CALEA ELECTRONIC FILING SYSTEM (CEFS) USER MANUAL

FEDERAL COMMUNICATIONS COMMISSION

45 L Street NE, WASHINGTON, DC 20554

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1. Introduction

The Communications Assistance for Law Enforcement Act (CALEA) governs the technical aspects of wiretapping. CALEA requires covered entities to implement certain technical capabilities into their networks (outlined at 47 U.S.C. § 1002) to ensure that when they are served with a court order for lawful surveillance, their networks can isolate communications identified in the court order, and deliver the communications to the law enforcement agency named in the order. Under 47 U.S.C. § 1004, telecommunications carriers are required to establish protocols to ensure they can provide those wiretaps while simultaneously safeguarding the security and integrity of their systems to prevent unauthorized intercepts of customer communications.

Covered entities must submit System Security and Integrity Policies and Procedures document (SSI Plans) disclosing their compliance with CALEA pursuant to 47 CFR § 1.20005. Such filings must be made upon the launch of any CALEA-covered service. Updated SSI Plans also must be submitted to the FCC within 90 days after changes to an entity's ownership, personnel, or policies. Changes impacting SSI Plans require entities to file a complete updated SSI Plan. Partial updates to certain pages of prior SSI Plans require a complete updated SSI Plan to be filed, and may not be submitted as amendments to prior plans.

SSI Plans filed with the CALEA Electronic Filing System (CEFS) will be the same as SSI Plans traditionally filed via paper. Filers should prepare their SSI Plan as an electronic word or pdf document to upload in the CEFS system. The SSI Plans should identify all the required information, policies, procedures, and recordkeeping actions described in 47 CFR §§ 1.20003 and 1.20004. Carriers will also be asked to cut and paste or summarize certain descriptions from their SSI Plans into a data entry field as part of the CEFS filing process.

Once submitted, filers will be able to log back in to CEFS to review their prior CEFS-filed SSI Plans and ensure they are current. Access to past-filed SSI Plans is restricted by FCC Registration Number (FRN), so that only the FCC User Registrations formally associated with an FRN will be able to view past SSI Plans filed for that entity in CEFS.¹

The CEFS utilizes existing FCC IT Platforms to create an online filing system that is an efficient tool for accepting, reviewing, and approving SSI Plans disclosing covered entities' policies and procedures for complying with CALEA. Development of the CEFS furthers the FCC's goal to migrate to paperless reporting, thereby reducing reporting burdens for the covered entities.

2. Getting Set Up

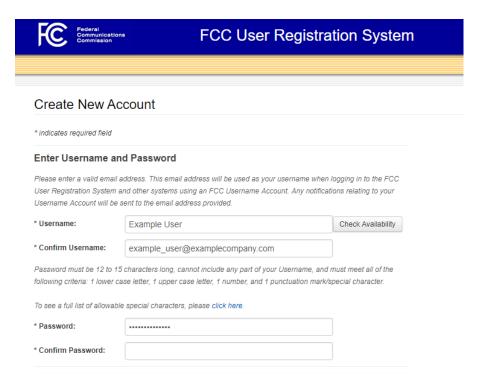
2.1 First Time CEFS Users Without an Existing FCC User Registration

If the filer does not already have an FCC User Registration, an account for the filer must be created prior to logging into CEFS.

Go to the FCC User Registration System link:

https://apps2.fcc.gov/fccUserReg/pages/createAccount.htm. The Create Account screen, shown below, should appear. Enter all required information and select the Create Account button at the bottom of the screen.

¹ For additional information, refer to Universal Licensing System (ULS) Resources Frequently Asked Questions: https://www.fcc.gov/uls-frequently-asked-questions (last visited on November 8, 2021).



2.2 First Time CEFS Users Without an Associated or Existing FCC Registration Number

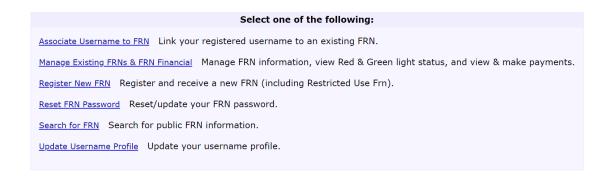
To use CEFS, the FCC User Registration must be associated with the FCC Registration Number (FRN) of the entity for which the SSI Plan is being filed.

