



## CALEA System Security and Integrity (SSI) Policies & Procedures Plan – Checklist

<b>Guidance for compliance with the Commission’s Rules</b>
<p>The purpose of the checklist below is to help filers ensure that their CALEA SSI Plan complies with the Commission’s rules to avoid the need to resubmit another SSI Plan in the CALEA Electronic Filing System (CEFS). This first page provides general information, and the checklist begins on the second page.</p> <ul style="list-style-type: none"> <li>• We strongly recommend that filers review the Commission’s rules at 47 CFR § 1.20003 - 1.20005.</li> <li>• The CEFS User Manual includes detailed instructions for access to CEFS and filing System Security and Integrity (SSI) Plans and can be found here: <a href="https://www.fcc.gov/cefs/user-manual">https://www.fcc.gov/cefs/user-manual</a>.</li> <li>• Be sure to submit finalized SSI Plans. Filers submitting drafts will be asked to resubmit the SSI Plan in final form.</li> <li>• Also, please note that CEFS sessions time out after 30 minutes.</li> </ul>
<b>New Plans</b>
<p>There is no requisite format for SSI Plans. The checklist below provides guidance in following the Commission’s rules.</p> <ul style="list-style-type: none"> <li>• The Commission’s rules (47 CFR 1.20003 - 1.20005) require specific information to be included in an SSI Plan.</li> <li>• The Commission’s rules also require that the designated CALEA point of contact information (24 hours per day x 7 days a week) be submitted in a separate appendix to the SSI policies and procedures plan document.</li> </ul>
<b>Amended Plans</b>
<p>Please note that filers updating previously-filed SSI Plan are required to submit a complete SSI Plan, and not just the updated section.</p> <ul style="list-style-type: none"> <li>• For an SSI Plan submission to be considered complete and current, the SSI Plan update must include pages with both the changed information included in the document as well as all the other pages that remain unchanged from the previous SSI Plan.</li> <li>• Filers submitting amended SSI Plans consisting of only an Appendix or other selected pages with changed information will receive a request to resubmit so that a complete and current SSI Plan is on file.</li> <li>• Once you have filed an SSI Plan in CEFS, you can log back into the system to view your past electronic filings. You can only view past electronic SSI filings for the FRN associated with your FCC User Registration.</li> </ul>
<b>CEFS: Filing an SSI Plan</b>
<p><b>A complete SSI Plan submission to CEFS will consist of fields filled out in the database (e.g., do not type in “see attached”) and include at least one attachment.</b></p> <ol style="list-style-type: none"> <li>1. <i>Required.</i> The SSI Plan document describes CALEA policies and procedures, and may include any examples of records, e.g., Record of Authorized Interception, Record of Unauthorized Interception, Example of Court Order). See 47 CFR 1.20003 - 1.20005.</li> <li>2. <i>Required.</i> A separate appendix to the policies and procedures document per rules that includes the designated CALEA employee Point of Contact (POC), including information to reach the POC 24 hours/7 days per the Commission’s rules. See 47 CFR 1.20003(b)(4).</li> <li>3. Other attachments may include a separate cover letter or cover sheet, and/or a request for confidential treatment.</li> <li>4. <i>Requests for confidential treatment:</i> Under 47 C.F.R. § 0.459, if requesting confidential treatment, such requests must identify the specific information for which confidential treatment is sought. For Guidance, see CALEA webpage for Frequently Asked Questions: <a href="https://www.fcc.gov/calea">https://www.fcc.gov/calea</a>.</li> <li>5. <i>File Name.</i> Before uploading your SSI Plan to CEFS, be sure to include the following descriptive elements in the file name: "XYZ Company System Security and Integrity Plan" or "XYX Company SSI Plan."</li> </ol>



