



January 27, 2004

Re: CALEA Compliance

Attachment: Net to Net CALEA Compliance

To Whom It May Concern:

Currently, there is no approved industry standard for CALEA Packet Mode that telecommunications carriers and manufacturers of telecommunications equipment such as Net-to-Net can conform to. Thus, Net-to-Net cannot at this time determine whether its products provide capabilities to comply with CALEA Packet Mode requirements.

As the FCC and other applicable authorities, and the appropriate industry standards bodies, clarify the CALEA requirements, Net to Net will review our position and modify it as appropriate.

A handwritten signature in black ink, appearing to read 'Ken Latimer', is written over a horizontal line.

Kenneth J Latimer, Jr.
Chairman and CEO



January 30, 2004

ATTACHMENT B

Randy Nicholson
Table Top Telephone Company
600 N. Second Avenue
Ajo, AZ 85321

RE: Compliance of Advanced Fibre Communications, Inc. ("AFC") Products with the Communication Assistance for Law Enforcement Act, P.L. No. 103-414

AFC would like to inform you as to whether the telecommunications equipment sold to you by AFC is in compliance with the terms of the federal Communication Assistance for Law Enforcement Act, P.L. No. 103-414 ("CALEA"), as required by the Federal Communications Commission ("FCC").

As you know, CALEA compliance is a requirement placed upon common carriers, and the suppliers of such related equipment must support CALEA in the environment accordingly. Today, Class 5 switches from all major vendors support the interfaces to CALEA and this functionality is transparent to all access equipment. AFC's equipment currently does not provide capabilities to satisfy CALEA requirements. It is expected that the Class 5 switch with which the AFC products operate provides the necessary CALEA interface.

The FCC ruling on CALEA has been extended to cover packetized voice and includes the Voice over IP (VoIP) technology. Several products on the market support voice transmission over the public internet and operate over many transmission infrastructures (Dial Modem, ISDN, Frame Relay, Leased T-1, DSL, etc.). Transmissions from these products are transparent to the AFC family of products at this time. AFC's products, including UMC1000® (later re-branded as AccessMAX™), DMAX™, EMAX™, and EMAX Plus™, do not have CALEA support for this style of voice transmission. If a LEC is providing packet voice services (such as VoIP), we expect the required CALEA support for such service to come from the softswitch used to provide such service.

Our customers may desire CALEA support for IAD and voice gateway combinations. If such products interface with a Class 5 switch over a standard telephony interface (TR-57, TR-08, GR-303), then the CALEA support by the Class 5 switch will be sufficient as to these products. However, AFC is unable to confirm the CALEA support as to other types of interfaces that may be used with this form of communication.

As the FCC and other applicable authorities clarify their position on CALEA requirements, we will continue to review our position and modify it as necessary. In addition, new features introduced into the AFC product portfolio may require more significant support for CALEA than our current features do. AFC will keep you informed about these developments as they occur.

AFC fully supports all governmental requirements that apply to access equipment. We look forward to supporting our customers in doing so as well. If you would like any additional information regarding AFC products and our commitment to fully comply with all applicable CALEA directives, please contact your AFC representative.

Sincerely,

Scott Remillard
Sr. Account Manager
707-824-8156

January 27, 2004



Randy Nicholson
Table Top Telephone Co.
600 North Second Avenue
Ajo, AZ 85321

ATTACHMENT B

Dear Randy,

The Communications Assistance and Law Enforcement Act of 1994 (CALEA, Pub. L. No. 103-414, 108 Stat. 4279, <http://www.askcalea.com/calea.html>) requires telecommunications carriers to ensure that their equipment, facilities, and services are able to comply with authorized electronic surveillance. Since Calix supplies telecommunications carriers with platforms necessary to deliver a range of services to business and residential customers, several carriers have inquired about the CALEA compliance of the Calix C7. This letter summarizes Calix's understanding of CALEA compliance requirements and the relevant role of the Calix C7.

It is Calix's understanding that the telecommunications carrier is the entity that ultimately has the responsibility to design and implement their network in a manner that enables compliance with authorized electronic surveillance requirements. This compliance may be achieved in whole or in part through specific capabilities of one or more pieces of equipment in the carrier network or by flowing their services through a third party service provider that may provide the required electronic surveillance capability.

In the case of the Calix C7, all voice and data services that would be subject to CALEA electronic surveillance are passed upstream for switching or routing between one subscriber and another subscriber. Therefore, the Calix C7 does nothing explicitly to enable or prevent a service provider from designing and implementing their networks in a manner that would enable compliance with CALEA's authorized electronic surveillance requirements.

