DEPARTMENT OF JUSTICE

Federal Bureau of Investigation

Implementation of Section 104 of the Communications Assistance for Law Enforcement Act

AGENCY: Federal Bureau of Investigation (FBI).

ACTION: Final notice of capacity.

SUMMARY: The FBI is providing the Final Notice of the requirements for actual and maximum capacity for the interception of the content of communications and call-identifying information that telecommunications carriers may be required to effect to support law enforcement's electronic surveillance needs, as mandated in section 104 of the Communications Assistance for Law Enforcement Act (CALEA) (Public Law 103–414, 47 U.S.C. 1001–1010). On October 16, 1995, the FBI published an Initial Notice of Capacity for comment (60 FR 53643); and on November 9, 1995, the comment period was extended until January 16, 1996. After reviewing the comments received, the FBI published the Second Notice of Capacity on January 14, 1997, for comment (62 FR 1902). Comments were accepted on the Second Notice of Capacity through March 15, 1997. After reviewing the comments received, the FBI is issuing this Final Notice of Capacity.

DATES: Effective Date: March 12, 1998.

Compliance Dates:

1. Carrier Statement Submission Compliance: September 8, 1998.

2. Capacity Compliance: March 12, 2001.

FOR FURTHER INFORMATION: Contact the CALEA Implementation Section, Federal Bureau of Investigation (FBI), P.O. Box 220450, Chantilly, Virginia 20153–0450 or call (800) 551–0336. Please refer to your question as a capacity notice question. The FBI has made this Final Notice of Capacity, as well as its associated appendixes, available on its Internet homepage (http://www.fbi.gov).

I. Background

A. Purpose of CALEA

On October 25, 1994, President Clinton signed into law the Communications Assistance for Law Enforcement Act (CALEA). Its objective is to make clear a telecommunications carrier's duty to cooperate with law enforcement with regard to electronic surveillance-related interceptions for law enforcement purposes. (For purposes of this notice, the word ''interception'' is used to refer to either the interception of call content or call-identifying information.) CALEA was enacted to preserve law enforcement's ability, pursuant to court order or other lawful authorization, to access call content and call-identifying information, including information from pen register and traps and traces, in an ever-changing telecommunications environment. On February 24, 1995, the Attorney General delegated management and administration responsibilities of CALEA to the FBI (see 28 CFR 0.85(o)). The FBI is implementing CALEA on behalf of all Federal, State, and local law enforcement.

In 1968, when Congress statutorily authorized court-ordered electronic surveillance, there were no technological limitations on the number of interceptions that could be conducted. However, the onset of new and advanced technologies has begun to erode the ability of the telecommunications industry to support law enforcement's interception needs. In an effort to preserve the ability to conduct interceptions, which is a vital investigative tool, the Congress determined that technological solutions must be employed, thereby necessitating greater levels of assistance from telecommunications carriers.

The intent of CALEA is to define and clarify the level of technical assistance required from telecommunications carriers. CALEA does not alter or expand law enforcement's fundamental statutory authority to intercept communications. It simply seeks to ensure that, after law enforcement obtains legal authority, telecommunications carriers will have the necessary technical ability to fulfill their statutory obligation to accommodate requests for assistance.

B. Capacity Notice Mandate

Because many future interceptions will be effected through equipment controlled by telecommunications carriers, CALEA obligates the Attorney General to provide carriers with information they will need (a) to be capable of accommodating the actual number of simultaneous interceptions law enforcement might conduct as of October 25, 1998, and (b) to size and design their networks to accommodate the maximum number of simultaneous interceptions that law enforcement might conduct after October 25, 1998. (Although actual and maximum capacity determinations represent estimates for October 25, 1998, and thereafter, telecommunications carrier compliance with capacity requirements is, by terms of CALEA, required 3 years after the effective date of this Final Notice of Capacity.) These two information elements are referred to in CALEA as ''actual'' and ''maximum'' capacity requirements. In accordance with section 104 of CALEA, the FBI, which has been delegated CALEA implementation responsibilities from the Attorney General, on behalf of Federal, State and local law enforcement, must provide notice of estimated future actual and maximum capacity requirements. The statute defines these requirements as follows:

For actual capacity: The actual number of communication interceptions, pen registers, and trap and trace devices, representing a portion of the maximum capacity, that the Attorney General estimates that government agencies authorized to conduct electronic surveillance may conduct and use simultaneously by the date that is 4 years after the date of enactment of CALEA.

For maximum capacity: The maximum capacity required to accommodate all of the communication interceptions, pen registers, and trap and trace devices that the Attorney General estimates that government agencies authorized to conduct electronic surveillance may conduct and use simultaneously after the date that is 4 years after the date of enactment of CALEA.

Although CALEA requires the Attorney General to estimate the actual number of communication interceptions, pen registers, and trap and trace interceptions that may be required simultaneously by the date that is four years after the date of enactment of CALEA (or three years after the effective date of this Final Notice of Capacity, whichever is longer) and thereafter, the estimates should not be interpreted as constituting the number of interceptions that law enforcement intends to, or is planning to, conduct. The number of interceptions that will actually be needed will be determined by active authorized law enforcement investigations which require interception efforts.

Under CALEA, telecommunications carriers are required to have an actual capacity available for immediate use on the date that is 3 years after the effective date of this Final Notice of Capacity. Maximum capacity, on the other hand, is a capacity level that telecommunications carriers must be able to accommodate ''expeditiously'' if law enforcement needs an increase in the future. The time frame for ''expeditious'' expansion to maximum capacity was not specified in CALEA. However, law enforcement typically maintains ongoing liaison with telecommunications carriers serving their areas. Such liaison will facilitate the needed technical capability and capacity to be prearranged, thereby ensuring that the interception can begin

as soon as the lawful authorization is received. Such liaison is critical because electronic surveillance interceptions are by their very nature time sensitive. Law enforcement considers 5 business days from a telecommunications carrier's receipt of a court order to be a reasonable period of time within which to permit an incremental expansion up to the maximum capacity. This time frame is based on past practice as to the time typically involved under existing procedures used by law enforcement and telecommunications carriers to make technical interception arrangements.

The term ''expeditious,'' as used herein, applies to section 104 capacity requirements regarding incremental expansion up to the maximum capacity. It should not be confused with ''expeditious access'' to call content and call-identifying information as used in section 103 of CALEA, which pertains to the assistance capability requirements.

Law enforcement has interpreted the maximum capacity chiefly as a requirement that telecommunications carriers will follow to determine a capacity ceiling. This ceiling is intended to provide telecommunications carriers with a stable framework for cost-effectively designing future capacity into their networks. It also would provide room for accommodating future interception-related ''worst-case scenarios.'' Establishing the maximum capacity will allow telecommunications carriers to assist law enforcement during serious, unpredictable emergencies requiring unusual levels of interception.

Consistent with CALEA, this Final Notice of Capacity identifies the number of simultaneous interceptions that a telecommunications carrier should be able to accommodate in a given geographic area as of the date that is 3 years after the effective date of this Final Notice of Capacity and thereafter. An ''interception'' relates to accessing and delivering all communications (call content) or call-identifying information associated with the telecommunications service of the subject specified in a court order or other lawful authorization. The telecommunications service targeted for interception includes all of the services and features associated with the subject's wireline/wireless telephone number, or as otherwise specified in the court order or lawful authorization.

For a call content-based ''interception'', a carrier is responsible for accessing and delivering all communications and call-identifying information supported by the subject's telecommunications service. This is the case regardless of the advanced services or features to which the subject subscribes (e.g., call forwarding used to redirect a call); and notwithstanding that the subject may be engaged in more than one communication (e.g., a subject is engaged in a voice telephone call and simultaneously sends a fax or data transmission, or a subject is engaged with several (different) parties in a conference call and simultaneously communicates with a non-conferenced party). For interceptions of call-identifying information (e.g., pen registers and trap and trace device-based interceptions), a carrier is responsible for accessing and delivering all call-identifying information related to the communications that is generated or received by the subject, regardless of the advanced services or features to which the subject subscribes.

The fact that a subject utilizes advanced services and features as part of his/her telecommunications service or is capable of sending or receiving more than one communication simultaneously does not mean that carrier access and delivery of each constitutes a separate interception. Consequently, telecommunications carriers need to ensure that, regardless of their solutions (which may be varied), the solution permits access and delivery of all of the communications or call-identifying information for each interception as specified by the interception order. Because of this circumstance, and because CALEA forbids the Government from dictating solutions, law enforcement will be available to consult and work with carriers as they develop solutions.

In some instances a telecommunications carrier may be able to meet the assistance capability requirements without modifying its equipment, facilities, or services. As a practical matter, conventional methods of effectuating interceptions of call content and call-identifying information, such as loop extender technologies, may meet the requirements of CALEA for some subjects of court-ordered interceptions, depending on the types of services and features to which the subject subscribes. Telecommunications carriers that presently meet these requirements under the circumstances described above will be in compliance until their equipment, facilities, or services are replaced or significantly upgraded or otherwise undergo major modification. Furthermore, telecommunications carriers that cannot meet the assistance capability requirements may still be considered to be in compliance if the Government does not agree to reimburse such carriers for modifications to equipment, facilities, and services installed or deployed on or before January 1, 1995. Such carriers will continue to be in compliance with CALEA until such time as their equipment, facilities, or services are significantly upgraded, replaced, or otherwise undergo major modification.

C. Initial Notice of Capacity

On October 16, 1995, law enforcement's proposed estimated future actual and maximum capacity requirements were presented in an Initial Notice of Capacity published in the **Federal Register** as mandated by section 104 of CALEA. On November 9, 1995 the industry comment period was extended until January 16, 1996. The Initial Notice and the comments on it were summarized in Section V of the Second Notice of Capacity, published in the **Federal Register** on January 14, 1997 (62 FR 1902).

D. Second Notice of Capacity

Following the release of the Initial Notice of Capacity, law enforcement consulted with telecommunications industry representatives, privacy advocates, and other interested parties to receive feedback on the method used to express estimated future actual and maximum capacity requirements. This consultative process assisted law enforcement in understanding the challenges facing the industry and others in applying the capacity requirements. After deliberation, law enforcement refined its approach of defining capacity requirements and issued a Second Notice of Capacity, published in the **Federal Register** on January 14, 1997 (62 FR 1902) to more fully articulate estimated future actual and maximum capacity requirements. Comments on the Second Notice of Capacity were accepted through March 15, 1997. The comments and the responses to the comments filed regarding the Second Notice of Capacity are summarized in Section VII of this notice. After the publication of the Second Notice of Capacity, law enforcement received comments and recommendations from telecommunications industry representatives, privacy advocates, and other interested parties on the method used to express future actual and maximum capacity requirements.

E. Final Notice of Capacity

This Final Notice of Capacity is being issued after careful consideration of the submitted comments to the Second Notice of Capacity. During a pre-publication review, the Government

determined that for some purposes this Final Notice of Capacity had the force and effect of a rule, therefore certain administrative and regulatory requirements needed to be met prior to publication. This notice fulfills the obligations of the Attorney General under section 104(a)(1) of CALEA. As mandated by section 104(d), telecommunications carriers have 180 days after the effective date of this Final Notice of Capacity to submit a Carrier Statement to the Government identifying any of their systems or services that do not have the interception capacity set forth in this Final Notice of Capacity to accommodate CALEA's section 103 requirements.

CALEA applies to all telecommunications carriers as defined in section 102(8). Capacity notices will eventually be issued covering all telecommunications carriers. However, this Final Notice of Capacity should be viewed as the first phase applicable to telecommunications carriers offering services that are of most immediate concern to law enforcement—that is, those telecommunications carriers offering local exchange services and certain commercial mobile radio services, specifically cellular service and personal communications service (PCS). For the purpose of this notice, PCS is considered a service operating in the licensed portion of the 2 GHz band of the electromagnetic spectrum, from 1850 MHz to 1990 MHz. Telecommunications carriers offering local exchange services are referred to hereafter in this notice as ''wireline'' carriers, and telecommunications carriers offering cellular and PCS services are referred to as ''wireless'' carriers.

Generally speaking, resellers of telecommunications services (''resellers'') lease some portion of a host carrier's facilities which allows the transmission or switching of wireline, wireless or other electronic communications. Resellers holding themselves out for hire to the public in the provision of telecommunications services subjects resellers, as telecommunication carriers under CALEA, to the obligations of CALEA. For purposes of this Notice of Capacity, law enforcement believes that a reseller and its host carrier can be treated collectively, as a single entity, given their common utilization of network equipment, facilities, and services to which CALEA addresses itself. This Notice of Capacity does not address resellers' and host carriers' independent obligations to ensure compliance with other provisions within CALEA.

The exclusion from this notice of certain other telecommunications carriers that have services deployed currently or anticipate deploying services in the near term does not exempt them from any obligations under CALEA. Law enforcement will consult with these other telecommunications carriers before applicable capacity requirements are established and subsequent notices are issued. Law enforcement looks forward to consulting with these other telecommunications carriers to develop a reasonable method for characterizing capacity requirements for them.

II. Applicable Administrative Procedures and Executive Orders

A. Small Business Regulatory Enforcement Fairness Act of 1996

The Final Notice of Capacity is not a major rule as defined by the Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA),[1] based upon an assessment that this Final Notice of Capacity will not have an annual effect on the economy of $100,000,000 or more; will not cause a major increase in costs or prices; and will not result in a significant adverse effect on competition, employment, investment, productivity, and innovation, or on the ability of United States-based companies to compete with foreign-based companies in domestic and export markets.

B. Executive Order 12612

The Final Notice of Capacity will not have a substantial direct effect on the States, on the relationship between the Federal Government and the States, or on the distribution of power and responsibilities among the various levels of government. Therefore, in accordance with Executive Order 12612, it has been determined that this notice does not create sufficient federalism implications to warrant the preparation of a Federalism Assessment.

C. Information Collection

The Final Notice of Capacity contains no information collection or recordkeeping requirements under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*). Section V of this notice details the information collection requirement associated with the Carrier Statement to be submitted by carriers.

D. Executive Order 12988

The Final Notice of Capacity meets the applicable standards set forth in sections 3(a) and 3(b)(2) of Executive Order 12988, Civil Justice Reform.

E. Executive Order 12866

This Final Notice of Capacity has been drafted and reviewed in accordance with Executive Order 12866, § 1(b), Principles of Regulation. It has been determined that this notice is not a ''significant regulatory action'' under Executive Order 12866, § 3(f), Regulatory Planning and Review and, in particular, that this notice will neither have an annual economic impact on the economy in excess of $100,000,000, nor will it economically impact State and local governments.[2] Although not required by Executive Order 12866, this notice has been informally reviewed by the Office of Management and Budget (OMB).

Economic Assessment

Using a per intercept cost of $460,[3] the only cost estimate provided by the industry, the FBI estimates that industry compliance will not exceed $28,926,667 in any one year and will cost a total of $86,780,000 over a three year period. Law enforcement estimates that the time frame for capacity to be deployed is three years. If the time is greater than three years then the annual costs will decrease. Total estimated costs are apportioned as follows: $71,300,000 for local exchange carriers and $15,480,000 for commercial radio, cellular and PCS service providers based on the wireline and wireless capacity requirements published in the appendixes of this Final Notice of Capacity. Furthermore, it should be noted that carrier capacity compliance costs for equipment, facilities or services identified on a Carrier Statement, to be submitted within 180 days of the effective date of this Final Notice of Capacity, may be eligible for Government reimbursement. Until the Attorney General agrees to reimburse a carrier for such modifications, that carrier's equipment, facilities or services shall be considered compliant with this Final Notice of Capacity.[4] Capacity costs associated with any equipment, facilities or

[1] See Subtitle II of the Contract with America Advancement Act of 1996, Pub. L. No. 104–121, 110 Stat. 847 (1996).

[2] H. Rep. No. 103–827, 103d Cong., 2d Sess., reprinted in 1994 U.S.C.C.A.N. 3489, 3505, Page 34.

[3] Among all the comments to both the Initial Notice of Capacity and the Second Notice of Capacity, GTE, in its comments to the Second Notice of Capacity, was the only respondent to provide estimated capacity costs. The cost of $460 per intercept is based on the following criteria: (a) each intercept would require the necessary hardware to provide law enforcement with two channels, (b) the equipment used to meet the capacity requirements would be dedicated solely for law enforcement use, and (c) the $460 represents an average cost of intercept equipment and could vary between $453 and $470.

[4] CALEA, Section 104(e).

services deployed after the Carrier Statement period of 180 days following the effective date of this Final Notice of Capacity will not be eligible for reimbursement.

F. Unfunded Mandates Reform Act of 1995

A Government analysis of the Unfunded Mandates Reform Act (UMRA) has determined this Final Notice of Capacity will not result in the expenditure by State, local or tribal governments, in the aggregate, or by the private sector, of $100,000,000 or more in any one year, and it will not significantly or uniquely affect small governments. Therefore, no actions are necessary under the provisions of the Unfunded Mandates Reform Act of 1995 (UMRA). Even so, the FBI has voluntarily abided by the tenets of the UMRA throughout this final notice.

G. Regulatory Flexibility Act—Final Regulatory Flexibility Analysis (FRFA)

The Regulatory Flexibility Act (RFA) (5 U.S.C. 601 *et seq.*, as amended) requires that an Initial Regulatory Flexibility Analysis (IRFA) be prepared and published with all proposed rules. Earlier analysis by the Government did not indicate that the Initial Notice of Capacity satisfied the criteria set forth in Section 603(a) of the RFA, requiring completion of an IRFA. However, upon review of comments submitted in response to both the Initial and Second Notices of Capacity, and upon further consideration by DOJ's Office of Policy Development, it has been determined that this Final Notice of Capacity does fall within the scope of the RFA. Therefore, the following Final Regulatory Flexibility Analysis (FRFA) has been completed in accordance with the requirements of Section 604 of the RFA.

Need for and Objectives of This Final Notice

The Final Notice of Capacity implements section 104(a) of the Communications Assistance for Law Enforcement Act (CALEA) (Public Law 103–414), which requires the Attorney General to publish notice of the estimated future actual and maximum capacity requirements that telecommunications carriers may be required to effect in support of electronic surveillance. The capacity requirements serve as a means to preserve law enforcement's ability, pursuant to court order or other lawful authorization, to access call content and call-identifying information in an ever-changing telecommunications environment.

Description and Estimate of the Number of Small Entities To Which the Final Notice Will Apply

The Regulatory Flexibility Act defines small entity as having the same meaning as the terms small organization, small government jurisdiction, and small business concern. Of these definitions of small entity, this Final Notice of Capacity is applicable only to small business concerns.[5] The Small Business Act (15 U.S.C. 632) defines a small business concern as one that (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) meets any additional criteria established by the Small Business Administration (SBA). More specifically, small business concerns within Standard Industrial Classification (SIC) categories 4812 (Radiotelephone Communications) and 4813 (Telephone Communications, Except Radio Telephone) are defined by the SBA as those having 1,500 or fewer employees. The statutory and SBA definitions of ''small business concern'' were used for purposes of this FRFA analysis.

Total Number of Telephone Companies Affected. The capacity requirements presented herein may have a significant effect on a minimal number of telephone companies defined as small businesses by the SBA. The U.S. Bureau of the Census (the Census Bureau) reports that, at the end of 1992, there were 3,497 firms engaged in providing telephone services for at least 1 year.[6] This number contains a variety of different categories of providers, including local exchange carriers (LEC), interexchange carriers, competitive access providers, cellular carriers, mobile service carriers, and PCS providers. Some of those 3,497 telephone service firms may not qualify as small business concerns or small incumbent LECs because they are not ''independently owned and operated.''[7] For example, a PCS provider that is affiliated with an interexchange carrier having more than 1,500 employees would not meet the definition of a small business concern. Consequently, the FBI estimates that fewer than 3,497 telephone service firms would qualify as small business concerns and be affected by this Final Notice of Capacity.

Wireline Carriers and Service Providers. The SBA has developed a definition of small business concerns that are telecommunications companies other than radiotelephone (wireless) companies (Telephone Communications, Except Radiotelephone). The Census Bureau reports that 2,321 such telephone companies were in operation for at least 1 year at the end of 1992.[8] Employing the SBA's definition, a small business telephone company other than a radiotelephone company is one with 1,500 or fewer employees.[9] Of the 2,321 non-radiotelephone companies listed by the Census Bureau, 2,295 were reported to have fewer than 1,000 employees. Thus, at least 2,295 non-radiotelephone companies might qualify as small entities or small incumbent LECs based on employment statistics. Since it is certain that some of these carriers are not independently owned and operated, this figure overstates the actual number of non-radiotelephone companies that would constitute small business concerns under the SBA's definition. Consequently, the FBI estimates that there are fewer than 2,295 small entity telephone communications companies (other than radiotelephone companies) that may be affected by this Final Notice of Capacity.

Local Exchange Carriers. Neither the FCC nor the SBA has developed a definition of small providers of local exchange services. The closest applicable definition under SBA rules is that of telephone communications companies other than radiotelephone (wireless) companies.[10] The most reliable source of information regarding the number of LECs nationwide, of which the FBI is aware, appears to be the data that the FCC collects annually in connection with the TRS Worksheet.[11] According to most recent data, 1,347 companies reported that they were engaged in the provision of local exchange services.[12] As some of these carriers have more than 1,500 employees, the FBI is unable to estimate with greater precision the number of LECs that would qualify as small business concerns under the SBA's

[5] Actual and maximum capacity requirements apply to all telecommunications carriers as defined in section 102(8) of CALEA. This Final Notice of Capacity, however, is intended to apply only to providers of local exchange service, commercial mobile radio service, cellular service, and personal communications services (PCS).

[6] United States Department of Commerce, Bureau of the Census, 1992 Census of Transportation, Communications, and Utilities: Establishment and Firm Size, at Firm Size 1–123 (indicating only the number of such firms engaged in providing telephone service and not the size of such firms) (1995) (1992 Census).

[7] 15 U.S.C. § 632(a)(1).

[8] 1992 Census, supra, at Firm Size 1–123.

[9] 13 CFR § 121.201, SIC 4812.

[10] 13 CFR § 121.201, SIC 4813.

[11] Federal Communications Commission, Industry Analysis Division, Telecommunications Industry Revenue: TRS Fund Worksheet Data, (Average Total Telecommunications Revenue Reported by Class of Carrier) (Dec. 1996) (TRS Worksheet).

[12] TRS Worksheet at Tbl. 1.

definition. Consequently, the FBI estimates that there are fewer than 1,347 small incumbent LECs that may be affected by this Final Notice of Capacity.