If the FCC User Registration is not associated with the filing entity's FRN, or if the filing entity does not have an FRN, go to the following link to access the Commission Registration System (CORES) and login with your FCC User Registration² where prompted:

https://apps.fcc.gov/cores/userLogin.do

Once logged in to CORES, select the either the option to "Associate Username to FRN" or "Register New FRN" as shown below and follow the instructions.

² For additional information, refer to FCC Registration Frequently Asked Questions (last visited on Nov. 8, 2021).

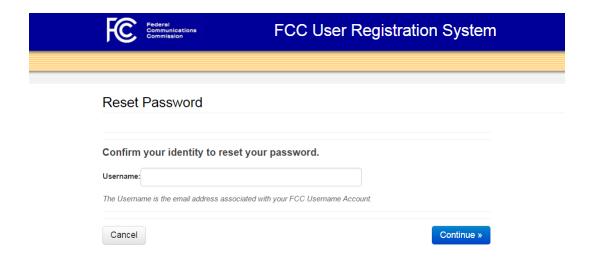


2.3 Resetting Lost FCC User Registration Passwords

To change your FCC User Registration login password, go to the following link:

https://apps2.fcc.gov/fccUserReg/pages/reset-passwd-identify.htm

This will take you to the Reset Password screen:



Enter the email address associated with your FCC User Registration account and press the "Continue" button, then follow the instructions.

3. Accessing CEFS

3.1 Locating CEFS

To locate the CEFS application:

- 1. Go to the FCC homepage (https://www.fcc.gov/).
- 2. Click on the Browse by Category menu located at the top of the page. Note: This menu allows users to view six separate drop down menus.
- 3. Click on Licensing & Databases, shown here:



4. Click on the CEFS link, which will appear among the list of databases:

tions	Licensing & D	atabases	Repo	rts & Research	News & Events	For Cor
	ASR	DIRS		ETRS	MyIBFS	TCB
	CDBS	EA		GenMen	NORS	TCNS
		ECFS		HAM	PIF	ULS
	COALS	EDOCS		KDB	PSIX-ESIX	VPD
	CORES	ELS		KIDVID	RLD	
	CSRS	ETFS		LMS	SADCS	

Note: As an alternate to steps 1-4, one can also access CEFS by clicking or inserting the following URL into a browser: https://www.fcc.gov/licensing-databases/fcc-user-login

3.2 Logging In to CEFS

Selecting the FCC CEFS link connects the user to the CEFS FCC page, shown here:

About the FCC Proceedings & Actions Licensing & Databases Reports & Research News & Event

For Consumers

Home / Public Safety /

CALEA Electronic Filing System (CEFS)

The Communications Assistance for Law Enforcement Act (CALEA) requires telecommunications carriers to ensure they are able to comply with lawful requests for wiretaps made by duly authorized law enforcement officials. All service providers subject to CALEA must have a current System Security and Integrity Policies and Procedures document (SSI Plan) on file with the Commission, and must update their SSI Plans following a change in those plans or a merger or divestiture

The CALEA Electronic Filing System (CEFS) allows regulated entities to file their new or updated SSI Plans electronically, along with their requests for confidential treatment of SSI Plans.

At the bottom of that page will be a link to enter CEFS and file your SSI Plan. Click that CEFS link and you will reach the following screen:

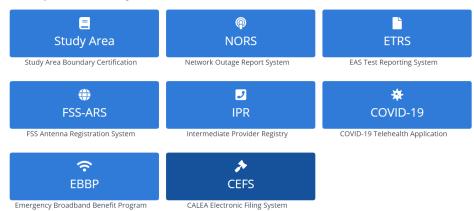
Sign-in

Use of This System is for FCC-Authorized Purposes Only.

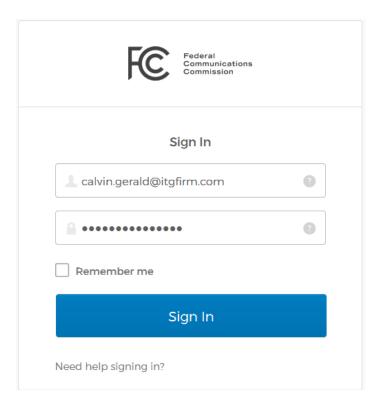
You are accessing a U.S. Government Information System. Information system usage may be monitored, recorded, and subject to audit. Unauthorized use of the information system is prohibited and subject to criminal and civil penalties. Use of the information system indicates consent to monitoring and recording.

