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April 9, 2012

**Via Overnight Delivery**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

**Re: ET Docket No. 04-295; RM-10865  
In the Matter of Communications Assistance for Law Enforcement Act and  
Broadband Access and Services ("CALEA")**

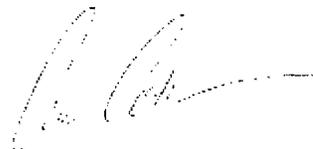
Dear Ms. Dortch:

Enclosed please find an original and four (4) copies of a Telecommunications Carrier Systems Security and Integrity Plan ("SSI Plan") filed on behalf of Broadcore, Inc. ("Broadcore"). This filing updates the company's contact information and the policies and procedures the company uses to comply with the Communications Assistance for Law Enforcement Act pursuant to 47 C.F.R Part 1, Subpart Z, §1.20000 – 1.20008.

An additional copy is included for date stamp and return, along with a self-addressed stamped envelope. Please return the date stamped copy to the undersigned.

If the Commission has any questions or needs additional information regarding this matter, please contact me at (703) 714-1308 or cac@commlawgroup.com.

Sincerely,



Christopher A. Canter, Esq.  
On behalf of Broadcore, Inc.

CC: David Ward, Senior Legal Advisor, Policy Division, Public Safety and Homeland Security Bureau,  
445 12th Street, SW, Washington, DC 20554

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**Telecommunications Carrier  
Systems Security and Integrity Plan**

**for**

**Broadcore, Inc.**

## I. Introduction

This Systems Security and Integrity Plan establishes the policies and procedures for the supervision and control of the officers, employees, and agents of Broadcore, Inc. ("Broadcore"). It is the policy of Broadcore to comply with the letter and spirit of all applicable United States electronic surveillance statutes and regulations.

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Pursuant to 47 C.F.R. § 1.20000 and the Communications Assistance for Law Enforcement Act ("CALEA"), under this Systems Security and Integrity Plan, Broadcore will:

- (a) Ensure that any interception of communications or access to call-identifying information effected within its switching premises can be activated only in accordance with appropriate legal authorization, appropriate carrier authorization, and with the affirmative intervention of an individual officer or employee of the carrier acting in accordance with regulations prescribed by the Commission; and
- (b) Implement the assistance capability requirements of CALEA section 103, 47 U.S.C. § 1002, to ensure law enforcement access to authorized wire and electronic communications or call-identifying information.

Any questions about how to comply with the policies and procedures in this Systems Security and Integrity Plan should be referred to Broadcore' counsel or to the employee appointed by Broadcore to oversee the provision of technical assistance and compliance. Contact information for this individual can be found in Appendix A.

## II. Definitions.

The definitions included in this subchapter shall be used solely for the purpose of implementing CALEA requirements.

(a) *Appropriate legal authorization.* The term *appropriate legal authorization* means:

- (1) A court order signed by a judge or magistrate authorizing or approving interception of wire or electronic communications; or
- (2) Other authorization, pursuant to 18 U.S.C. 2518(7), or any other relevant federal or state statute.

(b) *Appropriate carrier authorization.* The term *appropriate carrier authorization* means the policies and procedures adopted by telecommunications carriers to supervise and control officers and employees authorized to assist law enforcement in conducting any interception of communications or access to call identifying information.

(c) *Appropriate authorization.* The term *appropriate authorization* means both appropriate legal authorization and appropriate carrier authorization.

(d) *LEA.* The term *LEA* means law enforcement agency; e.g., the Federal Bureau of Investigation or a local police department.

(e) *Telecommunications carrier.* The term *telecommunications carrier* includes:

- (1) A person or entity engaged in the transmission or switching of wire or electronic communications as a common carrier for hire;
- (2) A person or entity engaged in providing commercial mobile service (as defined in section 332(d) of the Communications Act of 1934 (47 U.S.C. 332(d))); or
- (3) A person or entity that the Commission has found is engaged in providing wire or electronic communication switching or transmission service such that the service is a replacement for a substantial portion of the local telephone exchange service and that it is in the public interest to deem such a person or entity to be a telecommunications carrier for purposes of CALEA.

### **III. Policies and procedures for employee supervision and control.**

Broadcore requires that legal authorization in the form of a court order signed by a judge or magistrate authorizing and approving interception of wire or electronic communications; or other authorization, pursuant to 18 U.S.C. § 2518(7), or any other relevant statute as appropriate legal authorization prior to initiating any interception of communications or access to call-identifying information. Upon receipt of authorization, Broadcore has established appropriate carrier authorization policies and procedures to supervise and control officers and employees authorized to assist LEA in conducting any interception of communications or access to call-identifying information.

Broadcore has appointed a designated contact person responsible for ensuring that any interception of communications or access to call-identifying information effected within its switching premises can be activated only in accordance with a court order or other lawful authorization and with the affirmative intervention of an individual officer or employee of the carrier. The designated contact person will ensure that all employees of Broadcore receive appropriate legal authorization and appropriate carrier authorization, as defined in this manual, before enabling law enforcement officials and carrier personnel to implement the interception of communications or access to call-identifying information.

Broadcore will maintain its records of each interception of communications or access to call-identifying information pursuant to 47 C.F.R. §1.20004 for two (2) years.

Information necessary to contact the designated contact person seven days a week, 24 hours a day is attached as Appendix A.

The designated contact person will report to the affected law enforcement agencies, within a reasonable time upon discovery, any act of compromise of a lawful interception of communications or access to call-identifying information to unauthorized persons or entities, and any act of unlawful electronic surveillance that occurred on its premises.

#### **IV. Maintaining secure and accurate records.**

Broadcore shall maintain a secure and accurate record of each interception of communications or access to call-identifying information, made with or without appropriate authorization, in the form of single certification. This certification will include, at a minimum, the following information:

- (i) The telephone number(s) and/or circuit identification numbers involved;
- (ii) The start date and time that the carrier enables the interception of communications or access to call identifying information;
- (iii) The identity of the law enforcement officer presenting the authorization;
- (iv) The name of the person signing the appropriate legal authorization;
- (v) The type of interception of communications or access to call-identifying information (e.g., pen register, trap and trace, Title III, FISA); and
- (vi) The name of the person who is responsible for overseeing the interception of communication or access to call-identifying information and who is acting in accordance with the carriers' policies established under 47 C.F.R. § 1.20003.

This certification will be signed by the designated contact person listed in Appendix A. This individual is responsible for overseeing the interception of communications or access to call-identifying information and who is acting in accordance with the telecommunications carrier's policies established under 47 C.F.R. § 1.20003. The designated contact person will, by his/her signature, certify that the record is complete and accurate.

This certification will be compiled either contemporaneously with, or within a reasonable period of time after, the initiation of the interception of the communications or access to call-identifying information.

In accordance with the policies established under 47 C.F.R. § 1.20003, the designated contact person will sign the certification and append the appropriate legal authorization and any extensions that have been granted. This form of certification will include all of the information listed above.

Broadcore will maintain its records for two (2) years. Broadcore assumes full responsibility to ensure its records are complete and accurate and recognizes that violations are subject to penalties listed under 47 C.F.R. § 1.20008.

**Appendix A:**  
Designated Contact Person

*The name and a description of the job function of the senior officer or employee appointed as contact for law enforcement agencies*

*Information necessary for law enforcement agencies to contact the senior officer or employee appointed or other CALEA points of contact on a seven days a week, 24 hours a day basis.*

Full Name: Ali (Alan) Pourafzal  
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