third Edition* Flexible Deployment Assistance Guide Template may be made to:

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

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

800-551-0336

APPENDIX A — CALEA CAPABILITY DEVELOPMENT, COMMERCIAL AVAILABILITY, AND CARRIERS' GENERIC UPGRADE CYCLES



APPENDIX B — FREQUENTLY ASKED QUESTIONS

Q Why has the FBI published this *Third Edition* Flexible Deployment Assistance Guide?

A The FBI's original Flexible Deployment Assistance Guide, published in January 2000, allowed carriers the opportunity to submit certain information for the FBI's consideration regarding a carrier's petition before the FCC to extend June 30, 2000. This *Third Edition* of the FBI's Flexible Deployment Assistance Guide is intended to assist carriers submitting petitions to the FCC for extensions of the six missing technical capabilities June 30, 2002 compliance date or *further extensions* of June 30, 2000.

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

A As described in the "Information Collection" section of this Guide, a carrier should provide the name of a contact person, their telephone and fax numbers, and address, as well as the following component-specific information: (1) CLLI Code or other unique component identifier; (2) component location; (3) service area(s); (4) current software generic; (5) historical software generic deployments and corresponding deployment dates; (6) future planned software generic deployments and corresponding dates; and (7) historical intercept activity. In the event that a carrier chooses to make use of a consultant or law firm, the template should include: (1) the name of the consultant of record (COR); (2) the COR company name; (3) COR address; and (4) COR telephone and fax numbers. **Additionally, carriers with multiple Filer 499 ID (formerly TRS or Telecommunications Relay Service) numbers must submit an individual template for each Filer 499 ID number.**

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

A No. There is no legislative, regulatory, or other mandate for carriers to provide the information outlined in this Guide. Submission of information to the FBI's Flexible Deployment Program is voluntary. However, the FBI will not be in a position to provide its support for any carrier's petition without specific solution deployment information.

Q Does a carrier have to request an extension from the FCC in addition to submitting a *Third Edition* Flexible Deployment Assistance Guide Template to the FBI?

A Yes. Carriers must submit a request to the FCC and provide a copy of that request to the FBI. Only the FCC has the authority to grant a carrier's petition.

Q If a carrier provides the FBI a copy of its petition to the FCC (including a *Third Edition* Template), is this sufficient for participation in Flexible Deployment?

A No. The *Third Edition* Template must be submitted to the FBI as a stand-alone document by e-mail, facsimile, or postal mail as described in the "Additional Information" section of this Guide.

Q Will filling out the *Third Edition* Template ensure that a carrier receives an extension of the assistance capability requirements compliance date(s)?

A No. If the FBI, with the aid of the law enforcement community, determines that a carrier's proposed deployment schedule is consistent with law enforcement priorities, it may provide support for the carrier's petition under Section 107(c) of CALEA. The FCC decides whether or not to grant any carrier's petition.

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

A Upon receipt of carrier-submitted Flexible Deployment information, the FBI will provide the carrier (and consultant of record) a Receipt Notification Letter. (*A copy of that letter may accompany the carrier's extension petition to notify the FCC of the carrier's participation in this phase of Flexible Deployment.*) Following the FBI's analysis of carrier-submitted information, the FBI will either: (1) contact the carrier (or consultant of record) to develop a mutually agreeable deployment schedule; (2) provide a letter of support for the carrier's deployment schedule; or (3) notify the carrier and FCC that the FBI cannot support that carrier's extension petition.

Q Where can a carrier get more information regarding the FBI's Flexible Deployment Program?

A The CALEA Implementation Section of the FBI maintains a website (<http://www.AskCALEA.net>) to provide carriers information regarding CALEA. Electronic versions of this Guide, as well as the information submission Template, are available on the AskCALEA website.

APPENDIX C — GLOSSARY¹

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 – the “contents” of a communication is defined by 18 U.S.C. § 2510(8) as “any information concerning the substance, purport, or meaning of that communication.” The phrase “call content” used in this Guide refers to the contents of 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, photoelectric, 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 and/or acquisition of call-identifying information. The telecommunications service targeted for electronic surveillance includes all of the services and features associated with the subject’s facilities, equipment and services, as specified in a court order or lawful authorization.

Interception – defined in 18 U.S.C. § 2510(4) as the acquisition of the contents of a communication through the use of a device. See Electronic Surveillance above.

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

J-STD-025A – industry interim technical standard developed to meet the assistance capability requirements of Section 103 of CALEA, including those capabilities determined by the FCC to be required by CALEA, published in May 2000.

¹ This Glossary is provided herein solely for the assistance of the reader.

APPENDIX C — GLOSSARY (cont'd)

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.

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

Packet Mode Communications – defined in the FCC's Third Report and Order as "a communication where individual packets or virtual circuits of a communication within a physical circuit are switched or routed by the accessing telecommunication system. Each packet may take a different route through the intervening network(s)" (Third Report and Order, & 6).

Pen Register – see generally 18 U.S.C. § 3121, et seq. Pursuant to these provisions, a law enforcement agency can be authorized to acquire certain outgoing dialing, routing, addressing, or signaling information.

Title III – the provision of the Omnibus Crime Control and Safe Streets Act of 1968 (Pub. L. No. 90-351, 82 Stat. 212) that, among other things, governs the conduct of lawful interceptions.

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 – see generally 18 U.S.C. § 3121, et seq. Pursuant to these provisions a law enforcement agency can be authorized to acquire certain dialing, routing, addressing, and signaling information.

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 D — SAMPLE THIRD EDITION FLEXIBLE DEPLOYMENT ASSISTANCE GUIDE TEMPLATE

APPENDIX E — *THIRD EDITION* FLEXIBLE DEPLOYMENT ASSISTANCE GUIDE TEMPLATE

OMB Control Number: 1110-0030
Expiration Date: April 30, 2003

Carrier Name	AnyTel
Filer 499 ID	123456
Contact Person	John Doe
Address	14800 Conference Center Drive, Suite 300
City, State, Zip	Chantilly, Virginia 20151
Telephone Number	703-814-4700
Fax Number	703-814-4750

If Applicable:

Consultant of Record (COR)

COR Company Name

COR Address

COR City, State, Zip

COR Telephone Number

COR Fax Number

[illegible]

Please email this form to FlexD@AskCALEA.net (please include "Third Edition" in subject line)
or fax to (703) 814-4750 (please include "Third Edition" on cover sheet)

APPENDIX E — THIRD EDITION FLEXIBLE DEPLOYMENT ASSISTANCE GUIDE TEMPLATE

OMB Control Number: 1110-0030
Expiration Date: April 30, 2003

Carrier Name _____
 Filer 499 ID _____
 Contact Person _____
 Address _____
 City, State, Zip _____
 Telephone Number _____
 Fax Number _____

If Applicable:

Consultant of Record (COR) _____
 COR Company Name _____
 COR Address _____
 COR City, State, Zip _____
 COR Telephone Number _____
 COR Fax Number _____

Component Specific Information			Deployed Generics					Next + 1 n+2		Interceptions					
			Previous -1 n-2	Previous n-1	Current n	Next n+1									
Unique Identifier or CLLI Code or Other	Component Location	Service Area(s) Served	Manufacturer & Component Platform	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed	1998	1999	2000	2001
	City			ST											

Please email this form to FlexD@AskCALEA.net (please include "Third Edition" in subject line)
 or fax to (703) 814-4750 (please include "Third Edition" on cover sheet)

***CALIEA Implementation Section
Attention: Third Edition Flexible Deployment Assistance Guide
14800 Conference Center Drive, Suite 300
Chantilly, Virginia 20151-0450***