Competitive Access Providers. Neither the FCC nor the SBA has developed a definition specifically applicable to small entities that are providers of competitive access services (CAPs). The closest applicable definition under the SBA rules is that of telephone communications companies other than radiotelephone (wireless) companies.[13] The most reliable source of information regarding the number of CAPs nationwide, of which the FBI is aware, is the data the FCC collects annually in connection with the TRS Worksheet. According to most recent data, 57 companies reported that they were engaged in the provision of competitive access services.[14] The FBI has no information on the number of carriers that are independently owned and operated, nor on those that have 1,500 or fewer employees and thus is unable to estimate with greater precision the number of CAPs that would qualify as small business concerns under the SBA's definition. Consequently, the FBI estimates that there are fewer than 57 small entity CAPs that may be affected by this Final Notice of Capacity.

Radiotelephone (Wireless) Carriers. The SBA has developed a definition of small business concerns for radiotelephone (wireless) companies. The Census Bureau reports that there were 1,176 wireless companies in operation for at least 1 year at the end of 1992.[15] According to the SBA's definition, a small business radiotelephone company is one employing 1,500 or fewer persons.[16] The Census Bureau also reported that 1,164 radiotelephone companies had fewer than 1,000 employees. Thus, even if all of the remaining 12 companies had more than 1,500 employees, there would still be 1,164 radiotelephone companies that might qualify as small business concerns if independently owned and operated. Because of the lack of information on the number of carriers that are independently owned and operated, the FBI is unable to estimate with greater precision the number of radiotelephone carriers and service providers that would qualify as small business concerns under the SBA's definition. Consequently, the FBI estimates that there are fewer than 1,164 small business concerns considered radiotelephone companies that may be affected by this Final Notice of Capacity.

Cellular Service Carriers. Neither the FCC nor the SBA has developed a definition of small entities specifically applicable to providers of cellular services. The closest applicable definition under the SBA rules is that of radiotelephone (wireless) companies (SIC 4812). The most reliable source of information regarding the number of cellular service carriers nationwide, of which the FBI is aware, is the data the FCC collects annually in connection with the *TRS Worksheet.* According to most recent data, 792 companies reported that they were engaged in the provision of cellular services.[17] The FBI has no information on the number of carriers that are independently owned and operated, nor on those that employ 1,500 or fewer persons, and thus is unable to estimate with greater precision the number of cellular service carriers that would qualify as small business concerns under the SBA's definition. Consequently, the FBI estimates that there are fewer than 792 small entity cellular carriers that may be affected by this Final Notice of Capacity.

Broadband Personal Communications Service (PCS) Licensees. The broadband PCS spectrum is divided into six frequency blocks designated A through F and the FCC has held auctions for each block. The FCC has defined small entity in the auctions for C and F Blocks as an entity that earned average gross revenues of less than $40 million in the three previous calendar years.[18] For F Block, an additional classification of very small business was added and is defined as an entity that, together with its affiliates, earned average gross revenues of not more than $15 million for the preceding three calendar years.[19] These regulations, defining small entity in the context of broadband PCS C Block auctions, have been approved by the SBA. No small businesses within the SBA-approved definition bid successfully for licenses in A and B Blocks. There were 90 winning bidders that qualified as small entities in the C Block auctions. A total of 93 small and very small business bidders won approximately 40 percent of the 1,479 licenses for D, E, and F Blocks. However, licenses for C, D, E, and F Blocks have not been awarded fully; therefore few, if any, small businesses currently provide PCS services. Based on this information, the FBI concludes that the number of small broadband PCS licensees will include the 90 winning bidders and the 93 qualifying bidders in the D, E, and F Blocks, for a total of 183 small PCS providers as defined by the SBA and the FCC's auction rules.

Rural Radiotelephone Service. The FCC has not adopted a definition of small business specific to Rural Radiotelephone Service, which is defined in Section 22.99 of the FCC's Rules.[20] A subset of Rural Radiotelephone Service is basic exchange telephone radio systems (BETRS).[21] Accordingly, the FBI will use the SBA's definition applicable to radiotelephone companies, i.e., an entity employing 1,500 or fewer persons. There are approximately 1,000 Rural Radiotelephone Service licensees; the FBI estimates that a large majority of them may qualify as small entities under the SBA's definition.[22]

Reporting, Recordkeeping, and Other Compliance Requirements

The Final Notice of Capacity does not impose reporting or record keeping requirements[23] on the entities to which it applies. It does, however, administer compliance requirements, as defined in Appendixes A through D of this notice.

Summary and Analysis of Significant Issues Raised by Public Comments

On October 16, 1995, the FBI published an Initial Notice of Capacity for comment (60 FR 53643). On November 9, 1995 the industry comment period was extended until January 16, 1996. After reviewing comments in response to the Initial Notice of Capacity, the FBI published a Second Notice of Capacity (62 FR 1902). Comments on the Second Notice of Capacity were accepted from January 14, 1997, through March 15, 1997. Upon review of comments submitted in response to both the Initial and Second Notices of Capacity, it was determined that issues and sentiments specific to small entities were not only represented, but also shared by industry as a whole. A detailed summary of comments is presented in Section VII of

[13] 13 CFR § 121.201, SIC 4813.

[14] TRS Worksheet at Tbl. 1.

[15] 1992 Census at Firm Size 1–123.

[16] 13 CFR § 121.201, SIC 4812.

[17] TRS Worksheet at Tbl. 1.

[18] See Amendment of Parts 20 and 24 of the FCC's Rules—Broadband PCS Competitive Bidding and the Commercial Mobile Radio Service Spectrum Cap, Report and Order, 11 FCC Rcd 7824 (1996).

[19] See Amendment of Parts 20 and 24 of the FCC's Rules—Broadband PCS Competitive Bidding and the Commercial Mobile Radio Service Spectrum Cap, Report and Order, 11 FCC Rcd 7824 (1996).

[20] 47 CFR § 22.99.

[21] See 47 CFR §§ 22.757—22.759.

[22] 13 CFR § 121.201, SIC 4812.

[23] To the extent that CALEA compliance may entail reporting and recordkeeping requirements, those issues are separate from the capacity requirements covered in this Final Notice of Capacity and are the subject of a pending proceeding before the FCC. (Communications Assistance for Law Enforcement Act, CC Docket No. 97–213, released October 10, 1997).

the notice. Those of particular interest to small entities are reviewed below.

Burden on small companies. Small business commenters or organizations representing small business interests expressed concern that projected capacity requirements pose a disparate economic burden on small telecommunications carriers that serve areas in which a single historical incident involving a large of number of simultaneous interceptions occurred. Commenters were also concerned that the methodology used to develop the projected capacity requirements relies far too heavily on unusually high historical incidents and ignores routine levels of interception activity over time. One commenter stated that ''a carrier serving a small town, with 1,000 access lines, could have a greater capacity burden than NYNEX in New York City if the small carrier had experienced a single incident of major criminal activity 15 years ago.'' [24] As stated in Section III of the Notice (Methodology for Projecting Capacity Requirements), law enforcement's capacity requirements were estimated by considering historical surveillance statistics and industry survey data. Furthermore, as the notice explains, historical intercept activity was measured for the period January 1993 through March 1995. Any intercept activity before that time was not considered and, therefore, is not an influential factor in estimating current capacity requirements. However, taking into consideration that intercept activity may have occurred before or after the data collection period, a historic capacity requirement of one is used as the basis for estimating actual and maximum capacity requirements for those geographic areas with no reported interceptions during the survey period.

Small business commenters or organizations representing small business interests stated that historical intercept activity should not be the only factor considered to derive capacity requirements; carriers' market size and number of subscribers should also be considered.[25] As indicated in Section III of the Notice, no conclusive correlation exists between the variables ''location of criminal activity'' and ''carrier size.'' Although some large carriers may serve high crime regions and, likewise, some small carriers low crime regions, no causal relationship exists. Consequently, law enforcement's historical analysis of electronic surveillance activity was based on geographic location and the actual occurrence of surveillance interceptions. Again, available data does not indicate that a statistically valid relationship exists between law enforcement capacity requirements and carrier size, whether size is determined by subscriber lines, geographic boundaries, or any other measure.

Steps Taken To Minimize Burdens on Small Entities

The FBI's guiding principle in the development of this Final Notice of Capacity was to allow the maximum range of compliance options to carriers based on configurations of their respective networks. The rule was crafted to require a minimal level of estimated capacity that allows law enforcement to effectively meet public safety needs. CALEA's mandate, which requires that this Final Notice of Capacity identify actual and maximum capacity requirements, allows carriers to configure their systems to accommodate the lower level of capacity (actual), while only requiring that they be able to expeditiously expand to the upper limit (maximum) should the need arise.

Within this framework, the FBI sought and incorporated industry input at all stages of the rulemaking process. Initially, the FBI met with telecommunications carriers and associations, including the United States Telephone Association (USTA), the Electronic Communications Service Provider (ECSP) Committee, the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), the Cellular Telephone Industry Association (CTIA), the National Telephone Cooperative Association (NTCA) and the Personal Communications Industry Association (PCIA), in order to explain the CALEA capacity requirements and to solicit questions, comments, and opinions from the industry. Using industry input from these meetings, the FBI drafted the Initial Notice of Capacity. While the Initial Notice of Capacity was being developed, the FBI continued to meet with industry to discuss concepts and solicit industry consultation. During these stages, the FBI continued to meet with representatives of both wireline and wireless carriers. The FBI presented to the ECSP Committee the draft methodology of the Initial Notice of Capacity and an explanation of such concepts as the applicability of actual and maximum requirements to individual switches. In addition to carrier representatives, ECSP Committee membership included representatives of various associations, including CTIA, NECA, OPASTCO, PCIA and USTA. Again, the FBI solicited comments and issued an open invitation to meet with anyone who wished to further discuss the Initial Notice of Capacity. This same consultative procedure was followed during the development of the subsequent Second Notice of Capacity. Once the Second Notice of Capacity was published, the FBI met again with the ECSP committee, as well as with various individual carriers and associations both before and after its publication to provide supplemental explanations of the Second Notice of Capacity and to solicit comments and extend an invitation to discuss the notice further. The FBI maintained an ongoing dialogue with the telecommunications industry with regard to the Initial and Second Notices of Capacity through meetings and in response to comments.

In addition to industry input, the FBI solicited advice from a number of other government entities including the Department of Justice, the FCC, the OMB, and the SBA, as well as state and local law enforcement.[26]

The FBI recognizes that some small telecommunications carriers (small entities) offering service in certain geographic areas with significant intercept activity may be obligated to afford significant interception capacity. At the same time, the FBI also recognizes that the capacity requirements represent a critical means of safeguarding the public and, consequently, any exemption or relaxation from compliance would not be without cost. Therefore, to ensure that small entities are not unduly burdened, the FBI is developing a process whereby small entities may petition the Attorney General for reconsideration of their respective capacity requirements. The petition evaluation process will include consideration of a carrier's size, dynamics of the region in which the carrier operates, historical intercept activity, and law enforcement's electronic surveillance needs.

The FBI is also drafting a Small Business Compliance Guide (Guide) as required by SBREFA (5 U.S.C. Sections 801–808). The Guide will be provided to the SBA and various industry associations representing the interests of

[24] Comments of Cellular Mobile Systems of St. Cloud General Partnership, LLP, in response to the Second Notice of Capacity Requirements and Request for Comments; Feb. 13, 1997; Page 2.

[25] Cellular Mobile Systems of St. Cloud, Teleport Communications Group, NTCA, OPASTCO, PCIA, in response to the Second Notice of Capacity Requirements and Request for Comments; Feb. 13, 1997.

[26] The FBI had a continuous dialogue with members of federal, state, and local law enforcement between June 1995 and September 1997.

small entities. It will also be available upon request from the FBI. The Guide will identify an FBI small business liaison to assist small carriers with rule application.

In conclusion, the FBI believes this Final Notice of Capacity is fair and reasonable. The FBI remains committed to assisting small entities in attaining compliance. The FBI intends not only to maintain dialogue with industry representatives and the SBA's Office of Advocacy while developing the Small Business Compliance Guide, but also to ensure that small entities are provided the necessary information and assistance to attain compliance in the least burdensome and most cost effective manner possible.

III. Methodology for Projecting Capacity Requirements

A. Overview

The CALEA mandate set forth in section 104 obligates the Attorney General to estimate future interception capacity requirements and marks the first time that: (a) Information has been required to be provided to telecommunications carriers in order for them to design future networks with reference to the amount of potential future interception activity that may occur, and (b) the entire law enforcement community has been required to project its collective future potential needs for interception. This mandate has generated legitimate concern in the law enforcement community because telephone technology historically placed no constraints on the number of court-ordered interceptions that could be effected. If not implemented carefully, an under-scoping of capacity requirements under CALEA would have the unintended effect of restricting the technical ability to conduct interceptions authorized in court orders. If future interception needs are understated, law enforcement's investigative abilities will be hampered and, more importantly, public safety will be jeopardized.

Capacity notice provisions were included in CALEA to ensure that law enforcement's future interception needs in a geographic area would be articulated so that telecommunications carriers would be put on notice as to their obligations, in terms of how many interceptions they would need to be able to effect. These provisions also present a means for telecommunications carriers to better understand the nature and extent of their existing statutory obligations to accommodate law enforcement's interception needs. (Because law enforcement requirements for all types of interceptions are a function of authorized investigations, the estimated number that may be required in the future cannot be zero because that would imply that there is a county or market service area where an interception would not be conducted or would never be required. See Section G ''Establishing Threshold Capacity Requirements'' for further discussion on how minimum threshold interception capacities are estimated.) To establish capacity requirements that would meet law enforcement's future potential interception needs, law enforcement used a rigorous methodology. Objectives of the methodology used to establish capacity requirements are to ensure that future interception capacity requirements would (a) Be rationally grounded, and based on historical interception activity, (b) ensure that public safety is not compromised, (c) provide telecommunications carriers with a degree of certainty regarding law enforcement's potential interception needs over a reasonable period of time, (d) be based on well-recognized geographic areas affected, and (e) not dictate a solution to the industry.

The methodology consisted of these steps:

- Collecting information on historical interception activity
- Determining geographic areas for identifying capacity requirements
- Deriving a basis for determining capacity requirements for wireline carriers
- Deriving a basis for determining capacity requirements for wireless carriers
- Deriving growth factors for projecting future capacity requirements from historical information
- Establishing threshold capacity requirements.

B. Collecting Information on Historical Interception Activity

To comply with CALEA's mandate to project future capacity needs, law enforcement believed it was essential to first establish a historical baseline of interception activity from which future interception needs could be projected. This effort entailed a detailed review and analysis of the available information on recent federal, state, and local law enforcement interceptions throughout the United States. Such information had never before been collected in a single repository. Amassing this detailed and extremely sensitive information required an unprecedented and time-consuming effort. It involved identifying sources from which accurate information could be retrieved efficiently. The information required included the numbers of all types of interceptions (communications, pen register, and trap and trace) performed by federal, state, and local law enforcement agencies, in terms of the actual number of telephone lines intercepted at each locality. (For purposes of this notice, the word ''line'' refers to the transmission path from a subscriber's terminal to the network via a wireline or wireless medium.)

The Wiretap Report, published annually by the Administrative Office of the United States Courts, was a valuable source of historical information on criminal Title III (call content) court orders; however, it did not identify the actual number of interception lines associated with each court order or, more importantly, the vastly greater number of lines associated with call-identifying information interceptions (e.g., from pen registers and traps and traces) that have been performed by all law enforcement agencies. Even though law enforcement used information on the number of court orders reported in the Wiretap Report for forecasting purposes as described later in this section, the report did not contain the necessary line-related information needed to identify the level of past interceptions for establishing a historical baseline of activity.

To obtain line-related information regarding past simultaneous interceptions, records of interception activity were acquired from telecommunications carriers as well as law enforcement officials, and from the federal and state Clerks of Court offices (the official repositories for all interception court orders) through a survey. The objective of the survey effort was to determine the numbers of all types of interceptions (communications, pen register, and trap and trace) conducted between January 1, 1993, and March 1, 1995, for all geographic areas. Highly sensitive information pertaining to each interception was collected, including interception start/end dates and area code and exchange. The time period of January 1, 1993 to March 1, 1995 was chosen to obtain recent interception information that was reasonably retrievable given the time constraint imposed by CALEA with regard to publishing a Notice of Capacity.

Approximately 1,500 telecommunications carriers, representing nearly all wireline and cellular telephone companies (as of March 1995), were requested to provide information identifying where and how many interceptions had occurred within their networks during the survey period.

Records were submitted by approximately 66 percent of the telecommunications carriers surveyed. To ensure receipt of information from a comprehensive representation of the telecommunications industry, law enforcement worked closely with telecommunications carriers serving large markets or unique geographic areas. Such carriers included the Regional Bell Operating Companies (RBOC), GTE, and the largest providers of cellular service.

Sensitive interception records maintained under seal within the Clerks of Court offices were acquired through two separate efforts. Federal court order information was collected under special court orders directing the unsealing of this information for the limited purpose of issuing capacity notices required under section 104 of CALEA. State and local law enforcement records were collected with the assistance of the offices of the State Attorney Generals, District Attorneys, and state-wide prosecutors. This effort resulted in the collection of information on all federal law enforcement interception activity for the period surveyed and information on interceptions by state and local law enforcement from most states. (Some states' laws do not authorize the conduct of all types of interceptions, e.g., call content interceptions, and other states do not maintain retrievable records of all historical interception activity.)

C. Determining Geographic Areas for Identifying Capacity Requirements

Section 104(a)(2)(B) of CALEA requires law enforcement to identify, to the maximum extent practicable, the capacity needed at ''specific geographic locations.'' In addressing this mandate, law enforcement decided that using point-specific sites, such as switch locations, city blocks, or neighborhoods, would not be appropriate because it would not properly take into account movement in criminal activity and could lead to the compromise of sensitive investigations. Also, law enforcement believed that any geographic designation used should not be subject to frequent change, should relate to discernible and officially recognized geographic territorial boundaries, and should be commonly understood by the affected parties.

It was also considered essential that the geographic designations be ones that: (a) Historically have not been affected by regulatory changes in the telecommunications marketplace, (b) would allow flexibility for telecommunications carriers in developing solutions, and (c) would not be affected by changes in the configurations of telecommunications networks.

Law enforcement concluded that, for wireline carriers, county boundaries or their equivalent best met the criteria above and should be used to define the geographic locations for projecting future capacity requirements. (For purposes of this notice, the term ''county'' includes boroughs and parishes, as well as the District of Columbia and a few independent cities in Missouri, Maryland, Nevada, and Virginia that are not part of any county. U.S. territories such as American Samoa, Guam, the Mariana Islands, Puerto Rico, and the U.S. Virgin Islands are treated similarly.) Further, using the geographic designation of a county in this way was deemed appropriate because it is used by both telecommunications carriers and law enforcement. Telecommunications carriers pay county taxes and fees and are affected by county regulations. Likewise, law enforcement's legal territorial jurisdictions frequently are drawn based on county boundaries, and resources for law enforcement are often allocated on a county basis.

For wireless carriers, individual county boundaries were not considered to be a feasible geographic designation for identifying capacity requirements. Instead, law enforcement determined that wireless market service areas—Metropolitan Statistical Areas (MSA), Rural Statistical Areas (RSA), Major Trading Areas (MTA), and Basic Trading Areas (BTA)—would be more appropriate geographic designations. Although wireless market service areas comprise sets of counties, market service areas best take into account the greater inherent mobility of wireless subscribers. Furthermore, what is most important is that historical information on wireless interceptions could only be associated with market service areas.

The approach selected—using counties for wireline carriers and market service areas for wireless carriers—was also responsive to comments on the Initial Notice of Capacity urging that the two types of telecommunications carriers be treated separately; thus, different geographic designations should appropriately apply.

D. Deriving a Basis for Determining Capacity Requirements for Wireline Carriers

Having established the county as the appropriate geographic area for identifying capacity requirements for wireline carriers, law enforcement had to decide on a basis for determining capacity requirements for each county. Section 104(a)(2)(A) of CALEA stated that the capacity requirements could be based on type of equipment, type of service, number of subscribers, type or size of carrier, or nature of service area, but allowed the use of ''any other measure.'' Law enforcement chose to use the historical interception activity associated with telecommunications equipment located within a county as the most logical basis for making determinations about projected capacity requirements in a county.

Each wireline interception reported during the historical period surveyed (January 1, 1993, to March 1, 1995) was associated with a telecommunications switch, based on its area code and exchange (frequently referred to as its ''NPA/NXX code''), as found in the April 1995 version of the Local Exchange Routing Guide (LERG) published by Bellcore. The LERG contains information on the switching systems and exchanges of wireline carriers and is considered to be an authoritative source by the telecommunications industry. Thereafter, telecommunications switches were associated to counties by using the vertical and horizontal coordinates marking the switch's physical location.

CALEA also required that capacity requirements be expressed in terms of ''simultaneous'' interceptions. Law enforcement chose to consider interceptions occurring on the same day, rather than at exactly the same moment, as being simultaneous.[27] This time frame was logical from a law enforcement perspective, because interception court orders are authorized for a certain number of days as opposed to some other unit of time. Additionally, the time frame of one day was compatible with the historical data that was recorded only in days.

The daily interception activity of each switch in a county was examined, and the single day with the most interceptions during the period surveyed was used to identify the switch's highest number of simultaneous interceptions. Thereafter, the highest number of simultaneous interceptions identified for each switch in the county was totaled to produce a historical baseline for the county. Law enforcement believed that this approach provided a reasonable representation of

[27] Through the survey, the FBI was able to accurately discern the number of interceptions that were authorized simultaneously for any given day. As might well have been expected, it was impossible for the FBI to discern the number of interceptions that were effected simultaneously down to the hour, minute, or second.

past interception needs for the geographic area during the period surveyed. This approach also avoided the problems that would be inherent in trying to specify capacity requirements for interceptions on a site-specific or equipment-specific basis because of the fluid nature of interceptions conducted over time and because of changes in equipment and the services that the equipment supports. After determining the county's historical baseline, law enforcement sought to establish an appropriate means of utilizing that activity as a basis for projecting future capacity requirements. In the Initial Notice of Capacity, requirements were expressed as a percentage of the engineered capacity of equipment, facilities, and services. It was thought that in so doing, carriers would have more flexibility in addressing the capacity requirements. Comments on the Initial Notice of Capacity, however, questioned the meaning of engineered capacity and recommended that capacity requirements be expressed as fixed numbers rather than as percentages. In response, law enforcement re-examined this issue and found that using fixed numbers for each county would be a clearer way to express capacity requirements without tying them to constantly-changing components of telecommunications networks.