- To register for a FCC username account, licensees should follow the instructions provided here: https://apps.fcc.gov/cores/html/Register_New_Account.htm.
- To associate the user account with an FRN, licensees should follow the instructions provided here: https://apps.fcc.gov/cores/html/Associate_Username_to_FRN.htm

Please select a system below to sign-in.

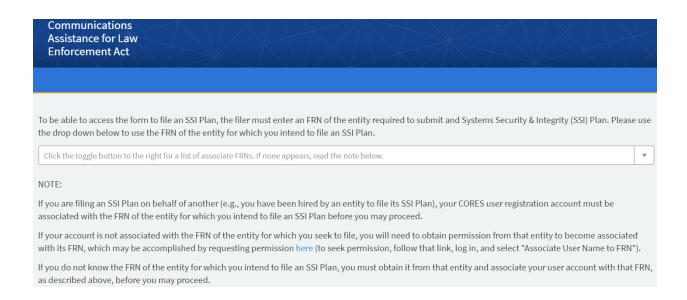


Once you click on the CEFS icon, the login screen will appear, shown below. Enter your FCC User Registration login and password.

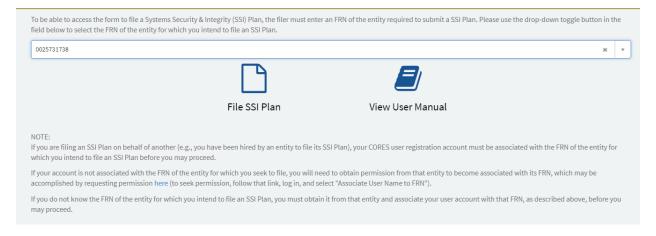


3.3 Entering CEFS

Upon logging in with their FCC User Registration username and password, user will be prompted to select an FRN. The FRNs in the drop down are the FRNs that are associated to the current user's registration. If there are no FRNs available in the drop down, the user will need to consult with the company they are filing for to associate to the company's FRN. This is explained on the landing page where a link is provided that will redirect the user to CORES to login and initiate the request to associate to a company's FRN.



Once the user has selected an FRN for the company in which they are filing for, a "File SSI Plan" icon will appear. Click "File SSI Plan" to access the portal intake form for submitting the company's SSI Plan.



4. Submitting SSI Plan

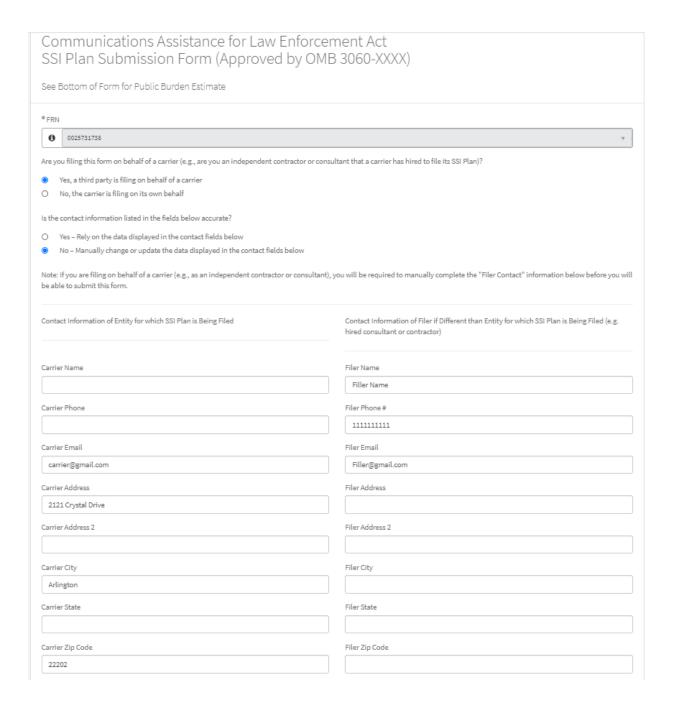
4.1 Entity FRN Information

Once the user accesses the intake form, all information associated to the FRN record that the user chose on the landing page will prepopulate in the Contact fields. The contact information for the person doing the filing will populate in the 'Filer' fields which is linked to the CORES account of the user doing the filing. The user has the option to move forward with the information presented by keeping "Rely on the company name displayed" button clicked. All fields will remain grayed out.