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<input checked="" type="checkbox"/>	<b>Checklist for SSI Plan submission</b>	<b>Guidance</b>
<input type="checkbox"/>	<i>Cover letter or Cover sheet to SSI Plan:</i> Name of Carrier and business address, and any relevant identifier (e.g., FRN))	Cover Letters to be filed in CEFS may be addressed to: Federal Communications Commission ATTN: Public Safety and Homeland Security Bureau 45 L Street NE Washington, DC 20554
<input type="checkbox"/>	<i>Cover letter or Cover sheet to SSI Plan:</i> Specify if SSI Plan is New or Amended	If Amended Plan, include effective date of SSI Plan.
<input type="checkbox"/>	<i>Cover letter or Cover sheet to SSI Plan:</i> If Affiliates are involved...	For the submitted SSI Plan, list all applicable entities. If an entity is conducting business under a name that is different than its legal name, include all relevant trade names.
<input type="checkbox"/>	<i>Cover letter or Cover sheet to SSI Plan:</i> If requesting confidential treatment, such requests must address the substantive criteria in section 0.459(b) of the Commission’s rules.  If requesting confidential treatment, such requests must identify the <u>specific</u> information for which confidential treatment is sought.	See 47 CFR 0.459(b).  Additional guidance can be found on the FCC webpage: <a href="https://www.fcc.gov/document/eb-issues-reminder-about-acceptable-confidentiality-requests">https://www.fcc.gov/document/eb-issues-reminder-about-acceptable-confidentiality-requests</a>  <a href="https://www.fcc.gov/document/instructions-regarding-submission-confidential-materials">https://www.fcc.gov/document/instructions-regarding-submission-confidential-materials</a>
<input type="checkbox"/>	<i>SSI Plan document:</i> Describe policies and procedures for employee supervision and control.	See 47 CFR § 1.20003 - Policies and procedures for employee supervision and control. <input type="checkbox"/> 1.20003(b)(4)(i) Name of senior officer or employee responsible for CALEA and job description of that person. <input type="checkbox"/> 1.20003(b)(4)(ii) How to reach contact person(s) 24/7 (e.g., telephone and email address).
<input type="checkbox"/>	<i>SSI Plan document:</i> Describe policies and procedures relating to authorization.  The SSI Plan should comprise of the policies and procedures the carrier uses to comply with CALEA requirements, and may include general policies for electronic surveillance (but does not need to be limited to), e.g., definitions, appropriate legal and carrier authorization, processing of subpoenas/court orders, interception of Communications (wiretaps); Access to Call-Identifying Information (pen registers, and traps and traces); Exigent or Emergency Circumstances, etc.	<input type="checkbox"/> 1.20003(b)(1) Statement that carrier personnel must receive appropriate legal authorization and appropriate carrier authorization <u>before</u> enabling law enforcement officials to implement an interception <input type="checkbox"/> 1.20003(b)(2) Interpretation of phrase “appropriate authorization” to include “appropriate legal authorization” and “appropriate carrier authorization.”



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<input type="checkbox"/>	<p><i>SSI Plan document:</i> Describe record retention policies and procedures, e.g., specific duration for how long records are retained.</p>	<input type="checkbox"/> 1.20003(b)(3) A detailed description of how long it will maintain its records of each interception of communications or access to call-identifying information pursuant to § 1.20004.
<input type="checkbox"/>	<p><i>SSI Plan document:</i> Describe policies and procedures for handling the discovery of unlawful electronic surveillance and any compromises of lawful interceptions or access to call-identifying information any unauthorized person and reporting to Law enforcement agencies (LEA).</p>	<input type="checkbox"/> 1.20003(c) Carrier will report any security breaches to affected LEAs within a reasonable time.
<input type="checkbox"/>	<p><i>SSI Plan document:</i> Describe policies and procedures regarding maintaining secure and accurate records.</p>	<p>See § 1.20004 Maintaining secure and accurate records</p> <input type="checkbox"/> 1.20004(a)(1) Record of each interception/access to call-identifying information include: -Telephone number or circuit ID -Start date and time -Name of law enforcement officer presenting the authorization -Name of person signing the authorization -Type of interception or access (pen register, trap and trace, -Title III, FISA, etc.) -Name of carrier personnel responsible for oversight (2)Signature of responsible carrier personnel (3) certification must be compiled with within reasonable time after the initiation of the interception of the communications or access to call-identifying information.
<input type="checkbox"/>	<p><i>Separate Appendix to policies and procedures document:</i> Per the rules, the SSI Plan should include a separate appendix to the policies and procedures document with the 24/7 contact information for the designated CALEA point of contact.</p>	<p><b>§ 1.20003 Policies and procedures for employee supervision and control</b>                  (b)(4) <u>In a separate appendix to the policies and procedures document:</u>  <input type="checkbox"/> (i) The name and a description of the job function of the senior officer or employee appointed pursuant to paragraph (a) of this section; and  <input type="checkbox"/> (ii) Information necessary for law enforcement agencies to contact the senior officer or employee appointed pursuant to paragraph (a) of this section or other CALEA points of contact on a seven days a week, 24 hours a day basis.  <input type="checkbox"/> Include specific POC information (e.g., phone number/email address of the 24/7 point of contact).</p>