

aggregate to all carriers.²⁴ Thus, CTIA urges the Commission to act under Section 107(b) to grant an omnibus extension.²⁵

III. CONCLUSION

CTIA urges the Commission to stay CALEA compliance pending completion of this rulemaking, to remand any changes in JSTD-025 to TR45.2 for action, and to immediately extend the compliance deadline for 24 months, effective upon completion and promulgation of any revised standards. The Commission has the authority to grant this request, it is the most efficient approach, and it will avoid needlessly burdening carriers and the Commission by requiring hundreds of individual petitions for extension to be filed and then responded to in rubber-stamp fashion.

²⁴ Certainly, the Commission could use its authority under Section 301 of CALEA to implement a procedure to streamline the petition process by requiring only a carrier submission that would state that the carrier has consulted with the manufacturer of its telecommunications equipment and that a compliant technology is not currently available. But this is still an unnecessary burden given the clear and undisputed record that solutions are not now available.

²⁵ The extension would apply to all lines of business, whether providing wire or electronic communication. No segment of the wireless industry can field CALEA-compliant equipment today.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Altschul", is written over a solid horizontal line.

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