Law Office of Kristopher E. Twomey, P.C.
LoKT Consulting

March 12, 2007

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

Re: Odessa Office Equipment System Security and Integrity Plan, ET Docket No. 04-295

Dear Secretary Dortch:

Attached, pursuant to 47 C.F.R. § 1.20005, please find an original and four copies of the System Security and Integrity ("SSI") Plan filed on behalf of Odessa Office Equipment. This cover page will also be filed on ECFS without the SSI Plan.

Odessa Office Equipment seeks confidential treatment for this submission pursuant to Section 0.459 of the Commission's rules. 47 C.F.R. § 0.459. The information submitted herein includes a description of policies and procedures for meeting the needs of law enforcement as well as personal employee contact information, and thus should be exempt from disclosure under Sections 0.457(f) and (g) of the Commission's rules. *Id.* §§ 0.457(f)-(g). For similar reasons, the Commission has indicated in the past that it would not make information related to CALEA compliance routinely available to the public.[17] Public knowledge of these procedures could interfere with enforcement efforts and public safety, as well as permit an unwarranted invasion of privacy of our employees. *See id.* Odessa Office Equipment has not disclosed the information contained in this submission to the public at large, and will disclose the information only on a limited basis to third parties, and only for the purpose of assisting with lawfully ordered surveillance and information requests. Thus, the Commission should treat this System Security and Integrity Plan as confidential.

If you have any questions regarding this matter, please contact the undersigned.

Sincerely,

/S/

Kristopher E. Twomey
Regulatory Counsel

Enclosures
cc: David Ward, Senior Legal Advisor, Policy Division, Public Safety and Homeland Security Bureau, FCC (via email)

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[1] Public Notice, CALEA Section 103 Compliance and Section 107(c) Petitions, CC Docket No. 97-213, FCC 00-154, at ¶ 12 (rel. Apr. 25, 2000).

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