E. Deriving a Basis for Determining Capacity Requirements for Wireless Carriers

Having established the market service area as the appropriate geographic area for identifying future capacity requirements for wireless carriers, law enforcement had to decide on a basis for determining capacity requirements for each market service area. Each cellular interception reported during the period surveyed (January 1, 1993, to March 1, 1995) was associated with a cellular market service area using the August 1995 version of the Cibernet database, which contains information on roaming and billing arrangements for cellular networks and is considered to be an authoritative source by the telecommunications industry. Thereafter, the single day with the most interceptions during the period surveyed was identified and used as the historical baseline for each market service area.

Due to the similarities between cellular and PCS, law enforcement used the historical interception activity of cellular carriers to develop projections of future capacity requirements for PCS carriers. Cellular markets are defined by MSAs and RSAs, and PCS markets are defined by MTAs and BTAs. Historical cellular interception activity was mapped to a PCS market service area. Again, the single day with the most interceptions during the period surveyed was identified and used as the historical baseline for the market service area.

To be responsive to comments on the Initial Notice objecting to the use of percentages of engineered capacity, law enforcement found that using fixed numbers rather than percentages was also an appropriate means to express capacity requirements for wireless carriers.

F. Deriving Growth Factors for Projecting Future Capacity Requirements From Historical Information

Section 104 of CALEA requires the Attorney General to project future requirements for actual and maximum capacity. As discussed previously in this notice, law enforcement derived a baseline for these estimates from the historical interception activity in geographic areas defined as counties for wireline carriers and market service areas for wireless carriers during the period surveyed. To project future capacity requirements, growth factors were developed and applied to the historical information.

As noted, comments on the Initial Notice of Capacity recommended that capacity requirements be stated separately for wireline and wireless carriers. In response, law enforcement derived distinct growth factors for wireline and wireless carriers.

1. Formulas

As discussed below, four growth factors were used in this Final Notice of Capacity to project future capacity requirements: $A_{wireline}$, $A_{wireless}$, $M_{wireline}$, and $M_{wireless}$. The ''A'' factors were applied to historical interception activity to estimate future actual capacity requirements as of October 1998, and the ''M'' factors were used to estimate future maximum capacity requirements.

The formulas used for the projections were:

Wireline:

Future Actual Capacity Requirement in a County Equals The Historical Interception Activity in the County Multiplied by $A_{wireline}$

Future Maximum Capacity Requirement in a County Equals The Future Actual Capacity Requirement in the County Multiplied by $M_{wireline}$

Wireless:

Future Actual Capacity Requirement in a Market Service Area Equals The Historical Interception Activity in the Market Service Area Multiplied by $A_{wireless}$

Future Maximum Capacity Requirement in a Market Service Area Equals The Future Actual Capacity Requirement in the Market Service Area Multiplied by $M_{wireless}$

All of the resulting requirements for future actual and maximum capacity were rounded up to the next whole number.

2. Growth Factors

The growth factors used herein were derived solely from analysis related to the historical interception information. Three sources of historical information were deemed to provide relevant information to be considered as growth factors: (a) The number of court orders for call content interceptions which was obtained from the Wiretap Report published by the Administrative Office of United States Courts for the time period 1980 through 1995; (b) the number of court orders for call-identifying information from pen register and trap and trace interceptions, which was obtained from reports published by the Department of Justice (DOJ) documenting pen register and trap and trace usage by DOJ agencies for the time period 1987 through 1995; and (c) the historical baseline number of call content interceptions and interceptions of call-identifying information, which was obtained from the survey of law enforcement and industry for the time period January 1, 1993, through March 1, 1995.

To project the future numerical level of court orders, statistical and analytical methods were applied to the historical interception information. It should be understood that the projections for the number of potential future court orders do not mean that they are the numbers of orders that law enforcement will in fact obtain or intends to obtain. Rather, they are part of a statistical method used to derive growth factors that would be useful, ultimately, in calculating future actual and maximum capacity requirements.

A commonly-used analytical tool for projections, known as Best-Fit-Line analysis, was used to track the number of court orders over time and then to project the number into the future. Projections were made for call content court orders for wireline and wireless for the year 1998 and the year 2004. Projections were also made for the vastly greater number of pen register and trap and trace court orders for wireline and wireless for the year 1998 and the year 2004. Composite growth

figures for wireline interceptions and for wireless interceptions were then calculated by weighting the court order projections by the relative number of call content interceptions and interceptions of call-identifying information during the period surveyed. The resulting $A_{wireline}$ and $A_{wireless}$ growth factors were based on the 1998 projections. The $M_{wireline}$ and $M_{wireless}$ growth factors were based on the 2004 projections. The year 1998 was selected to comply with the statutory language of CALEA requiring law enforcement to estimate actual capacity requirements by that time. The year 2004 was selected because it provided a 10-year period after the passage of CALEA, a period that was considered reasonable for projecting maximum capacity requirements. It was also considered to be a rational period for constituting a stable capacity ceiling and a design guide.

The value derived for $A_{wireline}$ is 1.259; the value derived for $A_{wireless}$ is 1.707; the value derived for $M_{wireline}$ is 1.303; and the value derived for $M_{wireless}$ is 1.621. These growth factors can also be translated into, and understood in terms of, annual growth rates for capacity requirements. For wireline, if computed annually, growth rates are 5.92 percent for the period from 1994 through 1998, and 4.55 percent for the period from 1998 through 2004. For wireless, if computed annually, growth rates are 14.30 percent and 8.38 percent respectively, for the same time periods. Of relevance in determining the differences in growth rates are the expectations of overall business growth for wireline and wireless telephone services. Market projections for wireline show a steady growth rate of 3.5 percent annually, and wireless annual growth is projected to be 12.0 percent during each of the next 10 years.

For more information on how the growth factors were derived, refer to Appendix E which is available in the FBI's reading room.

G. Establishing Threshold Capacity Requirements

In its review of historical interception activity, law enforcement found that numerous counties and market service areas had no interception activity during the time period surveyed. Under the methodology described above, these counties and market service areas would have future actual and maximum capacity requirements equal to zero. However, the establishment of future capacity requirements of zero would not provide even a minimal level of interception capacity, nor would it address growth flexibility, and it would largely undermine the intent of CALEA, which is to preserve law enforcement's ability to conduct some level of interceptions everywhere. Additionally, it is possible that law enforcement may have conducted interceptions in these areas before or after the period surveyed, and it may well have to do so again. Experience has shown that criminal activity can occur anywhere. Therefore, law enforcement must be capable of conducting a number of interceptions in all areas. Consequently, *minimum threshold* baseline capacities were developed for counties and market service areas that otherwise would have had a capacity requirement of zero under the above methodology.

For wireline telephone service offered in counties, law enforcement examined the distribution of historical interception activity and found that many counties had no interceptions, and many others had only one interception during the time period surveyed. To avoid having counties with no future capacity requirements, law enforcement decided to treat counties with zero historical interceptions as if they had one interception. Hence, when the growth factors for counties were applied, it produced a future actual capacity requirement of two simultaneous interceptions and a future maximum capacity requirement of three simultaneous interceptions.

For wireless market service areas, law enforcement took a similar approach. Here, too, it found that many market service areas had no interceptions during the time period surveyed. Law enforcement chose to treat these market service areas as if they had one interception. Hence, when the growth factors for wireless carriers were applied to these market service areas, the result was a future actual capacity requirement of two simultaneous interceptions and a future maximum capacity requirement of four simultaneous interceptions.

IV. Alternative Analysis

Consideration was given to potentially effective and feasible alternatives to this rule. However, as discussed in this Alternative Analysis section, Law enforcement determined that alternatives were not viable in that they either (1) Would impose undue burdens by not allowing companies the flexibility to use the efficiencies of their networks to efficiently meet the requirements; (2) would potentially impose unfair burdens to companies with specific types of equipment; (3) would not meet the needs of law enforcement; or, (4) would not take into consideration the differences between the wireline and wireless market.

A. Alternative Approaches Considered in Determining Capacity Requirements

Law enforcement considered and rejected a number of alternatives while developing this rule. Initially, law enforcement considered whether a new regulation was actually necessary. That a notice was required was obvious from the mandate of CALEA Section 104, which directs the Attorney General on behalf of all law enforcement entities to publish notice of the actual and maximum capacity requirements that telecommunications carriers may be required to effect in support of lawfully authorized electronic surveillance. Law enforcement could identify no other existing regulations which might provide viable alternatives. Ultimately, law enforcement determined that it was necessary to develop new regulations which were both industry and CALEA specific. This rule is the result of that development effort.

B. Alternative Promulgated in Initial Notice of Capacity

In accordance with CALEA 104(a)(2), the Government examined many different alternatives of expressing the capacity requirements. The alternatives included basing the requirements upon the type of equipment, type of service, number of subscribers, type of carrier, and nature of service area. In fulfilling the mandated role described above, law enforcement examined a number of alternative approaches in expressing the capacity required at specific geographic locations. On October 16, 1995, law enforcement's proposed future actual and maximum capacity requirements were presented in an Initial Notice of Capacity published in the **Federal Register** (60FR53643). Comments on the Initial Notice were accepted through January 16, 1996.

In the Initial Notice of Capacity the actual and maximum capacity requirements were presented as a percentage of the engineered capacity of the equipment, facilities, and services that provide a customer or subscriber with the ability to originate, terminate, or direct communications. Engineered capacity referred to the maximum number of subscribers that could be served by that equipment, facility, or service. The percentage were to apply to both the engineered subscriber capacity of a switch and to non-switch equipment (i.e., network peripherals) involved in the origination, termination, or direction of communications. Percentages were used rather than fixed numbers due to the dynamics and

diversity of the telecommunications industry. The use of percentages was expected to allow telecommunications carriers the flexibility to adjust to changes in marketplace conditions or changes in the number of subscribers, access lines, equipment, facilities, etc., and still know the required level of capacity. The percentages were then applied to three categories, based upon geography and historical intercept activities.

As a result of extensive consultation with Federal, State, and local law enforcement agencies, telecommunications carriers, providers of telecommunications support services, and manufacturers of telecommunications equipment, the FBI proposed the following capacity requirements: each telecommunications carrier would have needed the ability to meet the capability assistance requirements defined in section 103 of the CALEA for a number of simultaneous pen register, trap and trace, and communication interceptions equal to the percentage of the engineered capacity of the equipment, facilities, or services that provide a customer or subscriber with the ability to originate, terminate, or direct communications.

Each telecommunications carrier would have needed to ensure that it could expeditiously increase its capacity to meet the assistance capability requirements defined in section 103 of the CALEA for a number of simultaneous pen register, trap and trace, and communication interceptions equal to the percentage of the engineered capacity of the equipment, facilities, or services that provide a customer or subscriber with the ability to originate, terminate, or direct communications. When translated from percentages to numbers, capacity requirements would have been rounded up to the nearest whole number.

As noted above, the telecommunications industry generally expressed the view that this approach was less useful than expressing capacity requirements with fixed numbers. Consequently, this approach was abandoned in favor of an approach based upon the use of fixed numbers.

C. Alternative Methods of Expressing Capacity Requirements

Following the release of the Initial Notice of Capacity, law enforcement consulted with telecommunications industry representatives, privacy advocates, and other interested parties to receive feedback on the method used to express future actual and maximum capacity requirements. This consultative process assisted law enforcement in understanding the challenges facing the industry and others in applying the capacity requirements as expressed in the Initial Notice of Capacity. Law enforcement refined its approach of defining capacity requirements and issued a Second Notice of Capacity, published in the **Federal Register** on January 14, 1997 (62FR1902) to more fully articulate estimated actual and maximum capacity requirements. Comments on the Second Notice of Capacity were accepted through March 15, 1997.

The objective of both the Initial and Second Notice of Capacity was to ensure that law enforcement's future capacity requirements would (a) be rationally grounded, and based on historical interception activity, (b) ensure that public safety is not compromised, (c) provide both wireline and wireless telecommunications carriers with a degree of certainty regarding law enforcement's needs over a reasonable period of time, (d) be based on the geographic areas affected, and (e) not dictate a specific solution to the industry.

Section 104 of CALEA mandates that the Attorney General publish a Notice of Capacity estimating the capacity requirements that law enforcement may need to conduct electronic surveillance in the future. The FBI examined several different methods and formulas to determine the best way to calculate the requirements to be imposed on the telecommunications industry. The first method, which was used in the Initial Notice of Capacity, was to express the actual and maximum capacity requirements as a percentage of the engineered capacity of the equipment, facilities, and services that provide a customer or subscriber with the ability to originate, terminate, or direct communications. This methodology is described in detail in the Initial Notice of Capacity.[28] The industry considered percentages an imprecise guideline, the term ''engineered capacity'' confusing, and that fixed numbers would be a better representation of how capacity requirements should represented.

Capacity Requirement on a Switch Specific Basis

Law enforcement assessed the industry comment of expressing future capacity on a switch or equipment specific basis and determined that capacity requirements would need to be met regardless of the type, size, or configuration of switching equipment deployed in any given geographic area.

Comments received to the Second Notice of Capacity indicated that without a more specific delineation of the capacity requirements, carriers would be placed in the position of applying the capacity requirements to all the equipment in a geographic area. However, law enforcement determined that there was no certain correlation between specific equipment and a geographic location where future interception capacity may be required.

One alternative considered was publishing the capacity requirements on an individual switch basis. With the rapid pace at which the telecommunications industry network advances and changes, identification of any specific equipment in the Notice of Capacity would run the risk of being invalid at the time the Notice of Capacity is effective. Moreover, any new equipment installed after the publication date of the Notice of Capacity would not be identified and present an unnecessary level of ambiguity to all new equipment.

Equipment supporting the wireline network can be identified within the Local Exchange Routing Guide (LERG). All local exchange switches servicing the network are listed with their respective vertical and horizontal coordinates, and the area codes and exchanges that they serve. No equivalent source of information exists for the wireless network. Therefore, expressing wireless capacity requirements could not be accomplished at a similar geographic level as in the wireline network.

A second alternative considered was the assessment of all simultaneous intercept activity in a given county, regardless of the amount and location of equipment within the county. This analysis would result in the determination of the day with the highest number of interceptions when all interceptions reported within the county were considered. The application of the requirements would be as though the electronic surveillance needs of the entire county was served by a single switch. This value would always be less than or equal to the sum of all the switch simultaneities within the county and would not allow for the very real possibility that switch simultaneities could occur concurrently in the future. For the majority of the counties there was no significant difference between the sum of switch simultaneities and county simultaneity (i.e., 2454 of the 3146 would retain the same county requirement as published in the Second Notice of Capacity).

[28] Initial Notice of Capacity, published 10/16/95 60FR53643.

However, those counties with significant capacity requirements would be subject to the largest numeric change in the value of historic surveillance experience and hence placed under the greatest risk of underestimating the capacity requirement.

This alternative results in significant implementation difficulty for meeting capacity needs because any individual switch activity would not be taken into account. In fact, this approach dilutes the magnitude of historic interception activity. This method of consideration would, over time, understate the needs of law enforcement.

Furthermore, the promulgation of capacity requirements on a switch specific basis presupposes a solution and does not allow any flexibility to carriers as networks evolve. Switch specific capacity requirements were determined to be an unsatisfactory method of expressing capacity requirements due to the dynamics and diversity of the telecommunications industry.

Further, requirements on a switch specific basis would be untenable due to the potential for future changes in switch sizes and the areas they serve. Switch specific capacity requirements would be fundamentally flawed since they would inappropriately ''freeze'' future interception capacity based upon past switch activity. Some reasonable flexibility must be employed. The use of geographic areas is expected to allow telecommunications carriers the flexibility to adjust to changes in marketplace conditions or changes in the number of subscribers, access lines, equipment, facilities, etc.

Single Largest Switch Intercept Value Within a Geographic Area

A third alternative considered was the application of capacity based on the single largest switch intercept value in a county to all switches located in that county. This approach would result in an excess of capacity required to be deployed in the network and hence have significant cost implications. Additionally, there would be little or no law enforcement justification for applying the single largest switch historical interception value to switches within the county with minimal electronic surveillance experience.

Average Intercept Activity Value

A fourth alternative considered was the establishment of capacity based on an average intercept activity value for all switches in a county and the application of this value to each switch in that county. This alternative would result in an understatement of capacity needs for the county because switches with significant historic electronic surveillance in some geographic areas would not have an adequate capacity requirement. The number of switches within a given county can increase or decrease the average intercept activity for the entire county, thereby possibly dangerously understating capacity requirements in a high intercept area.

Total Intercepts Regardless of Simultaneity

A fifth alternative considered was to express total capacity requirements of a geographic area based on the total number of intercepts conducted in that geographic area during the observed time period, regardless of the simultaneity. A large number of interceptions does not universally translate into a large simultaneity value for a given county or switch. The total number of intercepts conducted in a geographic area is not truly representative of law enforcement requirements. Furthermore, this could not be considered as a viable alternative for computing capacity as it does not meet CALEA's simultaneity requirement as expressed in Section 104(a).

Average Intercept Length

Another alternative would have been to base, in part, the capacity requirements on the average intercept length for the county. While this information may act as an indicator of interception activity in the county, it would not necessarily be a reflection of a given switch. If the average length of the interceptions is significant it would be an indication that the simultaneity is a less peaked or random event. However, county numbers may still be too nondescript in a small number of counties to be transcribed to individual switches as requirements in those instances where the county is very large geographically, or contains a large number of individual switches.

Size of Carrier

An analysis of the telecommunications industry reveals that no association exists between the location of criminal activity and the size of a carrier that provides service in that geographic area. The analysis of the historic electronic surveillance activity was based on the geographic location and the occurrence of each surveillance reported. No direct relationship can be drawn from the available data between the capacity requirements and the size of the carrier, whether that carrier is measured by the number of lines with which it provides service, the geographic area in which it provides service or any other measure of size.

Expressing Individual Carrier Capacity Requirements

Establishment of capacity requirements for individual carriers cannot be accurately characterized as a geographic method of expressing capacity requirements as mandated by CALEA. As the existing incumbent carrier community reacts to increased competition as a result of the Telecommunications Act of 1996, service territories will undoubtedly change. Establishing capacity requirements on a carrier-specific basis also leaves the deployment of capacity up to the interpretation of that carrier. In the case of a carrier with a very large service area, law enforcement needs in a particular geographic area may not be satisfied. The possibility of a carrier not having sufficient capacity of equipment, facilities and services in a given geographic area would be a real threat to the public safety. Furthermore, law enforcement was unable to establish a correlation between where interceptions may be needed and individual carriers such as to support accurate future electronic surveillance estimations.

Service or Feature-Specific Capacity Requirements

Expressing capacity based on services or features would be unworkable and would fail to provide law enforcement with the coverage and capability necessary to effect electronic surveillance wherever it may be needed. Not all services or features are supported in all geographic areas. With new services and features constantly under development and deployment, expressing capacity requirements on a service or feature basis would create an environment that is subject to frequent change both as to territories and networks. Further, since criminal activity is mobile in nature, service or feature-specific capacity requirements would not be conducive to meeting law enforcement requirements.

V. Statement of Capacity Requirements

Section 104 of CALEA mandates that law enforcement capacity requirements be expressed on a geographical basis, to the maximum extent practicable, and be published in the **Federal Register** after government notice and after industry and public comment. In fulfillment of this mandate, law enforcement, for the first time in history, conducted an unprecedented survey of historical electronic surveillance activity including all line related pen register, trap and trace and communications

interceptions for the period January 1, 1993 through March 1, 1995. The analysis of this collected information was used to form a baseline from which future interception activity was projected using well recognized statistical tools and methods.

The issuance of this Notice of Capacity represents fulfillment of the statutory mandate to provide notice for estimated future actual and maximum capacity requirements. Taking the unpredictable nature of crime into account, law enforcement has made every attempt to provide reasonable and prudent numbers in specific geographic areas, to the maximum extent practicable, based upon hard historical interception data.

The capacity requirements as stated in this Final Notice of Capacity are requirements of a geographic nature and do not presuppose a specific technical solution or deployment strategy of the industry or of an individual carrier. The capacity requirements are expressed as to specific geographical areas to the maximum extent practicable and hence satisfy the obligation placed upon law enforcement by CALEA. Law enforcement, in the fulfillment of its CALEA obligations, has expressed the capacity requirements after careful consideration of the comments to the Initial Notice of Capacity and Second Notice of Capacity.

The methodology used in the formulation of these estimated future capacity requirements represents interception capacity that may be required within various geographic areas.

Both the county and market service area capacity requirements are based on historic interception activity with future capacity projections based on growth factor analyses which draw upon past levels of lawfully authorized interception orders.

The capacity requirements are being expressed in a solution neutral manner. Switch specific delineation of capacity requirements would be contrary to the letter and spirit of CALEA. Furthermore, promulgation of capacity requirements on a switch-specific basis presupposes a solution and does not allow any flexibility for the industry and would be dated to time-specific configurations.

The dynamic nature of telecommunications technology, and of the telecommunications industry itself, does not lend itself to the delineation of capacity requirements of a more granular nature. Law enforcement, in the publication of estimated future capacity requirements, projected capacity requirements that would be applicable regardless of individual carrier network deployment strategies.

Additionally, law enforcement can not articulate capacity requirements in any greater detailed fashion without endangering the public safety and risking exposure of law enforcement sensitive information. The dynamic nature of criminal activity precludes law enforcement from publishing capacity requirements at such a detailed level that would aid the criminal element in determining where law enforcement is focusing its interception efforts.

Capacity requirements as published in this Final Notice of Capacity represent law enforcement's future estimated actual and maximum interception needs in each geographic area. Carriers are encouraged to propose solutions that adequately meet law enforcement needs within a given geographic area. A carrier's specific network configuration may afford the carrier opportunities to propose unique solutions by which it can meet law enforcement requirements.

The obligation to satisfy the capacity requirements in a cost-effective and reasonable manner is the responsibility of all carriers that operate within a given geographic area. Although law enforcement can not dictate how carriers should apply the capacity requirements, law enforcement is providing guidance to the industry as to the distribution of capacity requirements within a particular geographic area.

A. Capacity Requirements for Wireline Carriers

Law enforcement is providing notice of the estimated number of future communication interceptions, pen register and trap and trace device-based interceptions that may be conducted simultaneously in a given geographic area. Counties have been selected as the appropriate geographic basis for expressing interception capacity requirements for telecommunications carriers offering local exchange service (i.e., wireline carriers). Appendix A lists all actual and maximum estimates by county. (Appendix A is available in the FBI's reading room for review). These numbers represent estimates of potential future simultaneous call content interceptions and interceptions of call-identifying information for each county in the United States and its territories. Wireline carriers may ascertain the actual and maximum capacity estimates that will affect them by looking up in Appendix A the county (or counties) for which they offer local exchange service. These future capacity requirement estimates will remain in effect for all telecommunications carriers providing wireline service to these areas until such time, if any, as the Attorney General publishes a notice of any necessary increase in the maximum capacity pursuant to section 104(c) of CALEA.

