

**Non-Substantive Change Request for Information Collection
3060-0809 – CALEA**

**(Related information collections: 3060-0917, 3060-0918 – CORES;
3060-0862 – Requests for Confidential Treatment of Information)**

The Public Safety and Homeland Security Bureau (PSHSB or Bureau) is submitting a non-substantive change request to the Office of Management and Budget (OMB) in order to establish mandatory electronic filing of System Security and Integrity Policies and Procedures (SSI Plans) by covered entities under the Communications Assistance for Law Enforcement Act (CALEA)¹ through the new CALEA Electronic Filing System (CEFS) (OMB Control No. 3060-0809). CEFS requires users to register with and use the Commission Registration System (OMB Control Nos. 3060-0917 and 3060-0918) and to electronically file Requests for Confidential Treatment (OMB Control No. 3060-0862).

Previously, under 47 CFR § 1.20005, SSI Plans were filed by paper with the Commission before commencing service, and within 90 days of a carrier's merger or divestiture or a carrier's amendment of its existing policies and procedures. OMB previously approved our initial non-substantive change request to these four collections for SSI Plan filing in CEFS on May 6, 2022.² On June 1, 2022, PSHSB announced the upcoming launch of the CEFS for voluntary filing during a transition period leading up to mandatory filing and how CEFS will allow entities to file SSI Plans confidentially and securely online, eliminating the need for paper filing.³

When mandatory electronic filing becomes effective, SSI Plans will be required to be submitted electronically through CEFS: <https://www.fcc.gov/cefs>. The CEFS will present a public-facing web form containing data entry fields for collection of key portions of the required data. There is no substantive change to requirements and the content of uploaded SSI Plan is not different from what is currently required in paper-filed SSI Plans and SSI Plans submitted voluntarily in CEFS. When mandatory electronic filing becomes effective, paper versions of SSI Plans will no longer be accepted. Section 1.20005 of the Commission's rules will be updated to reflect this change. Other than mandatory electronic filing, there are no other changes to this information collection. PSHSB issued the order to

¹ CALEA's requirements apply to common carriers, facilities-based broadband Internet access service providers and interconnected Voice over Internet Protocol (VoIP) service providers. *See Communications Assistance for Law Enforcement Act and Broadband Access and Services*, First Report and Order and Further Notice of Proposed Rulemaking, 20 FCC Rcd 14989 (2005) (concluding that CALEA applies to facilities-based broadband Internet access providers and providers of interconnected VoIP service); Second Report and Order and Memorandum Opinion and Order, 21 FCC Rcd 5360, 5394-95, paras. 75-76 (2006) (requiring facilities-based broadband Internet access providers and interconnected Voice over Internet Protocol (VoIP) service providers to also file SSI Plans).

² *See* OMB Approvals for Non-Substantive Changes to Currently Approved Information Collections (OMB Control Nos. 3060-0809, 3060-0917, 3060-0918, 3060-0862), May 6, 2022; *see also* OMB Approvals for Extension without Change of a currently approved collection for Control No. 3060-0809 (approved through Oct. 31, 2025), Oct. 18, 2022.

³ *Public Safety Homeland Security Bureau Provides Information on Implementation of Voluntary Electronic Filing of CALEA System Security and Integrity Plans and Seeks Comment on Mandatory Electronic Filing*, Public Notice, DA 22-592 (PSHSB rel. June 1, 2022) (*CEFS Announcement Public Notice*).

amend section 1.20005 to establish mandatory filing and the new rule will become effective 30 days after publication in the Federal Register.⁴

The new database, CEFS, will offer electronic filing to the public, and be consistent with OMB directives to reduce the burden on the public. For example, mandatory electronic filing in CEFS will provide several benefits to entities and Commission staff, including cost savings, convenience, and administrative ease. The new database will streamline the filing process to reduce the time and paperwork burden. The Commission anticipates the estimated time burden will be reduced with electronic filing of SSI Plans because the new system will reduce the preparation time and paperwork burden on regulated entities. Also, CEFS will also enhance recordkeeping and retrieval capabilities. The new database will offer a web form that will help ensure filers supply necessary information in their SSI Plans. The CEFS will further reduce the time burden imposed on the Commission and the responders when deficient paper SSI plans must be returned to responders for correction.

⁴ See *Communications Assistance for Law Enforcement Act Electronic Filing System (CEFS)*, PS Docket No. 22-217, Order, DA 23-392 (PSHSB May 15, 2023) (*CALEA SSI Plan Mandatory Electronic Filing Order*).