CALEA ELECTRONIC FILING SYSTEM (CEFS) USER MANUAL



FEDERAL COMMUNICATIONS COMMISSION

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Table of Contents

Tab	ble of Contents	1
1.	Introduction	2
2.	Getting Set Up	4
	2.1 First Time CEFS Users Without an Existing FCC User Registration	4
	2.2 Resetting Lost FCC User Registration Passwords	5
	2.3 First Time CEFS Users Without an Associated or Existing FCC Registration Number	6
	2.4 Trusted Third Parties (TTP), and Filing on Behalf of Multiple Covered Entities	7
3.	Accessing CEFS	7
	3.1 Locating CEFS	8
	3.2 Sign-In to CEFS	9
	3.3 Entering CEFS User's FCC Registration Number	11
4.	Submitting System Security and Integrity (SSI) Plans	13
	4.1 Covered Entity FRN Information	13
	4.2 CALEA SSI Policies and Procedures	15
5.	Attachments	16
	5.1 SSI Plan File	16
	5.2 Confidential Treatment Justification	16
6.	Viewing Prior CEFS SSI Plan Filings	17
7.	Technical Assistance and Rules Questions	18

1. Introduction

The CALEA Electronic Filing System (CEFS)

In this manual, the Federal Communications Commission's Public Safety and Homeland Security Bureau (PSHSB or Bureau) provides instructional information regarding the Communications Assistance for Law Enforcement Act (CALEA) Electronic Filing System (CEFS).¹

In June 2022, the Bureau announced the launch of CEFS, a new filing system that allows covered entities to file System Security and Integrity (SSI) Plans confidentially and securely online, eliminating the need for paper filing.² CEFS filers may also request confidential treatment under section 0.459 of the Commission's rules. The Bureau built CEFS on a platform that integrates with the Commission Registration System (CORES) to reduce the need for filers to re-enter basic information that CORES users have already provided to the Commission. As currently designed, the system allows covered entities to file SSI Plans electronically and to retrieve, view, and update their SSI Plans filed via CEFS. CEFS encourages timely filings of new SSI Plans and updated SSI Plans and reduces the risk of filing errors that require re-submission.

In the *CEFS Announcement Public Notice*, the Bureau stated that electronic filing of SSI Plans in CEFS would initially be voluntary and proposed to make electronic filing mandatory six months later.³ On December 12, 2022, the Bureau announced the availability of CEFS for voluntary filing of SSI Plans. The transition period provided the Bureau with the opportunity to implement enhancements to ensure that CEFS is operating effectively and efficiently when mandatory electronic filing takes effect.

On May 15, 2023, the Bureau released an order amending the Commission's rules to require electronic filing of new and updated SSI Plans by entities subject to CALEA.⁴ Subsequently, the Bureau released a Public Notice announcing the June 29, 2023 effective date for mandatory electronic filing of CALEA SSI Plans for entities subject to CALEA requirements, and that public notice and related frequently asked questions can be found on the CALEA webpage: https://www.fcc.gov/calea. Covered entities that have already filed their SSI Plans by paper are not required to re-file them in CEFS, unless and until the covered entity's SSI Plan needs to be updated. Parties submitting paper filings after mandatory filing takes effect will receive a notification to submit the SSI Plan electronically through CEFS.

¹ CEFS is available at: https://www.fcc.gov/cefs.

² Public Safety Homeland Security Bureau Provides Information on Implementation of Voluntary Electronic Filing of CALEA System Security and Integrity Plans and Seeks Comment on Mandatory Electronic Filing, Public Notice, DA 22-592 (PSHSB rel. June 1, 2022) (CEFS Announcement Public Notice).

³ Public Safety Homeland Security Bureau Announces Availability Of CALEA Electronic Filing System (CEFS) For Voluntary Filing Of System Security And Integrity Plans, Public Notice, DA 22-1299 (PSHSB rel. Dec. 12, 2022) (CEFS Implementation Public Notice).

⁴ See Communications Assistance for Law Enforcement Act Electronic Filing System (CEFS), PS Docket No. 22-217, Order, DA 23-392 (PSHSB 2023) (CALEA SSI Plan Mandatory Electronic Filing Order).

