

# ***GS TEXAS VENTURES LLC***

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February 11, 2015

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, N.W.  
Washington, DC 20554

**Re: GS Texas Ventures, LLC, System Security and Integrity Plan,  
ET Docket No. 04-295**

Dear Ms. Dortch:

Attached, pursuant to 47 C.F.R. § 1.20005, please find the System Security and Integrity Plan of GS Texas Ventures, LLC.

Should you have any questions, please do not hesitate to contact me at the number below.

Many regards,

**Michael Hatfield, President  
GS Texas Ventures, LLC  
5070 Mark IV Parkway  
Fort Worth, TX 76106**

Enclosures

cc: David Ward, Senior Legal Advisor, Policy Division, Public Safety and Homeland Security Bureau,  
FCC

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Email: [Contact@gstxventures.com](mailto:Contact@gstxventures.com) Phone: 817-838-1800 Fax: 817-838-1821

## **SYSTEM SECURITY AND INTEGRITY PLAN OF GS Texas Ventures, LLC**

The following procedures govern GS Texas Ventures, LLC's compliance with lawful requests for electronic surveillance in conformity with the Communications Assistance for Law Enforcement Act as implemented by Part 1, Subpart Z of the Commission's rules, 47 C.F.R. Part 1, Subpart Z.

### **I. OVERVIEW**

Any employee that receives a request from a law enforcement agency or anyone else for any form of electronic surveillance must follow these procedures exactly. Failure to adhere to the procedures set forth herein may result in disciplinary action, including possible termination of employment.

### **II. ACTIONS AND AUTHORIZATIONS**

Any employee who receives a request for any form of electronic surveillance, whether from a law enforcement official or from any other person, should immediately direct the requesting party to Michael Hatfield ("SSI Representative"), who has been designated by **GS Texas Ventures, LLC** as the authorized person to accept these requests and act on them. The SSI Representative is specifically charged with the responsibility to assist law enforcement in conducting any interception of communications or providing access to call-identifying information. In addition, the SSI Representative is responsible for ensuring that appropriate legal authorization is provided. Such authority consists of a court order signed by a judge or magistrate authorizing or approving interception of wire or electronic communications, or other authorization pursuant to 18 U.S.C. § 2518(7) or any other relevant federal or state statute. The SSI Representative's name, title, and contact information have been submitted to local law enforcement agencies in advance so that requests of this nature can be submitted directly to him. This information, along with a description of the duties of the SSI Representative, is included in Appendix A, attached hereto. In the event that the SSI Representative is not available, all requests must be immediately directed to the most senior management employee available.

The SSI Representative designated to act on these types of requests will assume total responsibility for any request from receipt of the request to its final disposition, including the proper certification and storage of all details regarding the request. The specific responsibilities include but are not limited to:

- Serving as the point of contact for law enforcement concerning a court-ordered surveillance request twenty-four hours a day, seven days a week;
- Ensuring that all requests are made with appropriate legal authorization, such as a court order signed and dated by the judge or magistrate authorizing or approving the request; and
- Implementing the request by, among other things, initiating the request for interception or access to call-identifying information, instructing those performing the various tasks involved, and ensuring compliance with all applicable rules and regulations.

### III. RECORDS RETENTION

Information regarding each interception of communications, whether properly authorized or not, will be documented on an approved certification form contemporaneously with, or within a reasonable time after, the initiation of the interception. Such certification will include the following:

- The name of the requesting law enforcement officer, together with his or her agency and department, and a copy of the court order or equivalent authorization; or, in the case of an unauthorized interception, all available documentation detailing the request;
- Information regarding the surveillance request, including the date and time it was presented, the date and time of implementation, the type of interception or call-identifying information requested (*e.g.*, pen register, trap and trace, Title III, or FISA), the target's name and telephone number or circuit identification, and the duration of the interception; and
- The actions taken to obtain this information, and the name, signature, and title of the SSI Representative authorizing and overseeing the action requested in the court order or unauthorized request.

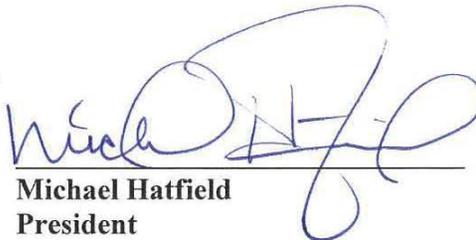
After review of the certification form and associated documents, the SSI Representative will sign and date the record and ensure that it is maintained in **Fort Worth, Texas**, a secure area, for a period of two years.

### IV. UNAUTHORIZED USE OF SURVEILLANCE CAPABILITIES

Any employee who knowingly misuses intercept capabilities intended for lawful surveillance will face disciplinary measures, up to and including dismissal. Information regarding any attempt to interfere with a lawful request for surveillance and any incidents of unauthorized electronic surveillance will be reported to local law enforcement.

These policies and procedures will remain in effect until notice is provided to the Commission regarding a significant change.

Signed this 12 of February, 2015.

  
Michael Hatfield  
President

Appendix A

Description and Contact Information of  
System Security and Integrity (SSI) Representative

**Name:** Michael Hatfield  
**Title:** President

**Contact Information:** [SHOULD INCLUDE INFORMATION TO REACH SSI REPRESENTATIVE ON A 24/7 BASIS]

5070 Mark IV Parkway  
Fort Worth, TX 76106  
817-509-1228 Office  
817-455-4704 Cell  
817-838-1821 Fax  
michael@thrifftm.com

**Job Description:** In addition to his duties as the SSI Representative described in the attached SSI Plan, **Michael Hatfield** serves as the **President** for **GS Texas Ventures, LLC**. In that capacity, Michael Hatfield is responsible for overseeing all company operations.

In the event that the above listed SSI Representative cannot be reached, [INCLUDE PHONE NUMBER AND ANY OTHER INSTRUCTIONS FOR REACHING A BACKUP CALEA CONTACT].

**Dana Hoyle**  
**Regulatory Consultant**  
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