County capacity requirements represent the estimated future number of all types of interceptions that may be conducted simultaneously anywhere within the county. When effective, the county capacity requirements apply to all existing and any future wireline carriers offering local exchange service in each county, regardless of the type of equipment used or the customer base. Individual carriers configure their networks differently, and as a result, law enforcement recognizes that carriers may pursue different solutions for meeting the capacity requirements.

B. Capacity Requirements for Wireless Carriers

Law enforcement is providing notice of the estimated number of future communication interceptions, pen register and trap and trace device-based interceptions that may be conducted simultaneously in a given geographic area and has selected market service areas—MSAs, RSAs, MTAs, and BTAs—as the appropriate geographic basis for expressing actual and maximum interception capacity requirements for telecommunications carriers offering wireless services, specifically those providing cellular and PCS services (i.e., wireless carriers). Appendix B lists all actual and maximum capacity estimates for MSAs and RSAs; Appendix C lists all actual and maximum capacity estimates for MTAs; and Appendix D lists all the actual and maximum estimates for BTAs. (Appendixes B, C, and D are available in the FBI's reading room for review). These numbers represent estimates of potential future simultaneous call content interceptions and interceptions of call-identifying information for each market service area. These future capacity requirement estimates will remain in effect for all wireless carriers providing service to these areas until such time, if any, as the Attorney General publishes a notice of any necessary increases in maximum capacity pursuant to section 104(c) of CALEA.

In all cases, the statement of interception capacity for a wireless market service area reflects law enforcement's estimated future number of interceptions that may be conducted simultaneously anywhere in the service area. Law enforcement must be capable of conducting interceptions at any time, regardless of the location of a subject's

mobile telephone device within the service area. Once effective, the market service area capacity requirements apply to all existing and any future telecommunications carrier offering wireless service in each market. Individual carriers configure their networks differently, and as a result, law enforcement recognizes that carriers may pursue different solutions for meeting the capacity requirements.

In response to comments submitted to the Second Notice of Capacity and in order to offer some flexibility for PCS carriers, law enforcement has chosen to amend the treatment of capacity as to the geographic areas for PCS carriers serving Major Trading Areas (MTAs) and Basic Trading Areas (BTAs). Because each PCS market capacity requirement is based on the historic activity of its respective and composite cellular markets, every PCS license holder will have the following options: (1) Provide for the equivalent total capacity of the composite cellular markets served (MSAs and RSAs, as delineated in Appendix B), or (2) provide the PCS requirements for MTAs and BTAs as delineated in Appendix C and D.

The first option is responsive to the concerns of PCS carriers in that it allows for PCS capacity requirements to more closely match the cellular historical activity from which both the cellular and PCS requirements were derived. This option addresses geographically large PCS license areas that have capacity requirements driven by a small number of their composite cellular markets. This option is available to PCS license holders provided that their systems and services can be shown to serve only a portion of the MTA or BTA that can be described with reference to one or more composite cellular markets. As a PCS service provider expands to offer service throughout a PCS license area, the PCS carrier would be responsible for the cumulative total of the capacity requirements of the composite cellular markets.

The second option allows a PCS carrier, serving an entire license area (composed of its respective and composite cellular markets), to meet law enforcement capacity requirements everywhere throughout the market area. The simultaneity of all historic interceptions occurring within the geographic area now served by a PCS market is the only way for law enforcement to represent its estimated actual and maximum capacity requirements. Therefore, this second option can be used by those PCS carriers providing telecommunications services throughout the market area.

C. Capacity Application

With reference to the matter of applying interception capacity so as to accommodate the estimated actual and maximum future capacity numbers specified for the various geographical areas set forth for wireline and wireless carriers in this Final Notice of Capacity, distribution of interception capacity will be addressed either pursuant to CALEA Section 104(d) and (e) or otherwise.

1. Although law enforcement cannot, under CALEA, dictate solutions, it is law enforcement's position, consistent with CALEA, that carriers should consider solutions and approaches for accommodating the published capacity requirements in a way that maximizes cost-effectiveness.

2. Each carrier's deployment strategy must ensure that, if needed, the estimated actual and maximum capacity requirements set forth for the applicable geographic areas can be met. Two points require emphasis: (1) The capacity numbers set forth are for a geographic area and are not switch-specific requirements, and (2) no carrier will be expected to provide capacity in excess of the geographically-based capacity numbers set forth in this Final Notice of Capacity. Until such time, if any, that law enforcement seeks modification of the maximum capacity numbers in any geographic area through the publication of a new capacity notice, no carrier will be expected to provide capacity in excess of the maximum capacity specified for that area.

3. Switches serving multiple geographic areas will need to address the potential cumulative requirement specified for those geographic areas.

4. Law enforcement believes that the industry will develop several solutions for meeting the geographically-based capacity requirements as stated in this Final Notice of Capacity. In the event that a carrier elects to deploy a switch-based solution, it should consider the following information:

Nominal Levels of Capacity

Under this Final Notice of Capacity, carriers will find that the overwhelming majority of the geographic areas delineated in the Notice have estimated capacity requirements that are quite nominal.

The nominal character of the capacity requirements for the 3,146 counties delineated in Appendix A can be summarized by the following statistics. Over 66 percent of all counties (2,089) have an actual capacity requirement of two and a maximum capacity requirement of three simultaneous interceptions. As described earlier in this Final Notice of Capacity, these thresholds were based on a county historic experience of one interception. Approximately 90 percent of all counties (2,807) have an actual capacity requirement of twelve or less and a maximum capacity requirement of sixteen simultaneous interceptions or less.

The nominal character of the capacity requirements for the 734 cellular market service areas delineated in Appendix B can be summarized by the following statistics. Approximately 70 percent of all markets (510) have an actual capacity requirement of two and a maximum capacity requirement of four simultaneous interceptions. As described earlier in this Final Notice of Capacity, this threshold was based on a market service area historic experience of one interception. Over 83 percent of all cellular market service areas (614) have an actual capacity requirement of twelve or less and a maximum capacity requirement of twenty simultaneous interceptions or less.

Wireline High-End Switch Capacity

In order to offer capacity guidance to those carriers that are offering service in the relatively small number of counties where the estimated actual and maximum capacity numbers may be somewhat sizeable, (e.g., 17 out of the 3,146 counties have maximum capacity requirements of 235 or more) and who choose to pursue a switch-based solution, law enforcement is providing a high-end capacity ceiling that it would expect from any one switch. The interception data collected during the two year survey period indicates that there is a discernable difference in the interception requirements that law enforcement would need depending upon the type of surveillance conducted. The data indicates that the highest level of historic call-identifying information-based interceptions experienced by any one switch was 235, while the highest level of historic call content-based interceptions experienced by any one switch was 45. Applying the previously described wireline growth factors, the data suggests that a maximum of 386 call-identifying information-based interceptions and a maximum of 75 call content-based interceptions may occur on a switch. This information has led law enforcement to decide that it will not require any wireline carrier to effect more than 386 simultaneous call-identifying information-based interceptions or more than 75 call content-based interceptions from any one switch, regardless of the actual and

maximum capacity requirements of the counties served by that switch.

Wireless High-End Switch Capacity

In order to offer capacity guidance to those carriers that are offering service in the relatively small number of market service areas where the estimated actual and maximum capacity numbers may be somewhat sizeable, (e.g., 30 out of the 734 cellular market service areas have maximum capacity requirements of 58 or more) and who choose to pursue a switch-based solution, law enforcement is providing a high-end capacity ceiling that it would expect from any one switch. The interception data collected during the two year survey period indicates that there is a discernable difference in the interception requirements that law enforcement would need depending upon the type of surveillance conducted. The data indicates that the highest level of historic call-identifying information-based interceptions experienced by any one carrier in a given market was 58, while the highest level of historic call content-based interceptions experienced by any one carrier in a given market was 41. Applying the previously described wireless growth factors, the data suggests that a maximum of 163 call-identifying information-based interceptions and a maximum of 114 call content-based interceptions may occur in a market for which a carrier would be responsible. This information has led law enforcement to decide that it will not require any wireless carrier to effect more than 163 simultaneous call-identifying information-based interceptions or more than 114 call content-based interceptions from any one switch in a market, regardless of the actual and maximum capacity requirements of the market service areas served by that switch. This guidance can be used by any wireless carrier covered by this Final Notice of Capacity.

With reference to the matter of applying interception capacity to accommodate the actual and maximum future capacity numbers specified for the various geographical areas set forth for wireline and wireless carriers in this Final Notice of Capacity in those instances that are *not* covered by CALEA Section 104(d) and (e), (where carriers are obligated to meet the interception capacity requirements without reimbursement) the following information is offered:

1. The interception capacity requirement within each wireline or wireless geographic area can be applied and capacity distributed at the discretion of each carrier.

Carriers are in the best position to make judgments about how they will be best able to meet the capacity requirement obligation within each geographic area based upon the solutions they choose to use in each area. Solutions that a carrier may choose to deploy could include centralized, network-based solutions or switch-based solutions, combinations of these, or other solutions that may be developed within the telecommunications industry.

2. From a law enforcement perspective, the fundamental concern is that interception capacity must be available as needed. Hence, as long as carriers can accommodate the interception capacity required when needed, the capacity could be addressed and applied as either reserved or deployed.

D. Delivery of Capacity Requirements

Comments from interested parties have requested greater clarity in law enforcement's definition of an interception for the purpose of applying law enforcement's capacity requirements to ensure a CALEA-compliant solution. Interested parties have also commented requesting clarification as to the matter of ''delivery'' as delivery would relate to law enforcement's estimated capacity requirement per interception. In order to provide such additional clarification, the following illustrative examples are being furnished. They are not intended as an exhaustive list of options for the industry to pursue. As different solutions are developed by the industry, the delivery of law enforcement's estimated capacity requirements may change accordingly.

For pen register and trap and trace device-based interceptions, where only call-identifying dialing and signaling information is collected by the carrier and delivered to law enforcement, it is anticipated that one delivery channel per interception will suffice for the delivery of such information to law enforcement. This figure presupposes, and is based on, a solution where a carrier will ''extract'' any and all dialed digits and related signaling from a subject's voice channel necessary to fully complete a call and provide such information on a single delivery channel. Another solution may require two delivery channels per interception to law enforcement if such dialed digits and related signaling are not extracted from a subject's voice channel by a carrier. Furthermore, a carrier may choose to consolidate the delivery of many pen register and trap and trace device-based interceptions onto a single delivery channel. The specific solution chosen by a carrier will therefore dictate the number of delivery channels necessary to accommodate pen register and trap and trace device-based interceptions.

In the case of communications content interceptions, the number of delivery channels required will be dependent on the specific services and features made available by a carrier in any given geographic area. Law enforcement further believes that the industry will develop and deploy additional services and features in the future which will also impact the delivery of communications content interceptions to law enforcement. Any solution developed and deployed by the industry would need to accommodate those additional services and features.

The following examples are intended to further clarify the delivery of law enforcement's estimated capacity requirements, based on the information currently available to law enforcement, should a carrier choose to effect a switch-based CALEA-compliant solution. The following examples do not advocate or discourage the selection and deployment of any particular solution.

For the majority of counties, (2,089 of 3,146, or 66.4 percent) where the estimated wireline actual capacity requirement is two and the estimated maximum capacity requirement is three, the delivery of intercepted call-identifying information to law enforcement may take on any of the following forms. In the event that all of the interceptions are call-identifying information interceptions, the smallest number of delivery channels necessary would be one. This would be the case when a carrier extracts post cut-through dialed digits and related signaling and consolidates all of this information onto a single delivery channel and all of the information is intended for a single law enforcement agency.

The largest possible number of delivery channels required per interception for these 2,089 counties occur under circumstances where every interception was a communications content-based interception and the subject of the interception employs advanced features and services. If each such subject subscribes to and simultaneously makes use of three advanced features, a carrier may need to make available up to five delivery channels to law enforcement. These advanced features, being supported by such subjects' service, include but are not limited to call waiting, an incoming call forwarded to voice-mail, and a conference call. The delivery of all of the potential intercepted

communications content and call-identifying information associated with these features could necessitate up to 15 delivery channels for the entire county for the simultaneous delivery to law enforcement of all of the potential communications and related call-identifying information supported by the subjects' service.

An additional 820 (26.1 percent) counties have estimated wireline maximum capacity requirements of 25 or less. In the case where all 25 interceptions are call-identifying information-based interceptions, a carrier may be required to provide 50 channels for the delivery of dialed digits and related signaling information. This number would decrease where the carrier extracts post cut-through dialed digits and signaling and consolidates the information on a single delivery channel. The largest possible number of delivery channels a carrier may be required to provide would be where all 25 interceptions were communications content-based and the subject of each interception utilizes a number of advanced features. As in the previous example, if each subject subscribes to and simultaneously makes use of three advanced features, a carrier may need to make up to five delivery channels available to law enforcement. In this example, if every subject within the county subscribes to and employs these services simultaneously, there would be a need for up to 125 delivery channels to be made simultaneously available to law enforcement.

The above two examples have application to 2,909 of the 3,146 (92.5 percent) counties covered by this Final Notice of Capacity. For those relatively few counties where the estimated capacity requirements of a county exceed the maximum levels set forth above for a switch-based solution, the number of delivery channels required would be contingent upon the type of interception and the specific solution chosen by a carrier. The 386 maximum simultaneous interceptions described earlier can include as many as 75 communications content interceptions. Using the previous example, this would result in 311 (386 less 75) channels necessary for the delivery of pen register and trap and trace device interceptions (this would be the case when a carrier extracts post cut-through dialed digits and related signaling and consolidates this information onto a single delivery channel per intercept) and up to five channels for each of the communications content interceptions. The total number of channels would therefore be 686 ($5 \times 75 = 375 + 311 = 686$). This number would be greatly reduced if the information for the 311 pen register and trap and trace device interceptions were to be further consolidated.

For the majority of wireless markets (510 of 734 cellular markets, or 69.5 percent), where the estimated wireless actual capacity requirement is two and the estimated wireless maximum capacity requirement is four, the delivery of intercepted call-identifying information to law enforcement may take on any of the following forms. In the event that all of the interceptions are call-identifying information interceptions, the smallest number of delivery channels necessary would be one. This would be the case when a carrier extracts post cut-through dialed digits and related signaling and consolidates all of this information onto a single delivery channel and all of the information is intended for a single law enforcement agency.

The largest possible number of delivery channels required per interception for these 510 cellular markets would occur under the circumstances where every interception was a communications content-based interception and the subject of the interception employs advanced features and services. If each such subject subscribes to and simultaneously makes use of three advances features, a carrier may need to make available up to five delivery channels to law enforcement. If every subject within the market subscribes to and employs these services simultaneously, there would be a need for up to 20 delivery channels to be made simultaneously available to law enforcement.

An additional 114 (15.5 percent) cellular markets have estimated capacity wireless maximum requirements of 25 or less. In the case where all 25 interceptions are call-identifying information-based interceptions, a carrier may be required to provide 50 channels for the delivery of dialed digit and signaling information. This number would decrease where the carrier extracts post cut-through dialed digits and signaling and consolidates the information on a single delivery channel. The largest possible number of delivery channels a carrier may be required to provide would be in the case where all 25 interceptions were communications content-based and the subject of each interception utilizes advanced features. As in the previous example, if each subject subscribes to and simultaneously makes use of three advanced features, a carrier may need to make up to five delivery channels available to law enforcement. In this example, if every subject within the county subscribes to and employs these services simultaneously, there would be a need for up to 125 delivery channels to be made simultaneously available to law enforcement.

The above two examples have application to 624 of the 734 (85.0 percent) cellular markets covered by this Final Notice of Capacity. For those relatively few markets where the estimated capacity requirements of a market exceed the maximum levels set forth above for a switch-based solution, the number of delivery channels required would be contingent upon the type of interception and the specific solution chosen by a carrier. The 163 maximum simultaneous interceptions described earlier can include as many as 114 communications content interceptions. Using the previous example, this would result in 49 (163 less 114) channels necessary for the delivery of pen register and trap and trace device interceptions (this would be the case when a carrier extracts post cut-through dialed digits and related signaling and consolidates this information onto a single delivery channel per intercept) and up to five channels for each of the communications content interceptions. The total number of channels would therefore be 619 ($114 \times 5 = 570 + 49 = 619$). This number would be reduced if the information for the 49 pen register and trap and trace device interceptions were to be further consolidated.

VI. Related Issues

A. Carrier Statement

Section 104(d) of CALEA requires that within 180 days of this Final Notice of Capacity, a telecommunications carrier shall submit a statement identifying any of its systems or services that do not have the capacity to accommodate simultaneously the number of call content interceptions and interceptions of call-identifying information set forth in this Final Notice of Capacity. Resellers of telecommunication service need not report on systems or services subject to the reporting requirements of another carrier. The information in the Carrier Statement will be used, in conjunction with law enforcement priorities and other factors, to determine the telecommunications carriers that may be reimbursed in accordance with CALEA section 104(e).

A Telecommunications Carrier Statement Template has been developed with the assistance of the telecommunications industry to facilitate submission of the Carrier Statement. Use of the template is not mandatory, but law enforcement

encourages industry to use the template when identifying any of its systems or services that do not have the capacity to accommodate simultaneously the number of call content interceptions, pen registers, and trap and trace interceptions set forth in this Final Notice of Capacity.

The information to be solicited will include the following: Common Language Location Identifier (CLLI) code or equivalent identifier, switch model or other system or service type, and the city and state where the system or service is located. Unique information required for wireline systems and services will include the host CLLI code if the system or service is a remote, and the county or counties served by the system or service. Unique information required for wireless systems and services will include the MSA or RSA market service area number(s), or the MTA or BTA market trading area number(s) served by the system or service.

The confidentiality of the data received from the telecommunications carriers will be protected by the appropriate statute, regulation, or non-disclosure agreements.

After reviewing the Carrier Statements, the Attorney General may, subject to the availability of appropriations, agree to reimburse a carrier for costs directly associated with modifications to attain capacity requirements in accordance with the final rules on cost recovery. Decisions to enter into cost reimbursement agreements will be based on law enforcement prioritization factors.

On April 10, 1996, the Carrier Statement Notice was published in the **Federal Register** for comment under the Paperwork Reduction Act of 1995 (PRA) (61 FR 15974). A sixty-day comment period ensued ending on June 10, 1996. After reviewing the comments received, the Second Carrier Statement Notice was published in the **Federal Register** on April 24, 1997 (62 FR 20032). It was published a second time on May 6, 1997 (62 FR 24662) to correct the issuing agency. Comments were accepted on the Second Carrier Statement Notice through June 6, 1997. In accordance with the PRA of 1995, public comment has twice been solicited on the reporting and record keeping requirements of the Telecommunications Carrier Statement. These reporting and record keeping requirements have been assigned an Office of Management and Budget (OMB) Control Number 1110–0024, which expires on November 30, 2000.

B. Cost Recovery Rules

CALEA authorizes the appropriation of $500 million for reimbursing telecommunications carriers for certain reasonable costs directly associated with achieving CALEA compliance. Section 109(e) directs the Attorney General to establish regulations, after notice and comment, for determining such reasonable costs and establishing the procedures whereby telecommunications carriers may seek reimbursement. In accordance with the section 109 (e) mandate, the final rule was published in the **Federal Register**, 62 FR 13307, on March 20, 1997.

As authorized by section 109, and upon execution of a cooperative agreement, a telecommunications carrier may be reimbursed for the following: (1) All reasonable plant costs directly associated with the modifications performed by the carrier in connection with equipment, facilities, and services installed or deployed on or before January 1, 1995, in order to comply with section 103; (2) additional reasonable plant costs directly associated with making the requirements in section 103 reasonably achievable with respect to equipment, facilities, or services installed or deployed after January 1, 1995; and (3) reasonable plant costs directly associated with modifications of any telecommunications carrier's systems or services, as identified in the Carrier Statement, that do not have the capacity to accommodate simultaneously the number of call content interceptions and interceptions of call-identifying information set forth in this Final Notice of Capacity.

VII. The Second Notice of Capacity

A. Statement of Capacity Requirements in the Second Notice

The Second Notice of Capacity identified the number of simultaneous interceptions that telecommunications carriers should be able to accommodate in a given geographical area as of the date that is 3 years after the date of this Final Notice of Capacity and thereafter.

The Initial Notice of Capacity, being law enforcement's first expression of estimated future interception capacity on a national scale and for all agencies, was viewed by the industry as too ambiguous to adequately convey capacity requirements. The comments to the Initial Notice of Capacity led to a significant change in the methodology used in developing the capacity requirements, as well as to the expression of those requirements on a geographically specific basis. Each of those comments was reviewed and analyzed, and ultimately resulted in the new approach reflected in the Second Notice of Capacity. As discussed later, some comments to the Second Notice of Capacity suggested changes that, if adopted, would have produced a Final Notice of Capacity similar to the Initial Notice of Capacity.

B. Discussion of Comments on the Second Notice of Capacity

On January 14, 1997, law enforcement's estimates for future actual and maximum capacity were presented in the Second Notice of Capacity. The Second Notice of Capacity was published in the **Federal Register** as mandated by section 104 of CALEA. Comments on the Second Notice of Capacity were accepted through March 17, 1997. Twenty-nine parties consisting of individuals, privacy advocates, telecommunications companies and industry associations submitted comments. The substantive comments are set forth in the following fourteen points.

1. The Capacity Requirements Are Not Representative of the Historical Electronic Surveillance Information Supplied by the Industry

Seventeen comments (AirTouch Communications, Ameritech, AT&T Wireless, Bell Atlantic NYNEX Mobile, Bell Atlantic, BellSouth, Cellular Mobile Systems of St. Cloud, Cellular Telecommunications Industry Association, Center for Democracy and Technology and the Center for National Security Studies, GTE, Harrisonville Telephone Co., MCI, Pacific Telesis Group, Personal Communications Industry Association, SBC Communications, United States Telephone Association, US West) were received on the Second Notice of Capacity stating that the capacity requirements were too high. Twelve of these comments indicated that the numbers were too high and should not be applied to every carrier, nor should the numbers be applied to every switch within a geographic area. Two of these comments stated that the Government failed to estimate its capacity needs in a ''cost-conscious manner''. Two of the comments specifically indicated that the wireless numbers were too high. One comment suggested that the information used in calculating the capacity requirements be audited by the industry in an effort to validate the requirements.