CALEA

The Communications Assistance for Law Enforcement Act (CALEA) governs the technical aspects of wiretapping. CALEA requires covered entities to implement certain technical capabilities into their networks to ensure that when they are served with a court order for lawful surveillance, their networks can isolate communications identified in the court order, and deliver the communications to the law enforcement agency named in the order. Under 47 U.S.C. § 1004, telecommunications carriers are required to establish protocols to ensure they can provide those wiretaps while simultaneously safeguarding the security and integrity of their systems to prevent unauthorized intercepts of customer communications. Section 229(b) of the Communications Act, 47 U.S.C. § 229(b), require all telecommunications carriers to file SSI Plans with the Federal Communications Commission (Commission).

In 1999, the Commission first specified the requirements for telecommunications carriers' SSI Plans. In 2006, the Commission expanded CALEA's coverage to require facilities-based broadband Internet access providers and interconnected Voice over Internet Protocol (VoIP) service providers to also file SSI Plans. For purposes of this CEFS user manual, "covered entities" refers to entities subject to CALEA. Pursuant to section 1.20005 of the Commission's rules, all entities subject to CALEA must file their SSI Plans prior to commencing service and must re-file a complete updated SSI Plan within 90 days following any changes to information contained in a previously filed SSI Plan. All SSI Plans must contain all information listed under sections 1.20003 and 1.20004 of the Commission's rules, 47 CFR §§ 1.20003 and 1.20004.

⁵ 47 U.S.C. § 1002.

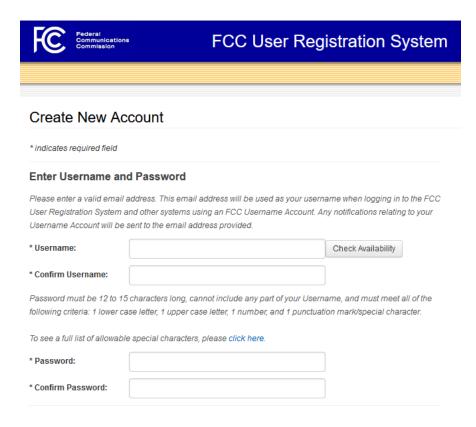
2. Getting Set Up

2.1 First Time CEFS Users Without an Existing FCC User Registration

If you wish to conduct business with the Commission, you must first create an account with a unique username and password. The FCC User Registration refers to registrant's FCC username and password. The Commission will use your FCC username to identify you in all transactions with the Commission. If you have an FCC username and password, proceed to Section 2.3 below regarding FCC Registration Number. If you do not already have an FCC username and password, you must create an account prior to logging into CEFS.

Go to the FCC User Registration System link:

<u>https://apps2.fcc.gov/fccUserReg/pages/createAccount.htm.</u> The Create Account screen, shown below, should appear. Enter all required information and select the Create Account button at the bottom of the screen.

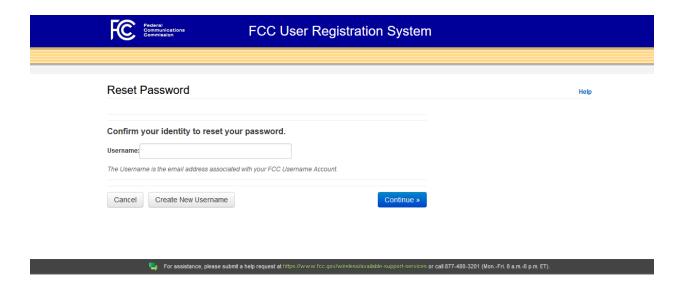


2.2 Resetting Lost FCC User Registration Passwords

To change your FCC User Registration login password, go to the following link:

https://apps2.fcc.gov/fccUserReg/pages/reset-passwd-identify.htm

This will take you to the Reset Password screen as shown below:



Enter the email address associated with your FCC User Registration account and press the "Continue" button, then follow the instructions.

2.3 First Time CEFS Users Without an Associated or Existing FCC Registration Number

To use CEFS, you must associate the FCC User Registration described in Section 2.1 "Getting Set Up" above with the FCC Registration Number (FRN) of the covered entity filing the SSI Plan. Commission rules require an FRN to be supplied by anyone doing business with the Commission. Any business or individual wishing to conduct business with the Commission must register through the Commission Registration System (CORES) to obtain an FRN. The FRN refers to a 10-digit number used to identify the registrant's business dealings with the Commission.