If the user wants to change any information, click the button that reads "Manually enter the name of the company for which the SSI plan is being filed." Carrier Name, Carrier Phone Number, and Carrier Email are all required fields to be able to submit the form.

Note: All contact information entered will be used to reach out to applicable parties if form data is incorrect after submission.

Note: All the fields are required except Address 2. Before external users submit the form, they need to make sure that all information is filled in correctly.



4.2 CALEA SSI Policies and Procedures

The remainder of the fields on the intake form are required information to help insure compliance with certain CALEA SSI requirements in the FCC's regulations. The user is required to proceed through form and enter their information into all text fields. This information can and should come directly from the user's copy of their SSI Plan.

Enter the following information required to be submitted to the FCC by 47 C.F.R. § 1.20003 and 1.20004:

*47 C.F.R. § 1.20003 (a): "Appoint a senior officer or employee responsible for ensuring that any interception of communications or access to call-identifying information effected within its switching premises can be activated only in accordance with a court order or other lawful authorization and with the affirmative intervention of an individual officer or employee of the carrier"

Paste or enter the relevant language from the SSI policy and procedures document appointing the senior officer or employee responsible for ensuring that any interception of communications or access to call-identifying information effected within its switching premises can be activated only in accordance with a court order or other lawful authorization and with the affirmative intervention of an individual officer or employee of the carrier.

*47 C.F.R. § 1.20003 (b)(1): "A statement that carrier personnel must receive appropriate legal authorization and appropriate carrier authorization before enabling law enforcement officials and carrier personnel to implement the interception of communications or access to call-identifying information"

Paste or enter the relevant statement from the SSI policy and procedures document stating that carrier personnel must receive appropriate legal authorization and appropriate carrier authorization before enabling law enforcement officials and carrier personnel to implement the interception of communications or access to call-identifying information.

*47 C.F.R. § 1.20003 (b)(2): "An interpretation of the phrase "appropriate authorization" that encompasses the definitions of appropriate legal authorization and appropriate carrier authorization, as used in paragraph (b)(1) of this section [1.20003]"

Paste or enter the relevant statement from the SSI policy and procedures document that interprets the phrase "appropriate authorization" that encompasses the definitions of appropriate legal authorization and appropriate carrier authorization, as used in paragraph (b)(1) of this section [1.20003].

*47 C.F.R. § 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"

Paste or enter the relevant language from the SSI policy and procedures document that provides a detailed description of how long [the responding entity] will maintain its records of each interception of communications or access to call-identifying information pursuant to §1.20004.

- 47 C.F.R. § 1.20003 (b)(4): "In a separate appendix to the policies and procedures document:"
- *47 C.F.R. § 1.20003 (b)(4)(i): "The name and a description of the job function of the senior officer or employee appointed pursuant to paragraph (a) of this section"

Paste or enter the information from the appendix to the policy and procedures documents that states the name and a description of the job function of the senior officer or employee appointed pursuant to paragraph (a) of FCC Rule 1.20003.

*47 C.F.R. § 1.20003 (b)(4)(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"

Paste or enter the information from the appendix to the policy and procedures documents that provides information necessary for law enforcement agencies to contact the senior officer or employee appointed pursuant to paragraph (a) of FCC Rule 1.20003 or other CALEA points of contact on a seven days a week, 24 hours a day basis.

*47 C.F.R. § 1.20003(c): "Report to the affected law enforcement agencies, within a reasonable time upon discovery: (1) Any act of compromise of a lawful interception of communications or access to call-identifying information to unauthorized persons or entities; and (2) Any act of unlawful electronic surveillance that occurred on its premises."

Paste or enter information from policy and procedures documents summarizing the process for reporting an act of compromise of a lawful interception of communications, pursuant to 47 C.F.R. § 1.20003(c).

*47 C.F.R. § 1.20004 Maintaining secure and accurate records: "A telecommunications carrier shall maintain a secure and accurate record of each interception of communications or access to call-identifying information, made with or without appropriate authorization, in the form of single certification."

Paste or enter a summary from policy and procedures documents detailing the information included in maintaining a secure and accurate record of each interception of communications or access to call-identifying information, made with or without appropriate authorization, pursuant to 47 C.F.R. § 1.20004.

The last question on the form requires the user to select either the yes or no button for confidential treatment. If 'yes' is selected, an additional attachment requesting confidential treatment is required. Move to next section to learn how to upload attachments.

