

**Non-Substantive Change Request
(OMB Control Nos. 3060-0917, 3060-0918 and 3060-0862)**

Purpose. The Federal Communications Commission submits this non-substantive change request to require electronic filing of certain required submissions using a Communications Assistance to Law Enforcement Act (CALEA) Electronic Filing System (CEFS). The CALEA information collection is currently approved under OMB control no. 3060-0809. This non-substantive change from paper filing to electronic filing also requires approval for non-substantive changes to three other general Commission information collections (OMB control nos. 3060-0917, 3060-0918, and 3060-0862) described below.

Description of CALEA Electronic Filing System Change. The CEFS allows entities to file their System Security and Integrity (SSI) Plans required by CALEA. The authority for this information collection is found at 47 U.S.C. §§ 1004 and 229(b)(3), and 47 CFR §§ 1.20003, 1.20004, and 1.20005.

The CALEA information collection approval, OMB control no. 3060-0809, authorizes three categories of collection: 1) petitions for extension of time to comply filed under 47 U.S.C. § 1006(c); 2) technical impossibility and cost recovery petitions filed under 47 U.S.C. § 1008(b); and 3) SSI recordkeeping and SSI Plans under 47 U.S.C. § 1004. This non-substantive change will only affect the SSI Plan portion of the collection under 47 U.S.C. § 1004.

The CEFS will automate the SSI Plan filing process currently required by statute and rule. CALEA and the Commission's rules require telecommunications carriers, facilities-based broadband Internet access providers, and providers of interconnected Voice over Internet Protocol (VoIP) service to file SSI Plans, and a Commission rule requires telecommunications carriers to file new plans whenever there is a change in relevant information.¹ CALEA also requires the Commission to review filed SSI Plans to confirm that they comply with Commission requirements.² CALEA requires a telecommunications carrier to file a corrected SSI Plan if the Commission deems a filing deficient.³ Currently, these submissions are filed in paper form delivered by mail or courier.

The CEFS presents a public-facing web form containing data entry fields for collection of key portions of the required data. This web form will help ensure filers supply necessary information in their SSI Plans. Use of the form will reduce the time burden imposed on the Commission and the responders when deficient paper SSI plans must be returned to responders for correction. The CEFS will also ask users to upload their entire integrated SSI Plan document in Word or PDF format to ensure the Commission's records remain as complete as they were prior to CEFS. Moving to the automated CEFS for SSI Plan submission replaces a cumbersome and space-consuming paper process, streamlines the review process using a web-based checklist system,

¹ 47 U.S.C. § 229(b)(3); 47 CFR § 1.20005(a).

² 47 U.S.C. § 229(c); 47 CFR § 1.20005(b).

³ 47 CFR § 1.20005(b)(1).

and enhances recordkeeping and retrieval capabilities. This non-substantive change will reduce the paperwork time burden on both regulated entities and Commission staff resources.

Impact on CORES Information Collections. The transition to CEFS affects both (a) the filing of new regulated entity registrations in the Commission Registration System (CORES) and (b) the filing of updates to CORES registrations. These registrations and updates both are currently approved information collections, OMB control nos. 3060-0917 and 3060-0918. The authority for these information collections is found at 31 U.S.C. § 3701 *et seq.* and 47 CFR § 1.8001.

To electronically file SSI Plans, entities will be required to have FCC User Registrations and an FCC Registration Number (FRN) both of which are obtained when registering in CORES. CORES registration ensures that Commission applicants receive any refunds due, enables the Commission to service public inquiries, and ensures that the Commission complies with the Debt Collection Improvement Act of 1996. Entities must obtain an FCC User Registration and FRN by registering in CORES before conducting a wide variety of business transactions before the Commission. Entities with outdated registrations must update them before they conduct new business with the Commission. Currently, the CORES registration and the CORES update information collections apply to approximately 85,000 respondents annually that conduct business with the Commission.

The Commission estimates that most entities currently required to file SSI Plans either already have CORES registrations or will otherwise need to obtain one for transacting other business before the Commission. Therefore, requiring CORES registrations or CORES updates for entities filing or updating SSI Plans electronically will impose minimal additional burden on regulated entities.

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Impact on Requests for Confidential Treatment of Information. Filers submitting paper SSI Plans typically request confidentiality for the documents under Commission rule 0.459 and provide written explanations of why a record should be withheld from public inspection. This information collection is currently approved by control no. 3060-0862, and the authority for this information collection is found at 5 U.S.C. § 552(b), 18 U.S.C. § 1905, 47 U.S.C. § 154(i), and 47 CFR § 0.459.

If a filer seeks confidentiality for its SSI Plan under Commission rule 0.459, the CEFS web interface requires the filer to upload a narrative justification for confidential treatment. This relieves filers of the burden of producing and mailing paper requests for confidential treatment of SSI Plans.

There are no increases in the burdens and no costs are associated with this information collection.