If you do not associate your FCC User Registration with the covered entity's FRN, or if the covered entity does not have an FRN, go to the following link to access the CORES and login with your FCC User Registration⁶ where prompted:

https://apps.fcc.gov/cores/userLogin.do

Once logged in to CORES, select either the option to "Associate Username to FRN" or "Register New FRN" as shown below and follow the instructions.

Associate Username to FRN Link your registered username to an existing FRN. Manage Existing FRNs & FRN Financial Manage FRN information, view Red & Green light status, and view & make payments. Register New FRN Register and receive a new FRN (including Restricted Use Frn). Reset FRN Password Reset/update your FRN password. Search for FRN Search for public FRN information. Update Username Profile Update your username profile.

In order to provide new staff access to a FRN account, the FRN account owner must take the following steps:

- 1. Login to CORES.
- 2. Click Managing Existing FRNs & FRN Financial as shown above.
- 3. Then, click Manage FRNs.
- 4. On the Administer Tab, click <u>List Users.</u>
- 5. Click Add a User

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⁶ For additional information, refer to https://apps.fcc.gov/cores/publicHome.do?faq=true&csfrToken= and the new Commission Registration System FAQ https://www.fcc.gov/licensing-databases/commission-registration-system-fcc (last visited on May 3, 2023).

2.4 Trusted Third Parties (TTP) Filing on Behalf of Covered Entities, and Filing on behalf of multiple entities

Entities subject to CALEA remain responsible for ensuring they are meeting all their obligations under CALEA even when employing a TTP. TTPs refer to entities that provide compliance services to entities subject to CALEA (i.e. "covered entities" for purposes of this manual). CALEA requirements apply to covered entities, not the TTPs. There is no registration requirement to provide TTP services.

In order for a TTP to file an SSI Plan for an entity subject to CALEA, the TTP will need to take the following steps:

- 1. TTP will need to create their own CORES account.
- 2. TTP will need to request FRN access from the entity subject to CALEA in the CORES system.
- 3. TTP must obtain the covered entity's FRN access approval. The TTP must obtain approval from each of the covered entities that the TTP will file plans for moving forward. The TTP must confirm that approval at system level shows at login to CEFS. Approval at the system level will mean the covered entity's FRN is now associated with the TTP's registered account.
- 4. The TTP's access approval can be confirmed once a TTP logs into CEFS and selects the covered entity's FRN. The FRN will populate in the drop-down window after following all the steps in this process. Note: If a TTP has its own CORES username, and the covered entity has its own FRN, the covered entity can log in to CORES and add or approve the TTPs username registration as formally "associated" with the FRN. In other words, the TTP can now file in CEFS for the covered entity with the covered entity's FRN.

Filing on behalf of multiple entities (also known as batch filing)

- When a filer, including a TTP, is filing on behalf of multiple commonly owned companies with the same CALEA Point of Contact, the filer must first be associated to the FRNs of each commonly owned company they are attempting to file for in CEFS. See instructions above.
- To make the association, the filer must submit an FRN association request for each commonly owned company through CORES. Once the association is completed, an automated email is sent to the requesting user notifying them their username is now associated to the FRN.
- A filer can also tell if an FRN has been successfully associated to their account if they go into CEFS and are able to see the requested FRN in the their drop down choices.
- If an FRN that you have requested does not show up on CEFS for you, then the Request has not been approved yet.
- To expedite the FRN association approval request process, you may contact the company that owns the FRN to review your request inside of CORES.
- Only the owner of the FRN can approve the association request.
- If the filer does not have appropriate FRN associations for all of the affiliates, he/she will need to file SSI Plans separately.

If you are filing on behalf of multiple entities, see Section 4.1 (that covers submitting your SSI Plan) for additional information.

Filers experiencing technical difficulties using the CEFS system or CORES should call the FCC Licensing Support Center at 877-480-3201, or submit an online help request form.