In response to the foregoing comments, law enforcement responds by stating that the future estimated capacity requirements were projected by applying statistical and analytical methods to the historical interception information collected during the survey

of law enforcement and the telecommunications industry. It should be understood that the projections for the number of potential future interceptions do not mean that they are the numbers of interceptions that law enforcement will in fact effect or intends to effect.

An option considered by law enforcement was to use only industry-provided numbers in calculating capacity requirements. However, there exist areas within the country for which neither industry nor law enforcement data was available. Therefore, the inconsistency in reporting between the industry and law enforcement did not allow for the sole reliance on or use of either set of data. Law enforcement believes, based upon a review of the industry's reporting, that using only information from the industry would have resulted in an underestimation of law enforcement interception capacity requirements in certain areas of the country.

2. The Definition of Expeditious Is Not Realistic for the Expansion From Actual Capacity to Maximum Capacity

Seven comments (AirTouch Communications, Bell Atlantic, Organization for the Promotion and Advancement of Small Telecommunications Companies, Pacific Telesis Group, Personal Communications Industry Association, SBC Communications, Telecommunications Industry Association) were received from the telecommunications industry stating that five business days would not be sufficient to allow a carrier to make the necessary equipment changes or additions to expand its interception capacity from the actual to the maximum capacity.

In order to assure that law enforcement will be able to effect timely interceptions, carriers must be able to expeditiously expand to the maximum capacity within five days. However, law enforcement intends to give as much advance notice and flexibility as possible in fulfilling this requirement.

Further, increasing capacity to meet the maximum requirement under most circumstances should not pose any significant technological hurdle for a service provider because the difference between actual and maximum capacities is very small for most geographic areas. Law enforcement also recognizes that in those instances where the difference between actual and maximum capacity would be sizeable, the increase in capacity requested by law enforcement from actual to maximum capacity would most likely be incremental in nature and solution dependent. Because the solution(s) to be employed is(are) currently not known, law enforcement cannot reasonably predict exact incremental increases in capacity. However, experience has shown that the telecommunications industry has the technical means to respond promptly, and law enforcement has no reason to believe that the industry will not continue to cooperate or be able to respond as needed in this regard.

3. The Second Notice of Capacity Inappropriately Uses a Day as the Base Unit for Calculating Simultaneity

Four comments (Center for Democracy and Technology and the Center for National Security Studies, Pacific Telesis Group, United States Telephone Association, US West) were received indicating that the Second Notice of Capacity inappropriately uses a day as the base unit for calculating simultaneity. One of the comments suggested using traditional industry factors such as traffic engineering ''busy hour'', to determine capacity requirements for individual switches.

The derivation of simultaneity was based on the information available to law enforcement. The records compiled by law enforcement, as described in this Final Notice of Capacity, pertaining to the historic interception activity is only available based upon, and can only be analyzed for, individual days. The use of traffic engineering may be appropriate in traditional telephony but is impossible to apply to surveillance data. Criminal usage patterns, which are not available, would need to be collected and analyzed for these parameters to use traffic engineering principles. Furthermore, law enforcement used a ''day'' as the base unit for calculating simultaneity because court orders are authorized for a certain number of days as opposed to any other measure of time, and because no more detailed information exists.

4. Request for Switch Specific Requirements

Twelve comments (AirTouch Communications, Bell Atlantic NYNEX Mobile, Bell Atlantic, BellSouth, Cellular Telecommunications Industry Association, Center for Democracy and Technology and the Center for National Security Studies, GTE, Personal Communications Industry Association, SBC Communications, Telecommunications Industry Association, United States Telephone Association, US West) were received requesting switch-specific capacity requirements. Several of the comments suggested that the Government should break the data down on a switch-specific level.

As described in Section IV.C. above, this alternative was considered, but promulgation of capacity requirements on a switch specific basis presupposes a solution, does not allow any flexibility to carriers as networks evolve, and would be less useful to both industry and law enforcement. Nonetheless, after consideration of these comments, law enforcement decided to offer information and guidance on how a carrier may choose to apply the capacity requirements in any given geographic area if the carrier chooses to deploy a switch-based solution (See Section V.C.). That choice will be at the discretion of the carrier. Under those circumstances, if a carrier chooses to deploy a switch-based solution, the capacity requirement can initially be distributed at the discretion of the carrier with the understanding that the estimated actual capacity requirements of the area need to be met.

5. Request for Specific Breakdown of Communications Content, Pen Register, and Trap and Trace Interception Orders

Nine comments (AirTouch Communications, Bell Atlantic NYNEX Mobile, Bell Atlantic, BellSouth, Cellular Telecommunications Industry Association, Personal Communications Industry Association, SBC Communications, Telecommunications Industry Association, United States Telephone Association) were received stating that the capacity requirements should be delineated according to the type of interception (i.e., pen register, trap and trace, and communications content).

The average national ratio of communications content interceptions to pen register and trap and trace interceptions is not necessarily in any way representative of any specific geographic region, nor is it representative of any specific switching entity. The past ratio of pen registers and traps and traces to full communication content interception was derived from national averages of all interceptions conducted during the 26-month survey period. The Government believes that it would be inappropriate to use any such ratio in all localities as a basis for developing a solution to meet the capacity requirements in a particular area. Any solution developed by the industry must account for the significant variance in the distribution of the types of interceptions. The variance for historical switch-specific data is from zero percent communications content interceptions up to 100 percent

communications content interceptions from area to area. Several examples exist where the application of the nationwide ratio would clearly hamper law enforcement efforts to conduct electronic surveillance and protect public safety.

Further, law enforcement has concluded that because it does not know the type(s) of surveillance that will be needed in the future, it cannot provide the industry with a specific breakdown of such surveillances by county or market service area based upon past interception activity. Also, owing to the various technical solutions and approaches that carriers are considering for certain capabilities, such as the potential extraction and delivery of post cut-through dialed digits and signaling, law enforcement cannot accurately articulate a specific breakdown of surveillances by type. In the event that a carrier elects to use a solution that is switch-based, the Government has taken steps to quantify the maximum level of pen register and call content interceptions that would be expected from any one switch in terms of a ''high end capacity ceiling'' (see Section V.C.).

6. Request for Specific Number of Call Content Channels (CCC) and Call Data Channel (CDC)

Four comments (AT&T Wireless, SBC Communications, Telecommunications Industry Association, United States Telephone Association) were received requesting that capacity requirements be specified as numbers of CCCs and CDCs.

Law enforcement does not currently know what approaches carriers will employ as solutions to meet CALEA requirements. The suggestion that the required number of CCCs and CDCs should be defined separately presupposes a solution where carriers isolate and deliver all call-identifying information over a CDC, including post cut through digits dialed and related signaling. It would be inappropriate for law enforcement to presuppose any particular solution. Further, the interim industry standard (J–STD–025) does not support the extraction of dual-tone multi-frequency (DTMF) signals, and as such, may lead to very different solutions from those that the comments presuppose.

7. Apportionment of Capacity Requirements Amongst Carriers Serving a Particular Geographical Area

Thirteen comments (AirTouch Communications, AT&T Wireless, Bell Atlantic NYNEX Mobile, BellSouth, Cellular Telecommunications Industry Association, Center for Democracy and Technology and the Center for National Security Studies, National Telephone Cooperative Association, Organization for the Promotion and Advancement of Small Telecommunications Companies, Pacific Telesis Group, Personal Communications Industry Association, SBC Communications, Telecommunications Industry Association, Teleport Communications Group) were received stating that capacity requirements should be specified for each carrier serving a particular geographical area based upon each carrier's market share.

An apportionment of capacity amongst carriers cannot reasonably be made based on ever-changing market factors and market shares that law enforcement can only guess at. The inherent instability and constant market share movements within the telecommunications market makes apportionment impossible on a ''percentage of the market'' basis. Furthermore, the historical data does not show any correlation between market share and electronic surveillance activity. For example, in a number of instances where there are multiple services providers in a geographic area, one service provider has accounted for the majority of historic intercepts. However, as discussed above, in a number of instances, an individual carrier can distribute the capacity requirements at its discretion as long as the requirements (as stated in the appendixes to this Final Notice of Capacity) for an entire geographical area are met. Furthermore, if a carrier chooses to deploy a switch-based solution, Section V.C. of this Final Notice of Capacity delineates the maximum simultaneous interceptions that would be expected from any one switch.

8. Capacity Requirements Will Serve as a Barrier to New Entrants in the Market

Six comments (AT&T, AT&T Wireless, Cellular Telecommunications Industry Association, MCI, Telecommunications Industry Association, Teleport Communications Group) were received indicating that the capacity requirements will serve as a barrier to new entrants into the market. One comment suggested that the Government should issue a third notice for new entrants.

Law enforcement realizes that a new entrant in a county or market service area can initially expect to capture only a very small portion of the subscriber base. Also, as stated in the previous response and elsewhere above, an individual carrier, based on its unique network configuration, can distribute the capacity requirements at its discretion with the understanding that the capacity requirements as stated in the appendixes to this Final Notice of Capacity represent law enforcement's estimated actual and maximum capacity requirements for an entire geographical area. Furthermore, if a carrier chooses to deploy a switch-based solution, Section V.C. of this Final Notice of Capacity delineates the maximum simultaneous interceptions that would be expected from any one switch.

9. The Data Used in Deriving the Capacity Requirements Should Be Audited

One comment (Telecommunications Industry Association) was received stating that the data collected during the survey period for the purposes of deriving capacity requirements should be audited.

Law enforcement considered the comment requesting the audit of data used in the calculation of the capacity requirements and concluded that the detailed electronic surveillance information for the entire United States is of a sensitive nature, and should not be disclosed. However, the FBI is prepared to let an individual carrier examine the subset of information pertaining to that carrier's network and historic interception activity. Law enforcement has previously provided carriers with the opportunity to examine such data by which the capacity requirements for their networks were determined.

10. The Methodology Used for the Extrapolation of PCS Capacity Requirements Is Not Appropriate Nor Representative of Law Enforcement Needs

Two comments (BellSouth, Personal Communications Industry Association) were received indicating that the Second Notice of Capacity's method of determining capacity requirements for PCS was incorrect and does not represent law enforcement's needs.

The decision to publish PCS capacity requirements on a market basis was driven by the fact that each individual PCS license holder could serve the entire market at its discretion. With no historical PCS interception activity, as mentioned previously in this Final Notice of Capacity, and the fact that each PCS market is composed of whole or partial cellular markets from which capacity requirements can be reasonably derived, law enforcement believes that market-based requirements offer the most reasonable and supportable means of fulfilling law enforcement's CALEA mandate to publish capacity

requirements on a geographical basis for all carriers.

After consideration of the comments from the PCS industry and in order to offer some flexibility for PCS carriers, law enforcement has chosen to amend the geographical areas that can be used for the PCS capacity requirements for those PCS carriers serving Major Trading Areas (MTA) and Basic Trading Areas (BTA). Every PCS license holder will have the option of supporting either the equivalent total capacity requirements of the composite cellular markets (MSAs & RSAs as delineated in Appendix B) in which the license holder can provide service or the PCS requirements for MTAs and BTAs as delineated in Appendixes C and D, respectively. This approach is responsive to PCS carriers' concern about PCS markets not accurately reflecting historical surveillance activity, and it allows a PCS carrier to increase its capacity as it expands into new service areas.

11. Any Negotiation Between Law Enforcement and a Carrier Regarding the Capacity Requirements in One or More Geographical Areas Should Be Made Part of the Public Record

Two comments (Ameritech, Personal Communications Industry Association) were received stating that any negotiation between the Government and carriers regarding capacity requirements should be made available to the public.

The Final Notice of Capacity defines the estimated actual and maximum capacity requirements on a geographical basis for wireline and wireless (cellular and PCS) carriers. Law enforcement will not alter these actual or maximum capacity requirements with any carrier. Law enforcement has met its statutory requirement by making public the number of interceptions it estimates it may need to conduct in specified geographic areas in the future. The capacity requirements reflect the total number of communications content, pen register, and trap and trace interceptions that law enforcement estimates it may need to conduct. Furthermore, law enforcement has suggested information and guidance for the application of the requirements to the industry within this Final Notice of Capacity.

12. Growth Factor Derivation is Inappropriate and Not At All Reflective of Overall Crime Trends

Four comments (AT&T Wireless, BellSouth, Telecommunications Industry Association, United States Telephone Association) were received stating that the growth factor derivation was inappropriate and not reflective of overall crime trends. One comment suggested using zero or negative growth rates.

Overall crime trends are not necessarily indicative of, or directly related to, electronic surveillance needs. While certain types of crime may be decreasing, the record for electronic surveillance orders, as shown by the *Wiretap Reports* and the DOJ reports on the use of pen registers and trap and traces, indicates that over time federal, state, and local investigations have required and increased use of electronic surveillance. It must be stated that law enforcement agencies and prosecutorial offices (as well as the courts) have relied on the use of electronic surveillance where required notwithstanding overall crime trends. Also, the maximum capacity requirements are not representative of the number of interceptions that law enforcement expects to perform on a regular basis, but rather a capacity ceiling to be used by the industry in the development of technical solutions.

13. The Methodology Used in the Formulation of Capacity Requirements Is Inappropriate

Nine comments (Ameritech, AT&T Wireless, Bell Atlantic NYNEX Mobile, BellSouth, Center for Democracy and Technology and the Center for National Security Studies, GTE, SBC Communications, Telecommunications Industry Association, United States Telephone Association) were received questioning the methodology used for determining capacity requirements.

As discussed in Section IV.C., alternative methods of expressing capacity requirements were considered. The methodology used to determine future capacity requirements projects the potential interception needs of law enforcement in geographic areas to the maximum extent practicable. Both the wireline county and the wireless market service area requirements were based on historic interception activity and used growth factors derived from past interception trends as well as commonly-used statistical tools in the issuance of lawfully authorized surveillance orders.

14. The Final Notice of Capacity Should Express Capacity Requirements in Terms of Engineered Capacity

One comment (Cellular Telecommunications Industry Association) requested that the capacity requirements be expressed in terms of ''engineered capacity''.

In the Initial Notice of Capacity, requirements were expressed as a percentage of the engineered capacity of equipment, facilities, and services. It was thought that in so doing, carriers would have more flexibility in addressing the capacity requirements. Comments submitted on the Initial Notice of Capacity, however, questioned the meaning of engineered capacity and recommended that capacity requirements be expressed as fixed numbers rather than as percentages. In response, law enforcement re-examined this issue and found that using fixed numbers for each county and market service area would be a clearer way to express capacity requirements without tying them to constantly-changing components of telecommunications networks.

After consideration of the aforementioned comments, law enforcement decided to offer information and guidance on ways that a carrier may choose to apply the capacity requirements in any given geographic area (See Section V.C.).

Dated: March 3, 1998.

Louis Freeh,

Director, Federal Bureau of Investigation, Department of Justice.

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Alabama	Autauga	3	4	2
Alabama	Baldwin	3	4	2
Alabama	Barbour	2	3	1
Alabama	Bibb	2	3	0
Alabama	Blount	2	3	0
Alabama	Bullock	2	3	0
Alabama	Butler	2	3	0
Alabama	Calhoun	11	15	8
Alabama	Chambers	18	24	14
Alabama	Cherokee	2	3	1
Alabama	Chilton	2	3	0
Alabama	Choctaw	2	3	0
Alabama	Clarke	2	3	1
Alabama	Clay	2	3	0
Alabama	Cleburne	2	3	0
Alabama	Coffee	2	3	0
Alabama	Colbert	6	8	4
Alabama	Conecuh	2	3	1
Alabama	Coosa	2	3	0
Alabama	Covington	2	3	0
Alabama	Crenshaw	2	3	0
Alabama	Cullman	2	3	0
Alabama	Dale	2	3	0
Alabama	Dallas	8	11	6
Alabama	DeKalb	3	4	2
Alabama	Elmore	3	4	2
Alabama	Escambia	2	3	1
Alabama	Etowah	4	6	3
Alabama	Fayette	2	3	0
Alabama	Franklin	2	3	1
Alabama	Geneva	2	3	0
Alabama	Greene	2	3	0
Alabama	Hale	2	3	0
Alabama	Henry	2	3	0
Alabama	Houston	6	8	4
Alabama	Jackson	8	11	6
Alabama	Jefferson	77	101	61
Alabama	Lamar	2	3	0
Alabama	Lauderdale	6	8	4
Alabama	Lawrence	2	3	0
Alabama	Lee	2	3	0
Alabama	Limestone	4	6	3
Alabama	Lowndes	2	3	0
Alabama	Macon	2	3	0
Alabama	Madison	63	83	50
Alabama	Marengo	9	12	7
Alabama	Marion	2	3	0
Alabama	Marshall	2	3	1
Alabama	Mobile	62	81	49
Alabama	Monroe	2	3	1
Alabama	Montgomery	24	32	19
Alabama	Morgan	9	12	7
Alabama	Perry	2	3	0
Alabama	Pickens	2	3	0
Alabama	Pike	7	10	5
Alabama	Randolph	2	3	0
Alabama	Russell	2	3	0
Alabama	Shelby	2	3	0
Alabama	St. Clair	12	16	9
Alabama	Sumter	2	3	0
Alabama	Talladega	6	8	4
Alabama	Tallapoosa	8	11	6
Alabama	Tuscaloosa	12	16	9

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Alabama	Walker	2	3	0
Alabama	Washington	2	3	0
Alabama	Wilcox	6	8	4
Alabama	Winston	2	3	0
Alaska	Aleutians East	14	19	11
Alaska	Aleutians West	6	8	4
Alaska	Anchorage	57	75	45
Alaska	Bethel	3	4	2
Alaska	Bristol Bay	2	3	0
Alaska	Denali	2	3	0
Alaska	Dillingham	2	3	0
Alaska	Fairbanks North Star	2	3	1
Alaska	Haines	2	3	0
Alaska	Juneau	9	12	7
Alaska	Kenai Peninsula	2	3	0
Alaska	Ketchikan Gateway	47	62	37
Alaska	Kodiak Island	2	3	0
Alaska	Lake and Peninsula	2	3	1
Alaska	Matanuska-Susitna	6	8	4
Alaska	Nome	2	3	0
Alaska	North Slope	6	8	4
Alaska	Northwest Arctic	2	3	0
Alaska	Prince of Wales-Ketchikan	2	3	0
Alaska	Sitka	2	3	1
Alaska	Skagway-Hoonah-Angoon	2	3	0
Alaska	Southeast Fairbanks	2	3	0
Alaska	Valdez-Cordova	2	3	0
Alaska	Wade Hampton	2	3	0
Alaska	Wrangell-Petersburg	2	3	0
Alaska	Yakutat	2	3	0
Alaska	Yukon-Koyukuk	7	10	5
American Samoa	American Samoa	2	3	0
Arizona	Apache	2	3	0
Arizona	Cochise	37	49	29
Arizona	Coconino	6	8	4
Arizona	Gila	2	3	0
Arizona	Graham	2	3	0
Arizona	Greenlee	2	3	0
Arizona	La Paz	2	3	0
Arizona	Maricopa	502	655	398
Arizona	Mohave	21	28	16
Arizona	Navajo	2	3	1
Arizona	Pima	148	193	117
Arizona	Pinal	14	19	11
Arizona	Santa Cruz	14	19	11
Arizona	Yavapai	17	23	13
Arizona	Yuma	41	54	32
Arkansas	Arkansas	2	3	0
Arkansas	Ashley	2	3	1
Arkansas	Baxter	2	3	0
Arkansas	Benton	3	4	2
Arkansas	Boone	2	3	0
Arkansas	Bradley	2	3	0
Arkansas	Calhoun	2	3	0
Arkansas	Carroll	2	3	0
Arkansas	Chicot	2	3	0
Arkansas	Clark	3	4	2
Arkansas	Clay	2	3	1
Arkansas	Cleburne	2	3	0
Arkansas	Cleveland	2	3	0
Arkansas	Columbia	2	3	0
Arkansas	Conway	2	3	1
Arkansas	Craighead	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Arkansas	Crawford	2	3	0
Arkansas	Crittenden	2	3	0
Arkansas	Cross	2	3	0
Arkansas	Dallas	2	3	0
Arkansas	Desha	2	3	0
Arkansas	Drew	2	3	0
Arkansas	Faulkner	2	3	1
Arkansas	Franklin	2	3	0
Arkansas	Fulton	2	3	0
Arkansas	Garland	21	28	16
Arkansas	Grant	2	3	0
Arkansas	Greene	2	3	0
Arkansas	Hempstead	2	3	0
Arkansas	Hot Spring	2	3	0
Arkansas	Howard	2	3	0
Arkansas	Independence	2	3	0
Arkansas	Izard	2	3	0
Arkansas	Jackson	2	3	0
Arkansas	Jefferson	11	15	8
Arkansas	Johnson	2	3	0
Arkansas	Lafayette	2	3	0
Arkansas	Lawrence	2	3	0
Arkansas	Lee	2	3	0
Arkansas	Lincoln	2	3	0
Arkansas	Little River	2	3	0
Arkansas	Logan	2	3	0
Arkansas	Lonoke	2	3	0
Arkansas	Madison	2	3	0
Arkansas	Marion	2	3	0
Arkansas	Miller	2	3	0
Arkansas	Mississippi	13	17	10
Arkansas	Monroe	2	3	0
Arkansas	Montgomery	2	3	0
Arkansas	Nevada	2	3	0
Arkansas	Newton	2	3	0
Arkansas	Ouachita	2	3	0
Arkansas	Perry	2	3	0
Arkansas	Phillips	2	3	0
Arkansas	Pike	2	3	0
Arkansas	Poinsett	2	3	0
Arkansas	Polk	2	3	0
Arkansas	Pope	2	3	0
Arkansas	Prairie	2	3	0
Arkansas	Pulaski	22	29	17
Arkansas	Randolph	2	3	0
Arkansas	Saline	6	8	4
Arkansas	Scott	2	3	0
Arkansas	Searcy	2	3	0
Arkansas	Sebastian	3	4	2
Arkansas	Sevier	2	3	0
Arkansas	Sharp	2	3	0
Arkansas	St. Francis	2	3	0
Arkansas	Stone	2	3	0
Arkansas	Union	2	3	0
Arkansas	Van Buren	2	3	0
Arkansas	Washington	6	8	4
Arkansas	White	3	4	2
Arkansas	Woodruff	2	3	0
Arkansas	Yell	2	3	0
California	Alameda	142	186	112
California	Alpine	2	3	0
California	Amador	14	19	11
California	Butte	8	11	6

