

RECEIVED

SEP 15 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

In the Matter of)
)
Communications Assistance for)
Law Enforcement Act) CC Docket No. 97-213

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS)**

Submitted by,

Megan L. Campbell
General Counsel
ATIS
1200 G Street, N.W.
Suite 500
Washington, D.C. 20005
202-434-8847
mcampbel@atis.org

Dated: September 15, 2000

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS
INDUSTRY SOLUTIONS (ATIS)**

ATIS submits these comments in response to the Commission's public notice issued In the Matter of Communications Assistance for Law Enforcement Act soliciting comments on the petition filed by the Cellular Telecommunications Industry Association (CTIA) regarding the suspension of the September 30, 2001 compliance date for the "punch list" and packet-mode communications capabilities required by the Third Report and Order in the same proceeding. Specifically, ATIS provides information regarding the recently held CALEA Legal Summit and the consensus of the industry members present at that Summit to support the CTIA petition for a suspension of the compliance date.

ATIS hosted the CALEA Legal Summit on September 14, 2000 in Washington, D.C. The Summit was organized¹ to provide a venue for the industry to identify and discuss the relevant issues and considerations with respect to the CALEA industry standards, from both a legal and engineering perspective, given the U.S. Court of Appeals for the District of Columbia decision. Perhaps the strongest factor in planning the Summit was the fact that pivotal decisions regarding the disposition of J-STD-025 and its ANSI counterpart are scheduled to be discussed at the TR45.2 meeting in Seoul, Korea next week². Many U.S companies with a stake in the outcome of those decisions

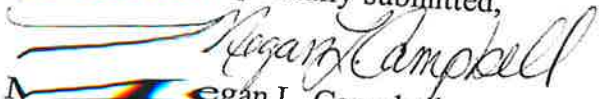
¹ The Steering Committee that planned the Summit included: Ed Hall, ATIS VP of Technology; Cheryl Bloom, TR45.2 Chairman; Terry Watts, TR45.2 Vice Chairman; Terri Brooks LAES Ad Hoc Chairman; Benjamin Ederington, Counsel to TIA; Al Gidari, Counsel to CTIA, Gary Pellegrino, LAES Ad Hoc Vice Chairman; Peter Musgrove, TIA Packet Data JEM, Chairman.

² The Lawfully Authorized Electronic Surveillance (LAES) Ad Hoc Group formed plenary recommendations during the August 22-23, 2000 meeting for consideration at TR45.2. The recommendations provide the basis for the decisions regarding the disposition of J-STD-025 and its ANSI counterpart. The LAES Ad Hoc Group exists as a subgroup to TR45.2 and includes participation from CTIA, ATIS/Committee T1, USTA and law enforcement representatives.

The plenary recommendations as recorded in the Draft Meeting Report of the LAES Ad Hoc are as follows: (1) J-STD-025 be forwarded to ANSI for publication; (2) ANSI publication of J-STD-025A be suspended; (3) notification of the U.S. Court of Appeals decision and a summary of how that decision affects the content of J-STD-025A be sent to all companies having a copy of the Interim Standard; and, (4) a project number be requested for work on a new revision of J-STD-025A to isolate the two capabilities [punch-list items] not vacated by the court decision.

acknowledged that they would not be able to send representation to the TR45.2 meeting given the issues and considerations for those industry members who would be attending the Korea meeting.³

While the product or quantifiable benefits of the Summit largely exist in the discussion that took place and the issues and considerations aired, as noted above, the industry participants in attendance did indicate unanimous support for the CTIA petition requesting extension of the September 30, 2001 compliance date. The specific question was whether attendees "Support[ed] the CTIA petition for the extension of the September 2001 compliance date for the 2 punch list items and packet data." As an indication where the industry support lies, an attendee list from the Summit is attached to the comments.

Respectfully submitted,

Megan L. Campbell
General Counsel
ATIS
1200 G Street, N.W.
Suite 500
Washington, D.C. 20005
202-434-8847
mccampbell@atis.org

Dated: September 2000

³ During the past week, presumably as the result of many requests, the TR45.2 leadership has indicated that certain issues regarding the disposition of J-STD-025 and its ANSI counterpart will be deferred to the next meeting scheduled for the week of October 16, 2000 in Vermont. CTIA and ATIS submitted a letter to the chair of TR45.2 requesting that certain of the LAEIS Ad Hoc recommendations regarding disposition of J-STD-025 and its ANSI counterpart be deferred until the Vermont meeting. Letter from A. Gidari, Counsel for CTIA and M. Campbell, ATIS General Counsel, to Cheryl Blum, TR45.2 (September 11, 2000) (on file with ATIS).

CALEA LEGAL SUMMIT Washington, D.C.

September 14, 2000

List of Attendees (revised)

Michael F. Altschul, CTIA	Juan-Carlos Llamas, Ericsson
Donald Auble, SBC	Joel Margolis, Nextel Communications, Inc.
Saurindra Basu, Mitel Corporation	William Marshall, AT&T
Margaret Bavuso, Verizon Wireless	Martin McCue, ATIS Chairman of the Board
Ernest Bond, BellSouth	Todd McDermott, Comverse InfoSys Technology
Hugo Bonuccelli, Mitretek Systems	Kelly McGinn, Harris, Wiltshire & Grannis
Stephanie Boyett-Colgan, Qwest Wireless LLC	Michael McMenamin, Booz-Allen & Hamilton
Terri Brooks, Nokia	Susan Miller, ATIS
Megan Campbell, ATIS	Peter Musgrove, AT&T Wireless Services
Rikke Davis, Sprint	Lloyd Nault, BellSouth
John Delmore, McDermott Will & Emery	Jim Nixon, VoiceStream
Scott Duncan, John Staurulakis, Inc.	Warren Okeson, Sprint
Benjamin Ederington, TIA	Gary Pellegrino, LEAS Ad Hoc
Mark Epstein, QualComm, Inc.	Chris Pilgrim, GVNW Consulting, Inc.
Cathy FitzPatrick, Lucent Technologies	Jessica Recel, WorldCom
Paul Gallant, Broadband Office, Inc.	Christopher Savage, Cole, Raywid & Braveman
Albert Gidari, CTIA	Roger Sherman, Sprint PCS
John Goodman, Verizon	Warren Sims, Ericsson
Ed Hall, ATIS	Daniel Smith, Wiley, Rein & Fielding
Megan Hayes, ATIS	James Smith, SBC Communications
Jennifer Hightower, Cox Communications	Lolita Smith, CTIA
Jay Hilton, Telcordia Technologies	Terri Spears, Booz-Allen & Hamilton
Anne Hoge, Wiley, Rein & Fielding	Albin Thomas, BellSouth Cellular
Tim Huntington, Signal Hill Technologies	David Thompson, TIA
David Janas, Mintz Levin et al.	Frank Triveri, Nextel Communications, Inc.
Thomas Johnston, ICO-Teledesic Global Ltd.	Pierre Truong, Ericsson
Mary Jones, VoiceStream	Robert Tyler, SBC Wireless
Kate Kaercher, OPASTCO	Robert Vitanza, SBC Communications
Linda Kent, USTA	Meg Walpole, ATIS
Susan Kimmel, FCC	David Ward, FCC
Jan King, Nortel Networks	Tim Welch, Hill & Welch
Bill Krehl, Siemens	Scott Yagel, Alcatel
Diane Law-Hsu	Danny Yong, Verizon
Ben Levitan, GTE Telecommunications, Inc.	Larry Young, Sprint PCS