3. Accessing CEFS

3.1 Locating CEFS

To locate the CEFS application:

- 1. Go to the FCC homepage: https://www.fcc.gov/.
- 2. Click on the Browse by Category menu located at the top of the page. Note: This menu allows users to view six separate drop-down menus.
- 3. Click on Licensing & Databases, shown here:



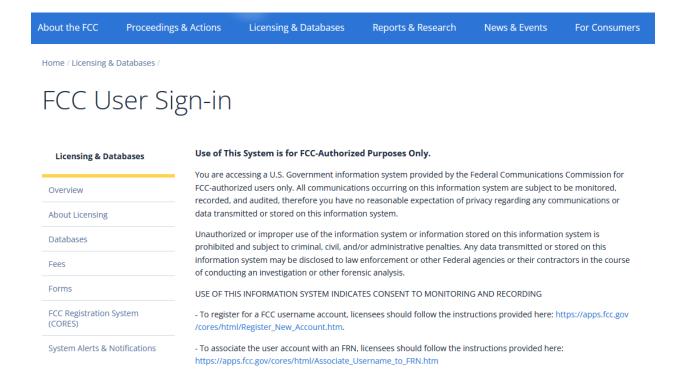
4. Click on the CEFS link, which will appear among the list of databases:

tions	Licensing & Da	tabases Rep	orts & Research	News & Events	For Cor
	ASR	DIRS	ETRS	MyIBFS	ТСВ
	CDBS	EA	GenMen	NORS	TCNS
	CEFS	ECFS	HAM	PIF	ULS
	COALS	EDOCS	KDB	PSIX-ESIX	VPD
	CORES	ELS	KIDVID	RLD	
	CSRS	ETFS	LMS	SADCS	

Note: As an alternate to steps 1-4, you can also access CEFS by clicking or inserting the following URL into a browser: https://www.fcc.gov/licensing-databases/fcc-user-login

3.2 Sign-In to CEFS

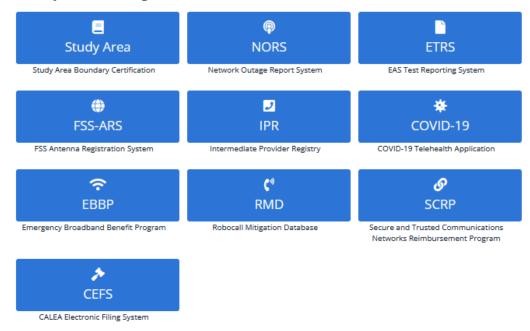
Selecting the FCC CEFS link connects you to the FCC User Sign-in page, shown below:



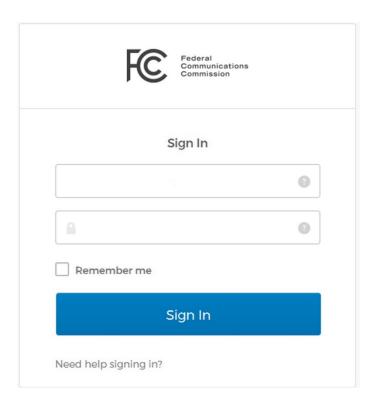
Note: Be sure to collect any information you might need to input for your covered entity because CEFS sessions time out after 30 minutes.

At the bottom of that page will be a link to enter CEFS and file your SSI Plan as shown below:

Please select a system below to sign-in.

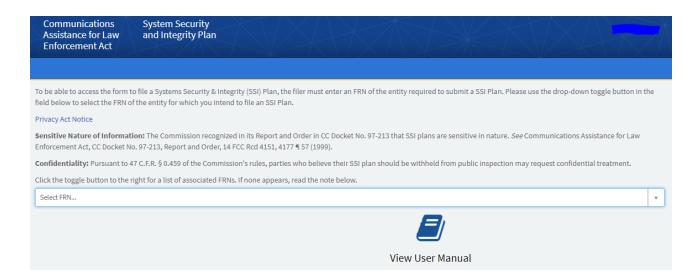


Click on the CEFS icon and the login screen will appear as shown below. Enter your FCC User Registration login and password.



3.3 Entering CEFS User's FCC Registration Number

Upon logging in with your FCC User Registration username and password, you will be prompted to select an FRN as shown in the image below. The FRNs in the drop down are the FRNs that are associated to your FCC user registration. If there are no FRNs available in the drop down, you will need to consult with the covered entity you are filing for, to associate to the covered entity's FRN. The landing page provides a link that will redirect you to CORES to login and initiate the request to associate to a covered entity's FRN.



Once you select an FRN for the covered entity in which you are filing for, a "File SSI Plan" icon will appear. Click "File SSI Plan" to access the portal intake form for submitting the covered entity's SSI Plan.



