

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUN 20 2003

Federal Communications Commission
Office of Secretary

In the Matter of)
)
The Communications Assistance)
For Law Enforcement Act (CALEA),)
Section 107(c) Extension of)
Capability Requirements)
)
SBC Communications Inc.,)
on behalf of:)
)
Southwestern Bell Tel., L.P.)
Pacific Bell Tel. Co.)
Nevada Bell Tel. Co.)
Southern New England Tel. Co.)
Ameritech - Illinois)
Ameritech - Indiana)
Ameritech - Michigan)
Ameritech - Ohio)
Ameritech - Wisconsin)
)
TRS Nos. 805767, 801963, 804483,)
804489, 803214, 803220, 803217,)
803226, and 803223)

CC Docket No. 97-213

File No. NSD-L-00-234

SECOND SUPPLEMENTAL PETITION OF
SBC COMMUNICATIONS INC. ON BEHALF OF ITS WIRELINE SUBSIDIARIES FOR EXTENSION
OF CALEA COMPLIANCE DATE REGARDING PUNCH LIST STANDARDS

Pursuant to section 107(c) of CALEA, SBC Communications Inc. (SBC) supplements its previously filed supplemental petition for an extension of the punch-list standards compliance deadline for its Lucent 5ESS and Siemens EWSD switches for the above-identified wireline carriers, having TRS Nos. 805767, 801963, 804483, 804489, 803214, 803220, 803217, 803226, and 803223.¹ In its "Order on Remand," dated April 11, 2002, this Commission lifted the

¹ SBC respectfully supplements its previously filed CALEA extension petition. These carriers with their respective TRS Numbers are: Southwestern Bell Telephone, L.P. (SWBT: TRS # 805767), Pacific Bell Telephone Company (Pacific Bell: TRS # 801963), Nevada Bell Telephone Company (Nevada Bell: TRS # 804483), Southern New England Telephone Company (SNET: TRS #804489), Ameritech-Illinois (AIL: TRS # 803214), Ameritech-Indiana (AIN: TRS # 803220), Ameritech-Michigan (AM: TRS # 803217), Ameritech-Ohio (AO: TRS#

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suspension of the punch list compliance deadline, and specified the revised punch list compliance deadline as June 30, 2002.² In the same order, the Commission also directed carriers that are unable to comply to seek relief under the applicable provisions of CALEA in accordance with the procedures set out in a *Public Notice* issued September 28, 2001.³ By its supplemental petition, dated June 27, 2002, SBC requested that the Commission extend the deadline for section 103 compliance with respect to CALEA punch list items to June 30, 2004.

Commission Staff Request

At the request of Commission staff, SBC supplements that prior supplemental petition by attaching a copy of SBC's most recent Flexible Deployment Schedule for CALEA punch list compliance, which was provided to the FBI on May 8, 2003 (attached hereto as Attachment A).

In addition to its updated Flexible Deployment Schedule, SBC also provides the following deployment status notes:

- SBC is at punch list compliant generics (NA014 and above) on all of its Nortel DMS100 switches.
- SBC is core and packet compliant on all Lucent 5ESS switches and is in the process of upgrading all of its post January 1, 1995, Lucent 5ESS switches to generic 5E16.2 by June 30, 2004, for punch list compliance.
- The Siemens EWSD REL20 generic and associated switch based CALEA solution are currently undergoing SBC's Approval-For-Use process. Assuming no major problems with this release, SBC plans to upgrade all of its post-January 1, 1995 Siemens EWSD offices by June 30, 2004. Once there is a clear indication that the Siemens EWSD REL20 CALEA solution can be deployed, SBC will resubmit its Flexible Deployment Schedule with planned deployment dates.

803226), and Ameritech-Wisconsin (AW: TRS # 803223). SBC will refer to the Ameritech operating companies collectively as "Ameritech." SBC Telecom Inc. (SBCT: TRS # 820880) is presently compliant. Its switches are already on Lucent 5E15, which is CALEA compliant.

² *Communications Assistance for Law Enforcement Act*, Order on Remand, FCC 02-108 ¶ 129 (rel. April 11, 2002).

³ *Id.*, ¶ 128; see also *Public Notice: The Common Carrier and Wireless Telecommunications Bureaus Establish Procedures for Carriers to Submit or Supplement CALEA Section 107(c) Extension Petitions, Both Generally and with Respect to Packet-mode and Other Safe Harbor Standards*, 16 FCC Rcd 17101 (2001).

- SBC's Nortel DMS-10 and Ericsson AXE switches are all pre-January 1, 1995 and the Lucent 1AESS is not technically feasible.

Respectfully submitted,

SBC COMMUNICATIONS INC.

By: 
William A. Brown

William A. Brown
SBC Communications Inc.
1401 I Street, N.W., 4th Floor
Washington DC 20005
(202) 326-8904 - Telephone
(202) 408-8745 - FAX

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Its Attorney

ATTACHMENT A

SBC Flexible Deployment
Schedule

CONFIDENTIAL INFORMATION

— Redacted —