We have included specific answers to the questions posed by the CALEA "interim" standard (J-STD-025), below:

- 1.) Is your equipment listed currently compliant with the packet mode CALEA surveillance capability requirements?

Calix Response: Not applicable. The Calix C7 Simplified Services Platform does not terminate Internet traffic and is not subject, at this time, to the packet mode CALEA surveillance capability requirements.

- 2.) If the answer to 1 is no, do you have available additional hardware/software that could be installed with or in the equipment to allow it to become compliant with these requirements?

Calix Response: Calix is planning a future release that will terminate Internet traffic and include IP Layer 3 functionality. At that time the Calix C7 Simplified Services Platform will have hardware/software that is compliant to the packet mode CALEA surveillance capability requirements.

- 3.) If the answer to 2 is no, are you trying to develop additional hardware and/or software that would enable the equipment to comply with these requirements and, if so, when is such additional hardware/software scheduled to be available?

Calix Response: Calix is planning a future release that will terminate Internet traffic and include IP Layer 3 functionality. At that time the Calix C7 Simplified Services Platform will have hardware/software that is compliant to the packet mode CALEA surveillance capability requirements.

4.) If the answer to 3 is no, are you aware of other vendors that offer hardware/software compatible with your equipment that would enable it to comply with these requirements?

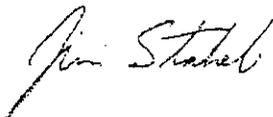
Calix Response: Not applicable. See response to #1-3 above.

Calix works closely with regulatory agencies and with telecommunications service providers in order to monitor regulatory requirements placed on Calix products in order to support our customers. In the event that new requirements are identified, Calix will provide updates as appropriate.

Calix also continuously enhances its products, and certain enhancements may require a more definitive surveillance monitoring capability in the future. Should this occur, Calix will provide updates to our customers.

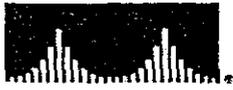
If you have any additional questions please contact your Calix representative.

Sincerely,

A handwritten signature in cursive script that reads "Jim Staheli".

Jim Staheli
Senior Account Manager
Calix
1035 N. McDowell
Petaluma CA 94954
707-766-3078
jim.Staheli@calix.com

CISCO SYSTEMS



January 29, 2004

Randy Nicholson
Table Top Telephone Co, Inc.
600 N. 2nd Ave
Ajo AZ, 85321

Dear Mr. Nicholson,

Thank you for your January 29, 2004 inquiry about the support of CALEA functionality for the Cisco products in your network.

Cisco has been developing and testing the ability to intercept IP packets based on source/destination IP address on several of its product platforms, including the 72xx, 75xx, 100xx, 366x. These products must be utilized in conjunction with third party mediation device equipment in order to effect the interception of IP traffic. In addition, your ability to effectively conduct the interception of IP traffic will depend on the specific configuration of your network and service you are providing to your customers. Your Cisco account manager can provide you more specific information based on your network configuration and service.

Notwithstanding the foregoing, Cisco makes no representations or warranties as to whether or not the platforms listed above will permit Table Top Telephone Co, Inc. to comply with its "packet-mode" CALEA requirements. We recommend that you consult with your own legal counsel to determine your specific obligations pursuant to this Act. You may also want to consider contacting a third party mediation device vendor, such as Verint or SS8, regarding the possibility of purchasing alternative "packet-mode" CALEA functionalities compatible with the listed device(s) and or system(s) that you have purchased from our company. Cisco also has identified two companies, VeriSign and Fiducianet, that are CALEA service bureaus. These companies offer various services to assist Service Providers in complying with CALEA.

If you would like additional information regarding Cisco's CALEA strategy, including product release schedules, please contact your Cisco Account Manager.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Yoder". The signature is written in a cursive style with a long horizontal flourish at the end.

Jason Yoder
Sr. Manager, Legal Business Services & Regulatory Affairs
Cisco Systems, Inc.