If the covered entity associated with the FRN entered into the CEFS database has multiple FRNs in CORES, there should be a drop-down list of FRNs that allow you to select the appropriate FRN associated with the covered entity for which SSI-plan information is to be supplied.

Once you select the FRN, and click on the SSI Plan icon, the form will load, and the screen should populate fields showing the information associated with that FRN (the "FRN Data fields").

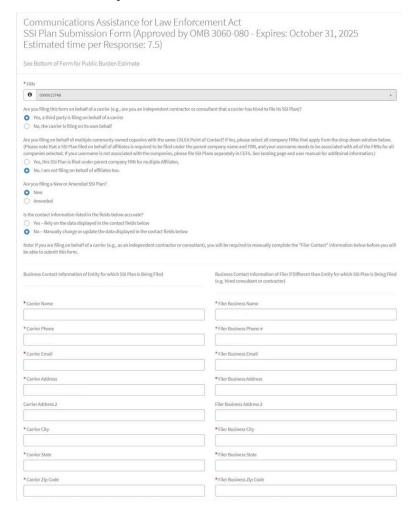
CEFS should then present you with two options to identify the covered entity filing the SSI plan (the "Filing Entity fields"). Either (1) rely on the covered entity name displayed in the FRN Data Fields to populate the Filing Entity Fields; or (2) manually enter into the Filing Entity Fields the name of the covered entity filing the SSI plan.

4. Submitting System Security and Integrity (SSI) Plans

4.1 Covered Entity FRN Information

Once the user accesses the intake form, all information associated to the FRN record that the user chose on the landing page will prepopulate in the "Business Contact" fields. The contact information for the person doing the filing will populate in the "Filer" fields which is linked to the CORES account of the user doing the filing. The user has the option to move forward with the information presented by keeping "Rely on the company name displayed" button clicked. All fields will remain grayed out.

If the user wants to change any information, click the button that reads "Manually enter the name of the company for which the SSI plan is being filed." "Carrier Name," "Carrier Phone Number," and "Carrier Email" are all required fields to be able to submit the form as shown below.



Note: All contact information entered will be used to reach out to applicable parties if form data is incorrect after submission.

Note: All the fields are required except Address 2. Before external users submit the form, they need to make sure that all information is filled in correctly.

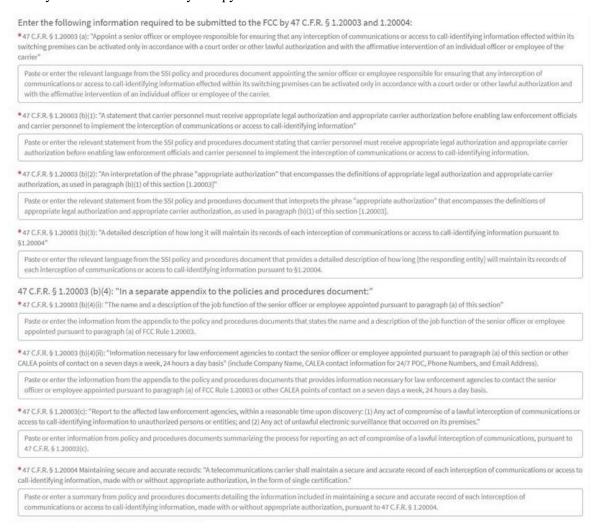
Alternatively, if the filer is submitting on behalf of multiples covered entities, the filer would mark yes and choose entities from the "List Affiliates" drop down window. See below.

Subsequently, affiliate details should populate underneath in the "Affiliate Details" field to confirm your selection. Please be sure the correct entity is selected. See below.

Are you filing this form on behalf of a carrier (e.g., are you an independent contractor or consultant that a carrier has hired to file its SSI Plan)?
Yes, a third party is filing on behalf of a carrier
O No, the carrier is filing on its own behalf
Are you filing on behalf of multiple commonly owned copanies with the same CALEA Point of Contact? If Yes, please select all company FRNs that apply from the drop down window below. (Please note that a SSI Plan filed on behalf of affiliates is required t
Yes, this SSI Plan is filed under parent company FRN for multiple Affiliates.
No, I am not filing on behalf of affiliates too.
*List affiliates.
Affiliate Details

4.2 CALEA SSI Policies and Procedures

The remainder of the fields on the intake form request information to help ensure compliance with certain CALEA SSI requirements in the Commission's regulations. CEFS requires you to proceed through the form and enter information into all text fields shown below. This information can and should come directly from the covered entity's copy of their SSI Plan.