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
California	Calaveras	3	4	2
California	Colusa	2	3	0
California	Contra Costa	72	94	57
California	Del Norte	4	6	3
California	El Dorado	11	15	8
California	Fresno	52	68	41
California	Glenn	2	3	1
California	Humboldt	8	11	6
California	Imperial	29	38	23
California	Inyo	2	3	0
California	Kern	42	55	33
California	Kings	2	3	1
California	Lake	4	6	3
California	Lassen	2	3	0
California	Los Angeles	1360	1773	1080
California	Madera	17	23	13
California	Marin	56	73	44
California	Mariposa	4	6	3
California	Mendocino	7	10	5
California	Merced	12	16	9
California	Modoc	2	3	0
California	Mono	2	3	0
California	Monterey	27	36	21
California	Napa	13	17	10
California	Nevada	13	17	10
California	Orange	147	192	116
California	Placer	16	21	12
California	Plumas	2	3	0
California	Riverside	86	113	68
California	Sacramento	110	144	87
California	San Benito	2	3	1
California	San Bernardino	52	68	41
California	San Diego	332	433	263
California	San Francisco	96	126	76
California	San Joaquin	33	43	26
California	San Luis Obispo	16	21	12
California	San Mateo	65	85	51
California	Santa Barbara	18	24	14
California	Santa Clara	143	187	113
California	Santa Cruz	16	21	12
California	Shasta	14	19	11
California	Sierra	2	3	0
California	Siskiyou	7	10	5
California	Solano	32	42	25
California	Sonoma	72	94	57
California	Stanislaus	24	32	19
California	Sutter	11	15	8
California	Tehama	4	6	3
California	Trinity	2	3	0
California	Tulare	18	24	14
California	Tuolumne	2	3	0
California	Ventura	29	38	23
California	Yolo	13	17	10
California	Yuba	2	3	0
Colorado	Adams	32	42	25
Colorado	Alamosa	2	3	0
Colorado	Arapahoe	79	103	62
Colorado	Archuleta	3	4	2
Colorado	Baca	2	3	0
Colorado	Bent	2	3	0
Colorado	Boulder	19	25	15
Colorado	Chaffee	2	3	1
Colorado	Cheyenne	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Colorado	Clear Creek	2	3	0
Colorado	Conejos	2	3	0
Colorado	Costilla	12	16	9
Colorado	Crowley	4	6	3
Colorado	Custer	2	3	0
Colorado	Delta	3	4	2
Colorado	Denver	148	193	117
Colorado	Dolores	2	3	0
Colorado	Douglas	8	11	6
Colorado	Eagle	4	6	3
Colorado	El Paso	32	42	25
Colorado	Elbert	2	3	1
Colorado	Fremont	2	3	1
Colorado	Garfield	9	12	7
Colorado	Gilpin	2	3	0
Colorado	Grand	2	3	0
Colorado	Gunnison	4	6	3
Colorado	Hinsdale	2	3	0
Colorado	Huerfano	2	3	0
Colorado	Jackson	2	3	0
Colorado	Jefferson	42	55	33
Colorado	Kiowa	3	4	2
Colorado	Kit Carson	2	3	0
Colorado	La Plata	3	4	2
Colorado	Lake	2	3	0
Colorado	Larimer	40	53	31
Colorado	Las Animas	2	3	0
Colorado	Lincoln	2	3	0
Colorado	Logan	2	3	0
Colorado	Mesa	8	11	6
Colorado	Mineral	2	3	0
Colorado	Moffat	2	3	0
Colorado	Montezuma	2	3	0
Colorado	Montrose	3	4	2
Colorado	Morgan	2	3	0
Colorado	Otero	3	4	2
Colorado	Ouray	2	3	1
Colorado	Park	2	3	0
Colorado	Phillips	2	3	0
Colorado	Pitkin	6	8	4
Colorado	Prowers	2	3	0
Colorado	Pueblo	2	3	1
Colorado	Rio Blanco	2	3	0
Colorado	Rio Grande	2	3	0
Colorado	Routt	2	3	0
Colorado	Saguache	2	3	0
Colorado	San Juan	2	3	0
Colorado	San Miguel	8	11	6
Colorado	Sedgwick	2	3	0
Colorado	Summit	8	11	6
Colorado	Teller	2	3	0
Colorado	Washington	2	3	0
Colorado	Weld	11	15	8
Colorado	Yuma	2	3	1
Connecticut	Fairfield	76	100	60
Connecticut	Hartford	66	86	52
Connecticut	Litchfield	16	21	12
Connecticut	Middlesex	7	10	5
Connecticut	New Haven	77	101	61
Connecticut	New London	22	29	17
Connecticut	Tolland	2	3	0
Connecticut	Windham	3	4	2 z
Delaware	Kent	11	15	8

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Delaware	New Castle	29	38	23
Delaware	Sussex	6	8	4
District of Columbia	District of Columbia	216	282	171
Florida	Alachua	7	10	5
Florida	Baker	3	4	2
Florida	Bay	8	11	6
Florida	Bradford	2	3	1
Florida	Brevard	56	73	44
Florida	Broward	222	290	176
Florida	Calhoun	2	3	0
Florida	Charlotte	3	4	2
Florida	Citrus	2	3	0
Florida	Clay	3	4	2
Florida	Collier	13	17	10
Florida	Columbia	2	3	0
Florida	Dade	570	743	452
Florida	DeSoto	3	4	2
Florida	Dixie	2	3	0
Florida	Duval	61	80	48
Florida	Escambia	27	36	21
Florida	Flagler	2	3	0
Florida	Franklin	2	3	0
Florida	Gadsden	2	3	0
Florida	Gilchrist	2	3	0
Florida	Glades	2	3	0
Florida	Gulf	2	3	0
Florida	Hamilton	2	3	0
Florida	Hardee	2	3	1
Florida	Hendry	2	3	0
Florida	Hernando	13	17	10
Florida	Highlands	6	8	4
Florida	Hillsborough	148	193	117
Florida	Holmes	3	4	2
Florida	Indian River	6	8	4
Florida	Jackson	6	8	4
Florida	Jefferson	2	3	0
Florida	Lafayette	2	3	0
Florida	Lake	18	24	14
Florida	Lee	46	60	36
Florida	Leon	6	8	4
Florida	Levy	2	3	0
Florida	Liberty	2	3	0
Florida	Madison	2	3	1
Florida	Manatee	31	41	24
Florida	Marion	18	24	14
Florida	Martin	4	6	3
Florida	Monroe	22	29	17
Florida	Nassau	2	3	0
Florida	Okaloosa	11	15	8
Florida	Okeechobee	2	3	1
Florida	Orange	46	60	36
Florida	Osceola	11	15	8
Florida	Palm Beach	97	127	77
Florida	Pasco	21	28	16
Florida	Pinellas	121	158	96
Florida	Polk	31	41	24
Florida	Putnam	11	15	8
Florida	Santa Rosa	8	11	6
Florida	Sarasota	37	49	29
Florida	Seminole	16	21	12
Florida	St. Johns	4	6	3
Florida	St. Lucie	8	11	6
Florida	Sumter	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Florida	Suwannee	2	3	0
Florida	Taylor	2	3	1
Florida	Union	2	3	0
Florida	Volusia	21	28	16
Florida	Wakulla	2	3	0
Florida	Walton	3	4	2
Florida	Washington	3	4	2
Georgia	Appling	3	4	2
Georgia	Atkinson	2	3	0
Georgia	Bacon	2	3	0
Georgia	Baker	2	3	0
Georgia	Baldwin	3	4	2
Georgia	Banks	2	3	0
Georgia	Barrow	2	3	0
Georgia	Bartow	4	6	3
Georgia	Ben Hill	2	3	0
Georgia	Berrien	2	3	0
Georgia	Bibb	17	23	13
Georgia	Bleckley	2	3	0
Georgia	Brantley	11	15	8
Georgia	Brooks	6	8	4
Georgia	Bryan	17	23	13
Georgia	Bulloch	104	136	82
Georgia	Burke	2	3	1
Georgia	Butts	2	3	1
Georgia	Calhoun	2	3	0
Georgia	Camden	36	47	28
Georgia	Candler	2	3	1
Georgia	Carroll	2	3	1
Georgia	Catoosa	2	3	1
Georgia	Charlton	2	3	0
Georgia	Chatham	16	21	12
Georgia	Chattahoochee	2	3	0
Georgia	Chattooga	3	4	2
Georgia	Cherokee	2	3	1
Georgia	Clarke	4	6	3
Georgia	Clay	2	3	0
Georgia	Clayton	11	15	8
Georgia	Clinch	2	3	0
Georgia	Cobb	33	43	26
Georgia	Coffee	9	12	7
Georgia	Colquitt	2	3	0
Georgia	Columbia	2	3	0
Georgia	Cook	2	3	0
Georgia	Coweta	2	3	1
Georgia	Crawford	2	3	0
Georgia	Crisp	2	3	0
Georgia	Dade	2	3	1
Georgia	Dawson	4	6	3
Georgia	Decatur	2	3	0
Georgia	DeKalb	46	60	36
Georgia	Dodge	3	4	2
Georgia	Dooly	2	3	0
Georgia	Dougherty	7	10	5
Georgia	Douglas	2	3	1
Georgia	Early	2	3	0
Georgia	Echols	2	3	0
Georgia	Effingham	2	3	0
Georgia	Elbert	2	3	0
Georgia	Emanuel	2	3	0
Georgia	Evans	2	3	0
Georgia	Fannin	2	3	0
Georgia	Fayette	3	4	2

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Georgia	Floyd	7	10	5
Georgia	Forsyth	2	3	0
Georgia	Franklin	2	3	1
Georgia	Fulton	65	85	51
Georgia	Gilmer	2	3	0
Georgia	Glascock	2	3	0
Georgia	Glynn	2	3	1
Georgia	Gordon	3	4	2
Georgia	Grady	2	3	0
Georgia	Greene	3	4	2
Georgia	Gwinnett	17	23	13
Georgia	Habersham	2	3	0
Georgia	Hall	3	4	2
Georgia	Hancock	2	3	0
Georgia	Haralson	2	3	0
Georgia	Harris	2	3	0
Georgia	Hart	2	3	0
Georgia	Heard	2	3	0
Georgia	Henry	7	10	5
Georgia	Houston	2	3	1
Georgia	Irwin	6	8	4
Georgia	Jackson	2	3	0
Georgia	Jasper	3	4	2
Georgia	Jeff Davis	2	3	0
Georgia	Jefferson	2	3	0
Georgia	Jenkins	2	3	0
Georgia	Johnson	2	3	1
Georgia	Jones	3	4	2
Georgia	Lamar	4	6	3
Georgia	Lanier	2	3	0
Georgia	Laurens	2	3	0
Georgia	Lee	2	3	0
Georgia	Liberty	38	50	30
Georgia	Lincoln	2	3	1
Georgia	Long	2	3	0
Georgia	Lowndes	3	4	2
Georgia	Lumpkin	2	3	1
Georgia	Macon	2	3	0
Georgia	Madison	2	3	0
Georgia	Marion	2	3	0
Georgia	McDuffie	2	3	0
Georgia	McIntosh	2	3	0
Georgia	Meriwether	2	3	0
Georgia	Miller	2	3	0
Georgia	Mitchell	2	3	0
Georgia	Monroe	2	3	0
Georgia	Montgomery	2	3	0
Georgia	Morgan	2	3	0
Georgia	Murray	2	3	0
Georgia	Muscogee	2	3	1
Georgia	Newton	2	3	1
Georgia	Oconee	2	3	0
Georgia	Oglethorpe	2	3	0
Georgia	Paulding	2	3	0
Georgia	Peach	2	3	0
Georgia	Pickens	2	3	0
Georgia	Pierce	2	3	0
Georgia	Pike	2	3	0
Georgia	Polk	2	3	1
Georgia	Pulaski	2	3	0
Georgia	Putnam	2	3	1
Georgia	Quitman	2	3	0
Georgia	Rabun	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Georgia	Randolph	2	3	0
Georgia	Richmond	8	11	6
Georgia	Rockdale	2	3	1
Georgia	Schley	2	3	0
Georgia	Screven	2	3	1
Georgia	Seminole	2	3	0
Georgia	Spalding	2	3	0
Georgia	Stephens	2	3	1
Georgia	Stewart	2	3	0
Georgia	Sumter	2	3	0
Georgia	Talbot	2	3	0
Georgia	Taliaferro	2	3	0
Georgia	Tattnall	2	3	0
Georgia	Taylor	2	3	0
Georgia	Telfair	6	8	4
Georgia	Terrell	2	3	1
Georgia	Thomas	7	10	5
Georgia	Tift	2	3	0
Georgia	Toombs	2	3	0
Georgia	Towns	2	3	0
Georgia	Treutlen	2	3	0
Georgia	Troup	14	19	11
Georgia	Turner	2	3	0
Georgia	Twiggs	2	3	0
Georgia	Union	2	3	0
Georgia	Upson	2	3	0
Georgia	Walker	2	3	0
Georgia	Walton	3	4	2
Georgia	Ware	2	3	0
Georgia	Warren	2	3	0
Georgia	Washington	2	3	0
Georgia	Wayne	2	3	0
Georgia	Webster	2	3	0
Georgia	Wheeler	2	3	0
Georgia	White	2	3	0
Georgia	Whitfield	4	6	3
Georgia	Wilcox	2	3	0
Georgia	Wilkes	2	3	0
Georgia	Wilkinson	2	3	0
Georgia	Worth	2	3	0
Guam	Guam	2	3	0
Hawaii	Hawaii	3	4	2
Hawaii	Honolulu	71	93	56
Hawaii	Kauai	2	3	0
Hawaii	Maui	2	3	0
Idaho	Ada	7	10	5
Idaho	Adams	2	3	0
Idaho	Bannock	8	11	6
Idaho	Bear Lake	2	3	0
Idaho	Benewah	2	3	0
Idaho	Bingham	2	3	1
Idaho	Blaine	4	6	3
Idaho	Boise	2	3	0
Idaho	Bonner	2	3	0
Idaho	Bonneville	4	6	3
Idaho	Boundary	2	3	0
Idaho	Butte	2	3	0
Idaho	Camas	2	3	0
Idaho	Canyon	3	4	2
Idaho	Caribou	2	3	0
Idaho	Cassia	2	3	0
Idaho	Clark	2	3	0
Idaho	Clearwater	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Idaho	Custer	2	3	0
Idaho	Elmore	4	6	3
Idaho	Franklin	2	3	0
Idaho	Fremont	2	3	0
Idaho	Gem	2	3	0
Idaho	Gooding	2	3	0
Idaho	Idaho	2	3	0
Idaho	Jefferson	2	3	0
Idaho	Jerome	2	3	1
Idaho	Kootenai	4	6	3
Idaho	Latah	2	3	0
Idaho	Lemhi	2	3	0
Idaho	Lewis	2	3	0
Idaho	Lincoln	2	3	0
Idaho	Madison	2	3	0
Idaho	Minidoka	2	3	0
Idaho	Nez Perce	2	3	0
Idaho	Oneida	2	3	0
Idaho	Owyhee	2	3	0
Idaho	Payette	2	3	0
Idaho	Power	2	3	0
Idaho	Shoshone	4	6	3
Idaho	Teton	2	3	0
Idaho	Twin Falls	17	23	13
Idaho	Valley	2	3	0
Idaho	Washington	6	8	4
Illinois	Adams	14	19	11
Illinois	Alexander	2	3	0
Illinois	Bond	2	3	0
Illinois	Boone	2	3	0
Illinois	Brown	2	3	1
Illinois	Bureau	8	11	6
Illinois	Calhoun	2	3	0
Illinois	Carroll	2	3	0
Illinois	Cass	2	3	0
Illinois	Champaign	16	21	12
Illinois	Christian	2	3	0
Illinois	Clark	2	3	1
Illinois	Clay	2	3	0
Illinois	Clinton	2	3	0
Illinois	Coles	7	10	5
Illinois	Cook	318	415	252
Illinois	Crawford	2	3	1
Illinois	Cumberland	2	3	0
Illinois	De Witt	2	3	0
Illinois	DeKalb	3	4	2
Illinois	Douglas	2	3	1
Illinois	DuPage	36	47	28
Illinois	Edgar	2	3	0
Illinois	Edwards	2	3	0
Illinois	Effingham	3	4	2
Illinois	Fayette	2	3	0
Illinois	Ford	2	3	1
Illinois	Franklin	2	3	1
Illinois	Fulton	11	15	8
Illinois	Gallatin	2	3	1
Illinois	Greene	2	3	0
Illinois	Grundy	2	3	0
Illinois	Hamilton	2	3	0
Illinois	Hancock	4	6	3
Illinois	Hardin	2	3	0
Illinois	Henderson	2	3	0
Illinois	Henry	14	19	11

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Illinois	Iroquois	2	3	1
Illinois	Jackson	6	8	4
Illinois	Jasper	2	3	0
Illinois	Jefferson	2	3	0
Illinois	Jersey	2	3	0
Illinois	Jo Daviess	2	3	0
Illinois	Johnson	2	3	0
Illinois	Kane	48	63	38
Illinois	Kankakee	13	17	10
Illinois	Kendall	2	3	0
Illinois	Knox	19	25	15
Illinois	La Salle	8	11	6
Illinois	Lake	9	12	7
Illinois	Lawrence	2	3	1
Illinois	Lee	4	6	3
Illinois	Livingston	2	3	1
Illinois	Logan	6	8	4
Illinois	Macon	4	6	3
Illinois	Macoupin	2	3	0
Illinois	Madison	11	15	8
Illinois	Marion	2	3	1
Illinois	Marshall	2	3	0
Illinois	Mason	2	3	0
Illinois	Massac	2	3	0
Illinois	McDonough	2	3	0
Illinois	McHenry	3	4	2
Illinois	McLean	16	21	12
Illinois	Menard	2	3	1
Illinois	Mercer	12	16	9
Illinois	Monroe	18	24	14
Illinois	Montgomery	2	3	1
Illinois	Morgan	2	3	0
Illinois	Moultrie	3	4	2
Illinois	Ogle	2	3	0
Illinois	Peoria	8	11	6
Illinois	Perry	6	8	4
Illinois	Piatt	2	3	0
Illinois	Pike	2	3	0
Illinois	Pope	2	3	0
Illinois	Pulaski	2	3	0
Illinois	Putnam	2	3	0
Illinois	Randolph	6	8	4
Illinois	Richland	4	6	3
Illinois	Rock Island	11	15	8
Illinois	Saline	2	3	0
Illinois	Sangamon	26	34	20
Illinois	Schuyler	3	4	2
Illinois	Scott	2	3	0
Illinois	Shelby	2	3	1
Illinois	St. Clair	6	8	4
Illinois	Stark	2	3	0
Illinois	Stephenson	2	3	0
Illinois	Tazewell	6	8	4
Illinois	Union	2	3	0
Illinois	Vermilion	21	28	16
Illinois	Wabash	2	3	0
Illinois	Warren	2	3	0
Illinois	Washington	2	3	0
Illinois	Wayne	2	3	0
Illinois	White	2	3	0
Illinois	Whiteside	4	6	3
Illinois	Will	9	12	7
Illinois	Williamson	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Illinois	Winnebago	7	10	5
Illinois	Woodford	2	3	0
Indiana	Adams	2	3	0
Indiana	Allen	9	12	7
Indiana	Bartholomew	2	3	0
Indiana	Benton	2	3	0
Indiana	Blackford	2	3	1
Indiana	Boone	2	3	1
Indiana	Brown	2	3	0
Indiana	Carroll	2	3	0
Indiana	Cass	2	3	0
Indiana	Clark	2	3	1
Indiana	Clay	2	3	1
Indiana	Clinton	2	3	0
Indiana	Crawford	2	3	0
Indiana	Daviess	2	3	1
Indiana	De Kalb	3	4	2
Indiana	Dearborn	2	3	0
Indiana	Decatur	2	3	0
Indiana	Delaware	2	3	1
Indiana	Dubois	2	3	0
Indiana	Elkhart	2	3	0
Indiana	Fayette	2	3	0
Indiana	Floyd	3	4	2
Indiana	Fountain	2	3	0
Indiana	Franklin	2	3	0
Indiana	Fulton	2	3	0
Indiana	Gibson	2	3	0
Indiana	Grant	7	10	5
Indiana	Greene	3	4	2
Indiana	Hamilton	3	4	2
Indiana	Hancock	2	3	0
Indiana	Harrison	3	4	2
Indiana	Hendricks	6	8	4
Indiana	Henry	2	3	1
Indiana	Howard	2	3	0
Indiana	Huntington	2	3	0
Indiana	Jackson	2	3	0
Indiana	Jasper	2	3	1
Indiana	Jay	2	3	0
Indiana	Jefferson	2	3	1
Indiana	Jennings	2	3	0
Indiana	Johnson	6	8	4
Indiana	Knox	3	4	2
Indiana	Kosciusko	3	4	2
Indiana	La Porte	4	6	3
Indiana	Lagrange	2	3	0
Indiana	Lake	57	75	45
Indiana	Lawrence	2	3	0
Indiana	Madison	8	11	6
Indiana	Marion	33	43	26
Indiana	Marshall	2	3	0
Indiana	Martin	2	3	0
Indiana	Miami	4	6	3
Indiana	Monroe	7	10	5
Indiana	Montgomery	3	4	2
Indiana	Morgan	2	3	0
Indiana	Newton	2	3	0
Indiana	Noble	2	3	0
Indiana	Ohio	2	3	0
Indiana	Orange	2	3	1
Indiana	Owen	2	3	0
Indiana	Parke	3	4	2