IP Telephone: 408 526 7045
Email: regaffairs@cisco.com Subject: Lawful Intercept Inquiry

APPENDIX D - FLEXIBLE DEPLOYMENT ASSISTANCE GUIDE TEMPLATE

ATTACHMENT C

OMB Control Number: 1110-0030
 Expiration Date: April 30, 2003

Carrier Name Table Top Telephone Company, Inc.
 TRS Number 809626
 Contact Person Robert A. Grooms
 Address 600 N. Second Ave.
 City, State, Zip Ajo, AZ 85321
 Telephone Number 520-387-5600
 Fax Number 520-387-5602
 e-mail bgrooms@tabletoptelephone.com

If Applicable:

Consultant of Record (COR)
 COR Company Name
 COR Address
 COR City, State, Zip
 COR Telephone Number
 COR Fax Number
 COR e-mail

Jack Pendleton
GVNW Consulting, Inc.
8050 SW Warm Springs St, Ste 200
Tualatin, OR 97062
503-612-4400
503-612-4401
jpendleton@gvnw.com

Switch Specific Information				Deployed Generics										Interceptions			
				Previous -1		Previous		Current		Next		Next + 1					
CLLI Code or Other Unique Identifier	Component Location	Service Area(s) Served	Manufacturer & Component Platform	n-2		n-1		n		n+1		n+2		2000	2001	2002	2003
				Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed				
AGULAZXC	Aguila, AZ	Maricopa & Yavapai Cty	AGCS/Lucent SuperLine DSLAM					N/A	09/01	None Planned				0	0	0	0
AJO AZXC	Ajo, AZ	Pima County	AGCS/Lucent SuperLine DSLAM					N/A	07/01	None Planned				0	0	0	0
BGDDAZXC	Bagdad, AZ	Yavapai County	AGCS/Lucent SuperLine DSLAM					N/A	10/01	None Planned				0	0	0	0
SLMNAZXC	Seligman, AZ	Coconino & Yavapai county	AGCS/Lucent SuperLine DSLAM					N/A	12/01	None Planned				0	0	0	0
AGULAZXC	Aguila, AZ	Maricopa & Yavapai Cty	Net to Net DSLAM					4.03.84	12/01	None Planned				0	0	0	0
AJO AZXC	Ajo, AZ	Pima County	Net to Net DSLAM					4.03.84	12/01	None Planned				0	0	0	0
BGDDAZXC	Bagdad, AZ	Yavapai County	Net to Net DSLAM					4.03.84	12/01	None Planned				0	0	0	0

Please e-mail this form to FlexD@AskCALEA.net

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Carrier Name Table Top Telephone Company, Inc.
 TRS Number 809626
 Contact Person Robert A. Grooms
 Address 600 N. Second Ave.
 City, State, Zip Ajo, AZ 85321
 Telephone Number 520-387-5600
 Fax Number 520-387-5602
 e-mail bgrooms@tabletoptelephone.com

If Applicable:
 Consultant of Record (COR) Jack Pendleton
 COR Company Name GVNW Consulting, Inc.
 COR Address 8050 SW Warm Springs St, Ste 200
 COR City, State, Zip Tualatin, OR 97062
 COR Telephone Number 503-612-4400
 COR Fax Number 503-612-4401
 COR e-mail jpndleton@gvnw.com

Switch Specific Information				Deployed Generics										Interceptions			
				Previous -1		Previous		Current		Next		Next + 1					
CLLI Code or Other Unique Identifier	Component Location	Service Area(s) Served	Manufacturer & Component Platform	n-2		n-1		n		n+1		n+2		2000	2001	2002	2003
				Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed				
SLMNAZXC	Seligman, AZ	Coconino & Yavapai county	Nel to Nel DSLAM					4.03.84	12/01	None Planned				0	0	0	0
BGDDAZXC	Bagdad, AZ	Yavapai County	AFC Access Max DSLAM					9.0.11	02/04	None Planned				0	0	0	0
SNDRAZXC	Sanders, AZ	Apache County	Calix C7 DSLAM					2.1	06/04	None Planned				0	0	0	0
AGULAZXC	Agulla, AZ	Maricopa & Yavapai Cty	Cisco 1720					12.1(8a)	01/02	None Planned				0	0	0	0
AJO AZXC	Ajo, AZ	Pima County	Cisco 2610					12.1(5)T1	01/02	None Planned				0	0	0	0
BGDDAZXC	Bagdad, AZ	Yavapai County	Cisco 2601					12.0(3)T3	01/02	None Planned				0	0	0	0
SNDRAZXC	Sanders, AZ	Apache County	Cisco 1700					12.2(8)T4	01/02	None Planned				0	0	0	0
SLMNAZXC	Seligman, AZ	Coconino & Yavapai county	Cisco 2500					12.1(5)	01/02	None Planned				0	0	0	0

Please e-mail this form to FlexD@AskCALEA.net