The last question on the form requires the user to select either the "Yes" or "No" button for confidential treatment. If "Yes" is selected, an additional attachment requesting confidential treatment is required. Move to next section to learn how to upload attachments.

* Do	you	request	confidential treatment under 47 CFR § 0.459?	
0	Yes	0	No	

5. Attachments

5.1 SSI Plan File

A soft copy of the SSI Plan that the covered entity will be keeping on file is required to be attached to the intake form. This uploaded copy of the SSI Plan must describe all SSI information, policies, procedures, and recordkeeping compliance requirements specified at 47 CFR §§ 1.20003 and 1.20004, including all descriptions separately entered in the intake form. Click the 'Required-Upload' button at the bottom of the form under the line that reads, "Attach System Security and Integrity Plan" and the "Important Reminder" information as shown below.



If you upload an incorrect file and would like to upload a new one, you can delete the attachment by clicking the "X Delete" button to the bottom right of the attachment.



5.2 Confidential Treatment Justification

If you select "Yes" to requiring confidential treatment under 47 CFR § 0.459, the intake form will require you to upload a justification document. To upload this document, click the "Required-Upload" button under the line that reads, "Because you have selected 'Yes' as a response to the question asking if you seek confidential treatment under 47 CFR § 0.459, please submit a justification for confidential treatment in addition to your SSI Plan."

*Because you have selected 'Yes' as a response to the question asking if you seek confidential treatment under 47 CFR § 0.459, please submit a justification for confidential treatment in addition to your SSI Plan.



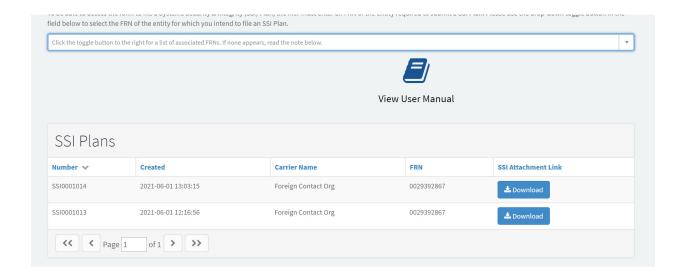
If you upload an incorrect file and would like to upload a new one, you can delete the attachment by clicking the "X Delete" button to the bottom right of the attachment.

At this point, you should have two documents attached to be able to submit the SSI plan. If no confidential treatment justification was needed, you will only need one document to submit the SSI plan. The form will prompt you on how many attachments are needed for a complete submission.

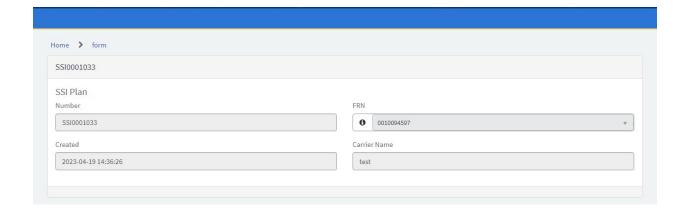
6. Viewing Prior CEFS SSI Plan Filings

Once you have filed an SSI Plan in CEFS, you can log back into the system to view your past electronic filings. You can only view past electronic SSI filings for the FRN associated with your FCC User Registration.

After logging in to CEFS using your FCC User Registration, you will reach the main CEFS start screen. The prior CEFS-filed SSI Plans associated with your associated FRN(s) will be shown below the buttons, along with the date-filed. Click on the entries to view the SSI Plans as shown below. Click on the "Download" button to download a copy of the SSI Plan. If you have questions about any paper-filed SSI Plans, please send an email to FCC-CALEAinquiries@fcc.gov.



Here you can view all past electronic filings for the FRN associated with your FCC User Registration and either download your SSI plan, or click the entry to view the following screen:



7. Technical Assistance and Rules Questions

Filers experiencing technical difficulties using the CEFS system or CORES should call the FCC Licensing Support Center at 877-480-3201, or submit an <u>online help request form</u>.

Any questions you have concerning the regulatory requirements for CALEA SSI Plans, please visit the CALEA webpage at https://www.fcc.gov/calea or send an email to FCC-CALEAinquiries@fcc.gov.