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Indiana	Perry	2	3	0
Indiana	Pike	2	3	0
Indiana	Porter	9	12	7
Indiana	Posey	6	8	4
Indiana	Pulaski	2	3	0
Indiana	Putnam	2	3	0
Indiana	Randolph	2	3	0
Indiana	Ripley	2	3	0
Indiana	Rush	2	3	0
Indiana	Scott	2	3	0
Indiana	Shelby	2	3	1
Indiana	Spencer	2	3	0
Indiana	St. Joseph	2	3	1
Indiana	Starke	2	3	0
Indiana	Steuben	2	3	0
Indiana	Sullivan	2	3	0
Indiana	Switzerland	2	3	0
Indiana	Tippecanoe	2	3	1
Indiana	Tipton	2	3	0
Indiana	Union	2	3	0
Indiana	Vanderburgh	3	4	2
Indiana	Vermillion	3	4	2
Indiana	Vigo	4	6	3
Indiana	Wabash	2	3	0
Indiana	Warren	2	3	0
Indiana	Warrick	2	3	0
Indiana	Washington	4	6	3
Indiana	Wayne	2	3	1
Indiana	Wells	2	3	0
Indiana	White	2	3	0
Indiana	Whitley	2	3	0
Iowa	Adair	2	3	0
Iowa	Adams	2	3	1
Iowa	Allamakee	2	3	0
Iowa	Appanoose	2	3	0
Iowa	Audubon	2	3	0
Iowa	Benton	4	6	3
Iowa	Black Hawk	6	8	4
Iowa	Boone	4	6	3
Iowa	Bremer	2	3	1
Iowa	Buchanan	6	8	4
Iowa	Buena Vista	11	15	8
Iowa	Butler	2	3	0
Iowa	Calhoun	2	3	0
Iowa	Carroll	2	3	1
Iowa	Cass	3	4	2
Iowa	Cedar	4	6	3
Iowa	Cerro Gordo	9	12	7
Iowa	Cherokee	3	4	2
Iowa	Chickasaw	2	3	1
Iowa	Clarke	2	3	0
Iowa	Clay	2	3	0
Iowa	Clayton	2	3	0
Iowa	Clinton	2	3	1
Iowa	Crawford	2	3	1
Iowa	Dallas	4	6	3
Iowa	Davis	2	3	0
Iowa	Decatur	2	3	1
Iowa	Delaware	2	3	0
Iowa	Des Moines	2	3	0
Iowa	Dickinson	2	3	1
Iowa	Dubuque	17	23	13
Iowa	Emmet	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Iowa	Fayette	2	3	0
Iowa	Floyd	9	12	7
Iowa	Franklin	2	3	0
Iowa	Fremont	2	3	0
Iowa	Greene	2	3	0
Iowa	Grundy	2	3	0
Iowa	Guthrie	2	3	1
Iowa	Hamilton	4	6	3
Iowa	Hancock	2	3	0
Iowa	Hardin	3	4	2
Iowa	Harrison	2	3	0
Iowa	Henry	2	3	0
Iowa	Howard	2	3	1
Iowa	Humboldt	2	3	0
Iowa	Ida	2	3	0
Iowa	Iowa	6	8	4
Iowa	Jackson	2	3	0
Iowa	Jasper	7	10	5
Iowa	Jefferson	2	3	0
Iowa	Johnson	6	8	4
Iowa	Jones	4	6	3
Iowa	Keokuk	2	3	0
Iowa	Kossuth	2	3	0
Iowa	Lee	3	4	2
Iowa	Linn	11	15	8
Iowa	Louisa	2	3	0
Iowa	Lucas	2	3	1
Iowa	Lyon	8	11	6
Iowa	Madison	2	3	0
Iowa	Mahaska	2	3	0
Iowa	Marion	2	3	0
Iowa	Marshall	12	16	9
Iowa	Mills	2	3	0
Iowa	Mitchell	4	6	3
Iowa	Monona	2	3	0
Iowa	Monroe	2	3	0
Iowa	Montgomery	2	3	1
Iowa	Muscatine	3	4	2
Iowa	O'Brien	2	3	1
Iowa	Osceola	2	3	0
Iowa	Page	2	3	0
Iowa	Palo Alto	2	3	0
Iowa	Plymouth	9	12	7
Iowa	Pocahontas	2	3	0
Iowa	Polk	21	28	16
Iowa	Pottawattamie	12	16	9
Iowa	Poweshiek	8	11	6
Iowa	Ringgold	2	3	0
Iowa	Sac	2	3	0
Iowa	Scott	4	6	3
Iowa	Shelby	2	3	0
Iowa	Sioux	6	8	4
Iowa	Story	3	4	2
Iowa	Tama	6	8	4
Iowa	Taylor	2	3	0
Iowa	Union	2	3	0
Iowa	Van Buren	2	3	0
Iowa	Wapello	2	3	0
Iowa	Warren	2	3	0
Iowa	Washington	2	3	0
Iowa	Wayne	2	3	0
Iowa	Webster	9	12	7
Iowa	Winnebago	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Iowa	Winneshiek	2	3	0
Iowa	Woodbury	8	11	6
Iowa	Worth	2	3	0
Iowa	Wright	2	3	0
Kansas	Allen	2	3	0
Kansas	Anderson	2	3	0
Kansas	Atchison	2	3	0
Kansas	Barber	2	3	0
Kansas	Barton	2	3	0
Kansas	Bourbon	2	3	0
Kansas	Brown	2	3	1
Kansas	Butler	3	4	2
Kansas	Chase	2	3	0
Kansas	Chautauqua	2	3	0
Kansas	Cherokee	2	3	0
Kansas	Cheyenne	2	3	0
Kansas	Clark	2	3	0
Kansas	Clay	2	3	0
Kansas	Cloud	2	3	1
Kansas	Coffey	2	3	0
Kansas	Comanche	2	3	0
Kansas	Cowley	2	3	0
Kansas	Crawford	2	3	0
Kansas	Decatur	3	4	2
Kansas	Dickinson	3	4	2
Kansas	Doniphan	2	3	0
Kansas	Douglas	4	6	3
Kansas	Edwards	2	3	0
Kansas	Elk	2	3	1
Kansas	Ellis	3	4	2
Kansas	Ellsworth	2	3	1
Kansas	Finney	2	3	0
Kansas	Ford	2	3	0
Kansas	Franklin	2	3	0
Kansas	Geary	4	6	3
Kansas	Gove	2	3	0
Kansas	Graham	2	3	0
Kansas	Grant	2	3	0
Kansas	Gray	2	3	0
Kansas	Greeley	4	6	3
Kansas	Greenwood	2	3	0
Kansas	Hamilton	2	3	0
Kansas	Harper	2	3	0
Kansas	Harvey	3	4	2
Kansas	Haskell	2	3	0
Kansas	Hodgeman	8	11	6
Kansas	Jackson	2	3	0
Kansas	Jefferson	2	3	0
Kansas	Jewell	2	3	1
Kansas	Johnson	36	47	28
Kansas	Kearny	2	3	0
Kansas	Kingman	2	3	1
Kansas	Kiowa	2	3	0
Kansas	Labette	3	4	2
Kansas	Lane	2	3	0
Kansas	Leavenworth	2	3	0
Kansas	Lincoln	2	3	0
Kansas	Linn	2	3	0
Kansas	Logan	2	3	0
Kansas	Lyon	2	3	0
Kansas	Marion	2	3	0
Kansas	Marshall	2	3	1
Kansas	McPherson	4	6	3

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Kansas	Meade	2	3	0
Kansas	Miami	2	3	1
Kansas	Mitchell	2	3	1
Kansas	Montgomery	2	3	0
Kansas	Morris	2	3	0
Kansas	Morton	6	8	4
Kansas	Nemaha	2	3	0
Kansas	Neosho	2	3	0
Kansas	Ness	2	3	0
Kansas	Norton	2	3	0
Kansas	Osage	2	3	0
Kansas	Osborne	2	3	1
Kansas	Ottawa	2	3	1
Kansas	Pawnee	2	3	0
Kansas	Phillips	2	3	0
Kansas	Pottawatomie	3	4	2
Kansas	Pratt	2	3	0
Kansas	Rawlins	2	3	0
Kansas	Reno	4	6	3
Kansas	Republic	2	3	0
Kansas	Rice	2	3	0
Kansas	Riley	6	8	4
Kansas	Rooks	2	3	0
Kansas	Rush	2	3	0
Kansas	Russell	2	3	0
Kansas	Saline	9	12	7
Kansas	Scott	2	3	0
Kansas	Sedgwick	23	30	18
Kansas	Seward	3	4	2
Kansas	Shawnee	17	23	13
Kansas	Sheridan	2	3	0
Kansas	Sherman	2	3	0
Kansas	Smith	2	3	0
Kansas	Stafford	3	4	2
Kansas	Stanton	2	3	0
Kansas	Stevens	8	11	6
Kansas	Sumner	2	3	0
Kansas	Thomas	2	3	0
Kansas	Trego	2	3	0
Kansas	Wabaunsee	2	3	0
Kansas	Wallace	2	3	0
Kansas	Washington	2	3	1
Kansas	Wichita	3	4	2
Kansas	Wilson	2	3	0
Kansas	Woodson	2	3	0
Kansas	Wyandotte	31	41	24
Kentucky	Adair	2	3	0
Kentucky	Allen	2	3	0
Kentucky	Anderson	2	3	1
Kentucky	Ballard	2	3	0
Kentucky	Barren	3	4	2
Kentucky	Bath	2	3	0
Kentucky	Bell	8	11	6
Kentucky	Boone	8	11	6
Kentucky	Bourbon	2	3	0
Kentucky	Boyd	2	3	0
Kentucky	Boyle	2	3	0
Kentucky	Bracken	2	3	0
Kentucky	Breathitt	2	3	0
Kentucky	Breckinridge	2	3	0
Kentucky	Bullitt	12	16	9
Kentucky	Butler	2	3	0
Kentucky	Caldwell	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Kentucky	Calloway	2	3	1
Kentucky	Campbell	3	4	2
Kentucky	Carlisle	2	3	0
Kentucky	Carroll	2	3	0
Kentucky	Carter	2	3	0
Kentucky	Casey	2	3	0
Kentucky	Christian	2	3	0
Kentucky	Clark	2	3	0
Kentucky	Clay	2	3	1
Kentucky	Clinton	2	3	0
Kentucky	Crittenden	2	3	0
Kentucky	Cumberland	2	3	0
Kentucky	Daviess	2	3	0
Kentucky	Edmonson	2	3	0
Kentucky	Elliott	2	3	0
Kentucky	Estill	2	3	0
Kentucky	Fayette	21	28	16
Kentucky	Fleming	2	3	0
Kentucky	Floyd	2	3	0
Kentucky	Franklin	2	3	0
Kentucky	Fulton	2	3	0
Kentucky	Gallatin	2	3	0
Kentucky	Garrard	2	3	0
Kentucky	Grant	2	3	0
Kentucky	Graves	2	3	0
Kentucky	Grayson	2	3	0
Kentucky	Green	2	3	0
Kentucky	Greenup	2	3	0
Kentucky	Hancock	2	3	0
Kentucky	Hardin	3	4	2
Kentucky	Harlan	2	3	0
Kentucky	Harrison	2	3	0
Kentucky	Hart	2	3	0
Kentucky	Henderson	2	3	1
Kentucky	Henry	2	3	0
Kentucky	Hickman	2	3	0
Kentucky	Hopkins	4	6	3
Kentucky	Jackson	2	3	0
Kentucky	Jefferson	21	28	16
Kentucky	Jessamine	2	3	0
Kentucky	Johnson	2	3	1
Kentucky	Kenton	14	19	11
Kentucky	Knott	2	3	0
Kentucky	Knox	2	3	0
Kentucky	Larue	2	3	0
Kentucky	Laurel	2	3	0
Kentucky	Lawrence	2	3	0
Kentucky	Lee	2	3	0
Kentucky	Leslie	2	3	0
Kentucky	Letcher	2	3	0
Kentucky	Lewis	2	3	0
Kentucky	Lincoln	2	3	0
Kentucky	Livingston	2	3	0
Kentucky	Logan	7	10	5
Kentucky	Lyon	2	3	0
Kentucky	Madison	6	8	4
Kentucky	Magoffin	2	3	1
Kentucky	Marion	2	3	0
Kentucky	Marshall	2	3	0
Kentucky	Martin	2	3	0
Kentucky	Mason	2	3	0
Kentucky	McCracken	3	4	2
Kentucky	McCreary	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Kentucky	McLean	2	3	0
Kentucky	Meade	2	3	0
Kentucky	Menifee	2	3	0
Kentucky	Mercer	3	4	2
Kentucky	Metcalfe	2	3	0
Kentucky	Monroe	2	3	0
Kentucky	Montgomery	3	4	2
Kentucky	Morgan	2	3	0
Kentucky	Muhlenberg	2	3	1
Kentucky	Nelson	2	3	0
Kentucky	Nicholas	2	3	0
Kentucky	Ohio	2	3	0
Kentucky	Oldham	2	3	0
Kentucky	Owen	2	3	0
Kentucky	Owsley	2	3	0
Kentucky	Pendleton	2	3	0
Kentucky	Perry	2	3	0
Kentucky	Pike	8	11	6
Kentucky	Powell	2	3	0
Kentucky	Pulaski	7	10	5
Kentucky	Robertson	2	3	0
Kentucky	Rockcastle	2	3	0
Kentucky	Rowan	2	3	0
Kentucky	Russell	2	3	0
Kentucky	Scott	2	3	0
Kentucky	Shelby	2	3	0
Kentucky	impson	2	3	0
Kentucky	Spencer	2	3	0
Kentucky	Taylor	2	3	0
Kentucky	Todd	2	3	0
Kentucky	Trigg	2	3	0
Kentucky	Trimble	2	3	0
Kentucky	Union	2	3	0
Kentucky	Warren	4	6	3
Kentucky	Washington	2	3	0
Kentucky	Wayne	2	3	0
Kentucky	Webster	2	3	0
Kentucky	Whitley	2	3	0
Kentucky	Wolfe	2	3	0
Kentucky	Woodford	2	3	0
Louisiana	Acadia	2	3	0
Louisiana	Allen	2	3	0
Louisiana	Ascension	2	3	0
Louisiana	Assumption	2	3	0
Louisiana	Avoyelles	3	4	2
Louisiana	Beauregard	2	3	0
Louisiana	Bienville	2	3	0
Louisiana	Bossier	2	3	1
Louisiana	Caddo	36	47	28
Louisiana	Calcasieu	2	3	0
Louisiana	Caldwell	2	3	0
Louisiana	Cameron	2	3	0
Louisiana	Catahoula	2	3	0
Louisiana	Claiborne	3	4	2
Louisiana	Concordia	2	3	0
Louisiana	De Soto	2	3	1
Louisiana	East Baton Rouge	57	75	45
Louisiana	East Carroll	2	3	0
Louisiana	East Feliciana	4	6	3
Louisiana	Evangeline	2	3	0
Louisiana	Franklin	2	3	0
Louisiana	Grant	2	3	0
Louisiana	Iberia	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Louisiana	Iberville	3	4	2
Louisiana	Jackson	2	3	0
Louisiana	Jefferson	55	72	43
Louisiana	Jefferson Davis	2	3	0
Louisiana	La Salle	2	3	0
Louisiana	Lafayette	7	10	5
Louisiana	Lafourche	2	3	0
Louisiana	Lincoln	2	3	1
Louisiana	Livingston	4	6	3
Louisiana	Madison	2	3	0
Louisiana	Morehouse	4	6	3
Louisiana	Natchitoches	2	3	0
Louisiana	Orleans	63	83	50
Louisiana	Ouachita	6	8	4
Louisiana	Plaquemines	2	3	0
Louisiana	Pointe Coupee	9	12	7
Louisiana	Rapides	6	8	4
Louisiana	Red River	2	3	0
Louisiana	Richland	2	3	1
Louisiana	Sabine	2	3	0
Louisiana	St. Bernard	13	17	10
Louisiana	St. Charles	3	4	2
Louisiana	St. Helena	2	3	0
Louisiana	St. James	2	3	0
Louisiana	St. John the Baptist	2	3	0
Louisiana	St. Landry	2	3	0
Louisiana	St. Martin	2	3	0
Louisiana	St. Mary	4	6	3
Louisiana	St. Tammany	8	11	6
Louisiana	Tangipahoa	2	3	1
Louisiana	Tensas	2	3	0
Louisiana	Terrebonne	2	3	0
Louisiana	Union	2	3	0
Louisiana	Vermilion	2	3	0
Louisiana	Vernon	2	3	0
Louisiana	Washington	4	6	3
Louisiana	Webster	2	3	1
Louisiana	West Baton Rouge	2	3	0
Louisiana	West Carroll	2	3	0
Louisiana	West Feliciana	2	3	1
Louisiana	Winn	2	3	0
Maine	Androscoggin	22	29	17
Maine	Aroostook	2	3	1
Maine	Cumberland	9	12	7
Maine	Franklin	2	3	0
Maine	Hancock	2	3	0
Maine	Kennebec	45	59	35
Maine	Knox	8	11	6
Maine	Lincoln	2	3	0
Maine	Oxford	2	3	0
Maine	Penobscot	16	21	12
Maine	Piscataquis	2	3	0
Maine	Sagadahoc	2	3	0
Maine	Somerset	2	3	0
Maine	Waldo	3	4	2
Maine	Washington	2	3	0
Maine	York	7	10	5
Mariana Islands	Mariana Islands	2	3	0
Maryland	Allegany	3	4	2
Maryland	Anne Arundel	67	88	53
Maryland	Baltimore	143	187	113
Maryland	Baltimore City	90	118	71
Maryland	Calvert	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Maryland	Caroline	2	3	0
Maryland	Carroll	8	11	6
Maryland	Cecil	11	15	8
Maryland	Charles	11	15	8
Maryland	Dorchester	8	11	6
Maryland	Frederick	12	16	9
Maryland	Garrett	2	3	0
Maryland	Harford	13	17	10
Maryland	Howard	36	47	28
Maryland	Kent	2	3	1
Maryland	Montgomery	84	110	66
Maryland	Prince George's	152	199	120
Maryland	Queen Anne's	2	3	0
Maryland	Somerset	3	4	2
Maryland	St. Mary's	2	3	1
Maryland	Talbot	3	4	2
Maryland	Washington	7	10	5
Maryland	Wicomico	4	6	3
Maryland	Worcester	7	10	5
Massachusetts	Barnstable	9	12	7
Massachusetts	Berkshire	2	3	0
Massachusetts	Bristol	11	15	8
Massachusetts	Dukes	2	3	0
Massachusetts	Essex	17	23	13
Massachusetts	Franklin	2	3	0
Massachusetts	Hampden	21	28	16
Massachusetts	Hampshire	2	3	1
Massachusetts	Middlesex	84	110	66
Massachusetts	Nantucket	2	3	0
Massachusetts	Norfolk	33	43	26
Massachusetts	Plymouth	17	23	13
Massachusetts	Suffolk	77	101	61
Massachusetts	Worcester	43	57	34
Michigan	Alcona	2	3	0
Michigan	Alger	2	3	0
Michigan	Allegan	2	3	0
Michigan	Alpena	2	3	0
Michigan	Antrim	2	3	0
Michigan	Arenac	2	3	0
Michigan	Baraga	2	3	0
Michigan	Barry	2	3	1
Michigan	Bay	2	3	0
Michigan	Benzie	2	3	0
Michigan	Berrien	8	11	6
Michigan	Branch	2	3	0
Michigan	Calhoun	6	8	4
Michigan	Cass	2	3	0
Michigan	Charlevoix	2	3	0
Michigan	Cheboygan	2	3	0
Michigan	Chippewa	2	3	0
Michigan	Clare	2	3	0
Michigan	Clinton	2	3	0
Michigan	Crawford	2	3	0
Michigan	Delta	2	3	0
Michigan	Dickinson	2	3	0
Michigan	Eaton	2	3	0
Michigan	Emmet	2	3	0
Michigan	Genesee	7	10	5
Michigan	Gladwin	3	4	2
Michigan	Gogebic	2	3	0
Michigan	Grand Traverse	2	3	0
Michigan	Gratiot	2	3	0
Michigan	Hillsdale	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Michigan	Houghton	2	3	0
Michigan	Huron	2	3	0
Michigan	Ingham	3	4	2
Michigan	Ionia	2	3	0
Michigan	Iosco	2	3	0
Michigan	Iron	2	3	0
Michigan	Isabella	3	4	2
Michigan	Jackson	3	4	2
Michigan	Kalamazoo	8	11	6
Michigan	Kalkaska	2	3	0
Michigan	Kent	4	6	3
Michigan	Keweenaw	2	3	0
Michigan	Lake	2	3	0
Michigan	Lapeer	3	4	2
Michigan	Leelanau	2	3	0
Michigan	Lenawee	2	3	0
Michigan	Livingston	3	4	2
Michigan	Luce	2	3	0
Michigan	Mackinac	2	3	1
Michigan	Macomb	34	45	27
Michigan	Manistee	2	3	1
Michigan	Marquette	6	8	4
Michigan	Mason	2	3	0
Michigan	Mecosta	2	3	0
Michigan	Menominee	2	3	0
Michigan	Midland	2	3	0
Michigan	Missaukee	2	3	0
Michigan	Monroe	3	4	2
Michigan	Montcalm	2	3	0
Michigan	Montmorency	2	3	0
Michigan	Muskegon	2	3	1
Michigan	Newaygo	2	3	0
Michigan	Oakland	74	97	58
Michigan	Oceana	2	3	0
Michigan	Ogemaw	2	3	0
Michigan	Ontonagon	2	3	0
Michigan	Osceola	2	3	0
Michigan	Oscoda	2	3	0
Michigan	Otsego	3	4	2
Michigan	Ottawa	2	3	0
Michigan	Presque Isle	2	3	0
Michigan	Roscommon	2	3	0
Michigan	Saginaw	23	30	18
Michigan	Sanilac	2	3	0
Michigan	Schoolcraft	2	3	0
Michigan	Shiawassee	2	3	1
Michigan	St. Clair	2	3	0
Michigan	St. Joseph	2	3	0
Michigan	Tuscola	8	11	6
Michigan	Van Buren	6	8	4
Michigan	Washtenaw	8	11	6
Michigan	Wayne	193	252	153
Michigan	Wexford	2	3	0
Minnesota	Aitkin	2	3	1
Minnesota	Anoka	51	67	40
Minnesota	Becker	6	8	4
Minnesota	Beltrami	2	3	1
Minnesota	Benton	7	10	5
Minnesota	Big Stone	2	3	0
Minnesota	Blue Earth	2	3	1
Minnesota	Brown	2	3	0
Minnesota	Carlton	3	4	2
Minnesota	Carver	8	11	6