* Do you request confidential treatment under 47 CFR § 0.459?

● Yes ○ No

If you answered "yes" to the preceding question, please upload your written justification for confidential treatment.

5. Attachments

5.1 SSI Plan File

A soft copy of the SSI Plan that the company will be keeping on file is required to be attached to the intake form. This uploaded copy of the SSI Plan must describe all SSI information, policies, procedures, and recordkeeping compliance requirements specified at 47 CFR §§ 1.20003 and 1.20004, including all descriptions separately entered in the intake form. Click 'Add Attachment' at the bottom of the form next to the line that reads, "You are required to submit your System Security and Integrity Plan before you can file."

You are required to submit your System Security and Integrity Plan before you can file.



If you upload an incorrect file and would like to upload a new one, you can delete the attachment by clicking the 'X' to the far right of the attachment. If you would like to rename the file, click the pencil to edit the title of the document uploaded.

Files Uploaded:



5.2 Confidential Treatment Justification

If the user selects 'yes' to requiring confidential treatment under 47 CFR § 0.459, the intake form will require the user to upload a justification document. To upload this document, click 'Add Attachment' next to the line that reads, "Because you have selected 'Yes' as a response to the question asking if you seek confidential treatment under 47 CFR § 0.459, please submit a justification for confidential treatment in addition to your SSI Plan."

Because you have selected 'Yes' as a response to the question asking if you seek confidential treatment under 47 CFR § 0.459, please submit a justification for confidential treatment in addition to your SSI Plan.



If you upload an incorrect file and would like to upload a new one, you can delete the attachment by clicking the 'X' to the far right of the attachment. If you would like to rename the file, click the pencil to edit the title of the document uploaded. At this point, the user should have 2 documents under 'Files Uploaded' to be able to submit their form. If no confidential treatment justification was needed, then the user will only need one document to submit their form. The form is structured to prompt users on how many attachments are needed for a complete submission. The below screenshot is what the form will look like when confidential treatment justification is uploaded.

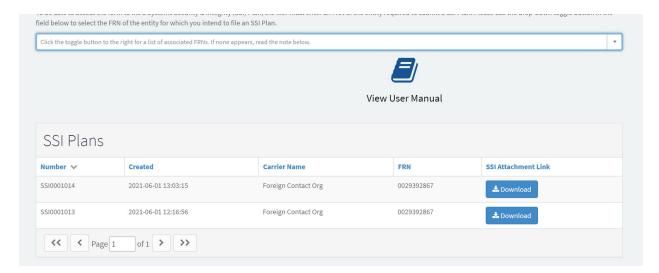
Files Uploaded:



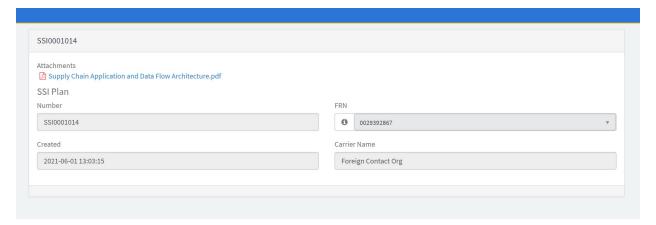
6. Viewing Prior CEFS SSI Plan Filings

Once you have filed an SSI Plan in CEFS, you can log back into the system to view your past filings. Viewing past CEFS-filed SSI Plans is restricted by FRN, so only users logging in with FCC User Registrations that have been formally associated with an FRN will be able to view only those SSI Plans for the entity assigned that FRN.

After logging in to CEFS using your FCC User Registration, you will reach the main CEFS start screen. The prior CEFS-filed SSI Plans associated with your associated FRN(s) will be shown below the buttons, along with the date-filed. Click on the entries to view and download a copy of the prior SSI Plans.



Here you can view all past filings for the FRN associated with your FCC User Registration and either download your SSI plan, or click the entry to view the following screen:



7. Technical Assistance and Rules Questions

Filers experiencing technical difficulties using the CEFS system or CORES should call the FRN Help Line at 877-480-3201. Filers may also contact the CORES Help Desk at CORESHelpDesk@fcc.gov or (202) 418-4120.

Any filers with questions concerning the regulatory requirements for CALEA SSI Plans may visit the <u>CALEA</u> webpage or send an email to <u>FCC-CALEAinquiries@fcc.gov</u>.