

EX PARTE OR LATE FILED

**BELLSOUTH**

Ben G. Almond  
Vice President-  
Federal Regulatory

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JUL 1 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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July 1, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

**ORIGINAL**

RE: In the Matter of: Communications Assistance for Law Enforcement Act  
CC Docket 97-213 **EX PARTE**

Dear Ms. Salas:

This is to inform you that on July 1, Lloyd Nault and Ben Almond, both of BellSouth Corporation met in separate meetings with Commissioner Harold Furchtgott-Roth and his assistants in one meeting and with Dan Connors in Commissioner Susan Ness's office in the other meeting concerning the above referenced subject. The BellSouth representatives briefly restated their company's position as previously provided on record concerning resolution of the technical standards for wiretap capability of digital services. The FBI is not entitled to the nine punch list items because they are not based on the law, not reasonably achievable, extremely expensive and not in the public's interest. Also discussed were desired modifications, if the Commission granted punch list items to the FBI. The attached document was used to discuss specific modifications to facilitate BellSouth's implementation of the five punch list items tentatively supported by the Commission as stated in the NPRM document. These modifications should not be considered all inclusive of the modifications needed by BellSouth.

Please associate this notification and the accompanying document with the referenced docket proceeding. The assistants in attendance with Commissioner Furchtgott-Roth were Robert A. Calaff, Katherine Harris and David DuBose.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,



Ben G. Almond  
Vice President-Federal Regulatory

Attachment

Cc: Commissioner Harold Furchtgott-Roth  
Robert A. Calaff  
Katherine Harris  
David DuBose  
Dan Connors

No. of Copies rec'd 071  
List ABCDE

**BellSouth Exparte on Five CALEA Punch List Items**  
**6/28/99**

If the Commission should decide to grant the five punch list items, BellSouth requests the following:

- Recognition by the Commission that modifications to the FBI/DOJ desires are necessary and appropriate.
- Authority and flexibility at a minimum to pursue and implement an economical alternative to the Dialed Digit Extraction feature, since this feature capability represents the single most expensive punch list item.
- Recognition that the extent of switch upgrades should be based on actual switches having experienced surveillance activity. Most surveillance activity occurs in a relatively few areas.
- BellSouth should not be required to upgrade all switches in its network, when only a few actually experience surveillance activity. Only 16% of BST host switches experienced surveillance activity in 1998.
- Since manufacturers will not have equipment ready until mid to late year 2000, the Commission should extend the compliance date well beyond the present date of June 2000.
- The industry, including BellSouth's wireline and wireless affiliates, should be allowed to receive full cost recovery for making required switch upgrades. For BellSouth's wireline affiliate (BellSouth Telecommunications) the cost could range from \$85 million to \$529 million, depending upon the final standards adopted by the Commission. This could impact customers' monthly bills from an additional \$.10 to \$.62.