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Minnesota	Cass	8	11	6
Minnesota	Chippewa	2	3	1
Minnesota	Chisago	3	4	2
Minnesota	Clay	2	3	1
Minnesota	Clearwater	2	3	0
Minnesota	Cook	2	3	0
Minnesota	Cottonwood	2	3	0
Minnesota	Crow Wing	7	10	5
Minnesota	Dakota	67	88	53
Minnesota	Dodge	2	3	0
Minnesota	Douglas	4	6	3
Minnesota	Faribault	2	3	1
Minnesota	Fillmore	2	3	0
Minnesota	Freeborn	2	3	0
Minnesota	Goodhue	8	11	6
Minnesota	Grant	4	6	3
Minnesota	Hennepin	264	344	209
Minnesota	Houston	6	8	4
Minnesota	Hubbard	4	6	3
Minnesota	Isanti	2	3	0
Minnesota	Itasca	2	3	0
Minnesota	Jackson	2	3	0
Minnesota	Kanabec	2	3	0
Minnesota	Kandiyohi	6	8	4
Minnesota	Kittson	11	15	8
Minnesota	Koochiching	2	3	0
Minnesota	Lac qui Parle	2	3	0
Minnesota	Lake	2	3	0
Minnesota	Lake of the Woods	2	3	1
Minnesota	Le Sueur	2	3	0
Minnesota	Lincoln	2	3	0
Minnesota	Lyon	2	3	0
Minnesota	Mahnomen	2	3	0
Minnesota	Marshall	9	12	7
Minnesota	Martin	2	3	0
Minnesota	McLeod	14	19	11
Minnesota	Meeker	4	6	3
Minnesota	Mille Lacs	4	6	3
Minnesota	Morrison	7	10	5
Minnesota	Mower	2	3	1
Minnesota	Murray	2	3	0
Minnesota	Nicollet	7	10	5
Minnesota	Nobles	4	6	3
Minnesota	Norman	2	3	0
Minnesota	Olmsted	22	29	17
Minnesota	Otter Tail	41	54	32
Minnesota	Pennington	3	4	2
Minnesota	Pine	6	8	4
Minnesota	Pipestone	2	3	0
Minnesota	Polk	2	3	0
Minnesota	Pope	3	4	2
Minnesota	Ramsey	100	131	79
Minnesota	Red Lake	2	3	0
Minnesota	Redwood	2	3	1
Minnesota	Renville	2	3	1
Minnesota	Rice	9	12	7
Minnesota	Rock	3	4	2
Minnesota	Roseau	9	12	7
Minnesota	Scott	4	6	3
Minnesota	Sherburne	29	38	23
Minnesota	Sibley	2	3	0
Minnesota	St. Louis	50	66	39
Minnesota	Stearns	21	28	16

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Minnesota	Steele	6	8	4
Minnesota	Stevens	2	3	0
Minnesota	Swift	2	3	0
Minnesota	Todd	6	8	4
Minnesota	Traverse	2	3	0
Minnesota	Wabasha	2	3	0
Minnesota	Wadena	2	3	0
Minnesota	Waseca	2	3	0
Minnesota	Washington	23	30	18
Minnesota	Watonwan	2	3	0
Minnesota	Wilkin	2	3	0
Minnesota	Winona	4	6	3
Minnesota	Wright	6	8	4
Minnesota	Yellow Medicine	2	3	0
Mississippi	Adams	2	3	0
Mississippi	Alcorn	2	3	1
Mississippi	Amite	2	3	0
Mississippi	Attala	2	3	0
Mississippi	Benton	2	3	0
Mississippi	Bolivar	2	3	0
Mississippi	Calhoun	13	17	10
Mississippi	Carroll	2	3	0
Mississippi	Chickasaw	2	3	0
Mississippi	Choctaw	2	3	0
Mississippi	Claiborne	2	3	0
Mississippi	Clarke	2	3	0
Mississippi	Clay	2	3	0
Mississippi	Coahoma	3	4	2
Mississippi	Copiah	2	3	0
Mississippi	Covington	2	3	0
Mississippi	DeSoto	2	3	1
Mississippi	Forrest	6	8	4
Mississippi	Franklin	2	3	0
Mississippi	George	2	3	0
Mississippi	Greene	2	3	0
Mississippi	Grenada	4	6	3
Mississippi	Hancock	2	3	1
Mississippi	Harrison	21	28	16
Mississippi	Hinds	31	41	24
Mississippi	Holmes	2	3	0
Mississippi	Humphreys	2	3	1
Mississippi	Issaquena	2	3	0
Mississippi	Itawamba	2	3	0
Mississippi	Jackson	6	8	4
Mississippi	Jasper	2	3	0
Mississippi	Jefferson	2	3	0
Mississippi	Jefferson Davis	2	3	0
Mississippi	Jones	2	3	0
Mississippi	Kemper	2	3	0
Mississippi	Lafayette	4	6	3
Mississippi	Lamar	3	4	2
Mississippi	Lauderdale	6	8	4
Mississippi	Lawrence	2	3	0
Mississippi	Leake	2	3	0
Mississippi	Lee	6	8	4
Mississippi	Leflore	2	3	0
Mississippi	Lincoln	2	3	0
Mississippi	Lowndes	2	3	0
Mississippi	Madison	2	3	0
Mississippi	Marion	2	3	0
Mississippi	Marshall	4	6	3
Mississippi	Monroe	2	3	0
Mississippi	Montgomery	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Mississippi	Neshoba	3	4	2
Mississippi	Newton	2	3	1
Mississippi	Noxubee	2	3	0
Mississippi	Oktibbeha	6	8	4
Mississippi	Panola	2	3	0
Mississippi	Pearl River	6	8	4
Mississippi	Perry	2	3	0
Mississippi	Pike	3	4	2
Mississippi	Pontotoc	2	3	0
Mississippi	Prentiss	2	3	0
Mississippi	Quitman	2	3	0
Mississippi	Rankin	6	8	4
Mississippi	Scott	2	3	0
Mississippi	Sharkey	2	3	0
Mississippi	Simpson	2	3	0
Mississippi	Smith	2	3	0
Mississippi	Stone	2	3	0
Mississippi	Sunflower	4	6	3
Mississippi	Tallahatchie	2	3	0
Mississippi	Tate	2	3	0
Mississippi	Tippah	3	4	2
Mississippi	Tishomingo	11	15	8
Mississippi	Tunica	2	3	0
Mississippi	Union	4	6	3
Mississippi	Walthall	2	3	0
Mississippi	Warren	2	3	0
Mississippi	Washington	4	6	3
Mississippi	Wayne	2	3	0
Mississippi	Webster	2	3	0
Mississippi	Wilkinson	2	3	0
Mississippi	Winston	2	3	0
Mississippi	Yalobusha	2	3	0
Mississippi	Yazoo	3	4	2
Missouri	Adair	2	3	0
Missouri	Andrew	2	3	0
Missouri	Atchison	3	4	2
Missouri	Audrain	2	3	0
Missouri	Barry	2	3	0
Missouri	Barton	2	3	0
Missouri	Bates	2	3	0
Missouri	Benton	2	3	0
Missouri	Bollinger	2	3	0
Missouri	Boone	6	8	4
Missouri	Buchanan	8	11	6
Missouri	Butler	2	3	0
Missouri	Caldwell	2	3	0
Missouri	Callaway	11	15	8
Missouri	Camden	2	3	0
Missouri	Cape Girardeau	4	6	3
Missouri	Carroll	2	3	0
Missouri	Carter	2	3	0
Missouri	Cass	2	3	0
Missouri	Cedar	2	3	0
Missouri	Chariton	2	3	1
Missouri	Christian	2	3	0
Missouri	Clark	2	3	0
Missouri	Clay	29	38	23
Missouri	Clinton	2	3	0
Missouri	Cole	2	3	1
Missouri	Cooper	2	3	0
Missouri	Crawford	2	3	0
Missouri	Dade	2	3	0
Missouri	Dallas	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Missouri	Daviess	2	3	0
Missouri	DeKalb	2	3	0
Missouri	Dent	2	3	0
Missouri	Douglas	2	3	0
Missouri	Dunklin	2	3	0
Missouri	Franklin	2	3	0
Missouri	Gasconade	2	3	0
Missouri	Gentry	2	3	0
Missouri	Greene	4	6	3
Missouri	Grundy	2	3	0
Missouri	Harrison	2	3	0
Missouri	Henry	2	3	0
Missouri	Hickory	2	3	0
Missouri	Holt	2	3	1
Missouri	Howard	2	3	0
Missouri	Howell	2	3	0
Missouri	Iron	2	3	0
Missouri	Jackson	148	193	117
Missouri	Jasper	2	3	1
Missouri	Jefferson	9	12	7
Missouri	Johnson	2	3	0
Missouri	Knox	2	3	1
Missouri	Laclede	6	8	4
Missouri	Lafayette	4	6	3
Missouri	Lawrence	2	3	0
Missouri	Lewis	2	3	0
Missouri	Lincoln	2	3	0
Missouri	Linn	2	3	0
Missouri	Livingston	2	3	1
Missouri	Macon	2	3	0
Missouri	Madison	2	3	0
Missouri	Maries	2	3	0
Missouri	Marion	2	3	1
Missouri	McDonald	12	16	9
Missouri	Mercer	2	3	0
Missouri	Miller	2	3	0
Missouri	Mississippi	2	3	0
Missouri	Moniteau	2	3	0
Missouri	Monroe	2	3	0
Missouri	Montgomery	3	4	2
Missouri	Morgan	2	3	0
Missouri	New Madrid	2	3	0
Missouri	Newton	2	3	0
Missouri	Nodaway	2	3	0
Missouri	Oregon	2	3	0
Missouri	Osage	2	3	1
Missouri	Ozark	2	3	0
Missouri	Pemiscot	2	3	1
Missouri	Perry	2	3	0
Missouri	Pettis	2	3	0
Missouri	Phelps	2	3	0
Missouri	Pike	2	3	0
Missouri	Platte	12	16	9
Missouri	Polk	2	3	1
Missouri	Pulaski	2	3	1
Missouri	Putnam	2	3	0
Missouri	Ralls	2	3	0
Missouri	Randolph	2	3	0
Missouri	Ray	2	3	0
Missouri	Reynolds	2	3	0
Missouri	Ripley	2	3	1
Missouri	Saline	2	3	0
Missouri	Schuyler	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Missouri	Scotland	4	6	3
Missouri	Scott	2	3	1
Missouri	Shannon	2	3	0
Missouri	Shelby	2	3	0
Missouri	St. Charles	9	12	7
Missouri	St. Clair	2	3	0
Missouri	St. Francois	3	4	2
Missouri	St. Louis	80	105	63
Missouri	St. Louis City	46	60	36
Missouri	Ste. Genevieve	2	3	1
Missouri	Stoddard	2	3	0
Missouri	Stone	2	3	0
Missouri	Sullivan	2	3	0
Missouri	Taney	2	3	0
Missouri	Texas	2	3	0
Missouri	Vernon	2	3	0
Missouri	Warren	2	3	0
Missouri	Washington	2	3	1
Missouri	Wayne	2	3	0
Missouri	Webster	2	3	0
Missouri	Worth	2	3	0
Missouri	Wright	2	3	0
Montana	Beaverhead	2	3	0
Montana	Big Horn	2	3	0
Montana	Blaine	2	3	0
Montana	Broadwater	2	3	0
Montana	Carbon	2	3	0
Montana	Carter	2	3	0
Montana	Cascade	2	3	0
Montana	Chouteau	2	3	0
Montana	Custer	8	11	6
Montana	Daniels	2	3	0
Montana	Dawson	2	3	0
Montana	Deer Lodge	2	3	0
Montana	Fallon	2	3	0
Montana	Fergus	4	6	3
Montana	Flathead	41	54	32
Montana	Gallatin	13	17	10
Montana	Garfield	2	3	0
Montana	Glacier	2	3	0
Montana	Golden Valley	2	3	0
Montana	Granite	2	3	0
Montana	Hill	2	3	0
Montana	Jefferson	2	3	0
Montana	Judith Basin	3	4	2
Montana	Lake	3	4	2
Montana	Lewis and Clark	21	28	16
Montana	Liberty	2	3	0
Montana	Lincoln	4	6	3
Montana	Madison	2	3	0
Montana	McCone	2	3	0
Montana	Meagher	2	3	0
Montana	Mineral	2	3	0
Montana	Missoula	11	15	8
Montana	Musselshell	2	3	0
Montana	Park	2	3	0
Montana	Petroleum	2	3	0
Montana	Phillips	2	3	0
Montana	Pondera	2	3	0
Montana	Powder River	2	3	0
Montana	Powell	2	3	0
Montana	Prairie	2	3	0
Montana	Ravalli	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Montana	Richland	2	3	0
Montana	Roosevelt	2	3	0
Montana	Rosebud	2	3	0
Montana	Sanders	2	3	0
Montana	Sheridan	2	3	0
Montana	Silver Bow	8	11	6
Montana	Stillwater	2	3	0
Montana	Sweet Grass	2	3	0
Montana	Teton	2	3	0
Montana	Toole	2	3	0
Montana	Treasure	2	3	0
Montana	Valley	2	3	0
Montana	Wheatland	2	3	0
Montana	Wibaux	2	3	0
Montana	Yellowstone	3	4	2
Montana	Yellowstone National Park	2	3	0
Nebraska	Adams	2	3	1
Nebraska	Antelope	2	3	0
Nebraska	Arthur	2	3	0
Nebraska	Banner	2	3	0
Nebraska	Blaine	2	3	0
Nebraska	Boone	2	3	0
Nebraska	Box Butte	2	3	0
Nebraska	Boyd	2	3	0
Nebraska	Brown	2	3	0
Nebraska	Buffalo	6	8	4
Nebraska	Burt	2	3	0
Nebraska	Butler	2	3	1
Nebraska	Cass	2	3	1
Nebraska	Cedar	6	8	4
Nebraska	Chase	2	3	0
Nebraska	Cherry	2	3	0
Nebraska	Cheyenne	2	3	0
Nebraska	Clay	2	3	1
Nebraska	Colfax	2	3	0
Nebraska	Cuming	2	3	1
Nebraska	Custer	2	3	0
Nebraska	Dakota	2	3	0
Nebraska	Dawes	2	3	0
Nebraska	Dawson	2	3	0
Nebraska	Deuel	2	3	0
Nebraska	Dixon	2	3	0
Nebraska	Dodge	2	3	1
Nebraska	Douglas	66	86	52
Nebraska	Dundy	2	3	0
Nebraska	Fillmore	2	3	0
Nebraska	Franklin	2	3	0
Nebraska	Frontier	2	3	0
Nebraska	Furnas	2	3	0
Nebraska	Gage	16	21	12
Nebraska	Garden	2	3	0
Nebraska	Garfield	2	3	0
Nebraska	Gosper	2	3	0
Nebraska	Grant	2	3	0
Nebraska	Greeley	2	3	0
Nebraska	Hall	13	17	10
Nebraska	Hamilton	24	32	19
Nebraska	Harlan	2	3	0
Nebraska	Hayes	2	3	0
Nebraska	Hitchcock	2	3	0
Nebraska	Holt	2	3	0
Nebraska	Hooker	2	3	0
Nebraska	Howard	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Nebraska	Jefferson	2	3	0
Nebraska	Johnson	2	3	0
Nebraska	Kearney	2	3	0
Nebraska	Keith	2	3	0
Nebraska	Keya Paha	2	3	0
Nebraska	Kimball	2	3	0
Nebraska	Knox	2	3	0
Nebraska	Lancaster	18	24	14
Nebraska	Lincoln	2	3	0
Nebraska	Logan	2	3	0
Nebraska	Loup	2	3	0
Nebraska	Madison	2	3	0
Nebraska	McPherson	2	3	0
Nebraska	Merrick	2	3	0
Nebraska	Morrill	4	6	3
Nebraska	Nance	2	3	0
Nebraska	Nemaha	2	3	0
Nebraska	Nuckolls	2	3	0
Nebraska	Otoe	2	3	0
Nebraska	Pawnee	2	3	0
Nebraska	Perkins	2	3	0
Nebraska	Phelps	2	3	0
Nebraska	Pierce	3	4	2
Nebraska	Platte	8	11	6
Nebraska	Polk	11	15	8
Nebraska	Red Willow	2	3	0
Nebraska	Richardson	3	4	2
Nebraska	Rock	2	3	0
Nebraska	Saline	6	8	4
Nebraska	Sarpy	9	12	7
Nebraska	Saunders	2	3	0
Nebraska	Scotts Bluff	4	6	3
Nebraska	Seward	3	4	2
Nebraska	Sheridan	2	3	1
Nebraska	Sherman	2	3	0
Nebraska	Sioux	2	3	0
Nebraska	Stanton	2	3	0
Nebraska	Thayer	2	3	0
Nebraska	Thomas	2	3	0
Nebraska	Thurston	2	3	0
Nebraska	Valley	2	3	0
Nebraska	Washington	2	3	0
Nebraska	Wayne	2	3	0
Nebraska	Webster	2	3	0
Nebraska	Wheeler	2	3	0
Nebraska	York	22	29	17
Nevada	Carson City	18	24	14
Nevada	Churchill	3	4	2
Nevada	Clark	422	550	335
Nevada	Douglas	8	11	6
Nevada	Elko	2	3	0
Nevada	Esmeralda	2	3	0
Nevada	Eureka	2	3	0
Nevada	Humboldt	2	3	0
Nevada	Lander	2	3	1
Nevada	Lincoln	2	3	0
Nevada	Lyon	2	3	0
Nevada	Mineral	2	3	0
Nevada	Nye	2	3	1
Nevada	Pershing	6	8	4
Nevada	Storey	2	3	0
Nevada	Washoe	46	60	36
Nevada	White Pine	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
New Hampshire	Belknap	9	12	7
New Hampshire	Carroll	2	3	0
New Hampshire	Cheshire	9	12	7
New Hampshire	Coos	2	3	0
New Hampshire	Grafton	3	4	2
New Hampshire	Hillsborough	9	12	7
New Hampshire	Merrimack	18	24	14
New Hampshire	Rockingham	28	37	22
New Hampshire	Strafford	2	3	0
New Hampshire	Sullivan	2	3	1
New Jersey	Atlantic	36	47	28
New Jersey	Bergen	118	154	93
New Jersey	Burlington	28	37	22
New Jersey	Camden	45	59	35
New Jersey	Cape May	11	15	8
New Jersey	Cumberland	12	16	9
New Jersey	Essex	116	152	92
New Jersey	Gloucester	12	16	9
New Jersey	Hudson	56	73	44
New Jersey	Hunterdon	2	3	1
New Jersey	Mercer	24	32	19
New Jersey	Middlesex	47	62	37
New Jersey	Monmouth	32	42	25
New Jersey	Morris	41	54	32
New Jersey	Ocean	29	38	23
New Jersey	Passaic	42	55	33
New Jersey	Salem	2	3	0
New Jersey	Somerset	8	11	6
New Jersey	Sussex	6	8	4
New Jersey	Union	50	66	39
New Jersey	Warren	2	3	1
New Mexico	Bernalillo	61	80	48
New Mexico	Catron	2	3	0
New Mexico	Chaves	4	6	3
New Mexico	Cibola	6	8	4
New Mexico	Colfax	2	3	0
New Mexico	Curry	2	3	0
New Mexico	DeBaca	2	3	0
New Mexico	Dona Ana	22	29	17
New Mexico	Eddy	7	10	5
New Mexico	Grant	2	3	0
New Mexico	Guadalupe	2	3	0
New Mexico	Harding	2	3	0
New Mexico	Hidalgo	4	6	3
New Mexico	Lea	2	3	0
New Mexico	Lincoln	2	3	1
New Mexico	Los Alamos	2	3	0
New Mexico	Luna	8	11	6
New Mexico	McKinley	2	3	0
New Mexico	Mora	2	3	0
New Mexico	Otero	4	6	3
New Mexico	Quay	2	3	0
New Mexico	Rio Arriba	2	3	0
New Mexico	Roosevelt	3	4	2
New Mexico	San Juan	12	16	9
New Mexico	San Miguel	2	3	0
New Mexico	Sandoval	3	4	2
New Mexico	Santa Fe	6	8	4
New Mexico	Sierra	2	3	0
New Mexico	Socorro	2	3	0
New Mexico	Taos	4	6	3
New Mexico	Torrance	2	3	0
New Mexico	Union	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
New Mexico	Valencia	3	4	2
New York	Albany	43	57	34
New York	Allegany	2	3	1
New York	Bronx	136	178	108
New York	Broome	42	55	33
New York	Cattaraugus	3	4	2
New York	Cayuga	13	17	10
New York	Chautauqua	2	3	1
New York	Chemung	2	3	1
New York	Chenango	3	4	2
New York	Clinton	6	8	4
New York	Columbia	4	6	3
New York	Cortland	2	3	0
New York	Delaware	19	25	15
New York	Dutchess	12	16	9
New York	Erie	92	120	73
New York	Essex	2	3	0
New York	Franklin	3	4	2
New York	Fulton	2	3	1
New York	Genesee	17	23	13
New York	Greene	3	4	2
New York	Hamilton	4	6	3
New York	Herkimer	2	3	0
New York	Jefferson	8	11	6
New York	Kings	220	287	174
New York	Lewis	2	3	0
New York	Livingston	3	4	2
New York	Madison	4	6	3
New York	Monroe	128	167	101
New York	Montgomery	2	3	1
New York	Nassau	154	201	122
New York	New York	401	523	318
New York	Niagara	16	21	12
New York	Oneida	41	54	32
New York	Onondaga	56	73	44
New York	Ontario	8	11	6
New York	Orange	27	36	21
New York	Orleans	2	3	0
New York	Oswego	17	23	13
New York	Otsego	6	8	4
New York	Putnam	12	16	9
New York	Queens	333	434	264
New York	Rensselaer	13	17	10
New York	Richmond	47	62	37
New York	Rockland	45	59	35
New York	Saratoga	7	10	5
New York	Schenectady	8	11	6
New York	Schoharie	3	4	2
New York	Schuyler	19	25	15
New York	Seneca	2	3	0
New York	St. Lawrence	4	6	3
New York	Steuben	8	11	6
New York	Suffolk	114	149	90
New York	Sullivan	4	6	3
New York	Tioga	3	4	2
New York	Tompkins	4	6	3
New York	Ulster	21	28	16
New York	Warren	7	10	5
New York	Washington	4	6	3
New York	Wayne	8	11	6
New York	Westchester	126	165	100
New York	Wyoming	2	3	1
New York	Yates	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
North Carolina	Alamance	4	6	3
North Carolina	Alexander	2	3	0
North Carolina	Alleghany	12	16	9
North Carolina	Anson	3	4	2
North Carolina	Ashe	2	3	0
North Carolina	Avery	2	3	0
North Carolina	Beaufort	2	3	0
North Carolina	Bertie	2	3	0
North Carolina	Bladen	2	3	0
North Carolina	Brunswick	11	15	8
North Carolina	Buncombe	11	15	8
North Carolina	Burke	2	3	1
North Carolina	Cabarrus	8	11	6
North Carolina	Caldwell	2	3	0
North Carolina	Camden	2	3	0
North Carolina	Carteret	2	3	0
North Carolina	Caswell	3	4	2
North Carolina	Catawba	2	3	1
North Carolina	Chatham	2	3	0
North Carolina	Cherokee	2	3	0
North Carolina	Chowan	2	3	0
North Carolina	Clay	2	3	0
North Carolina	Cleveland	4	6	3
North Carolina	Columbus	6	8	4
North Carolina	Craven	2	3	0
North Carolina	Cumberland	11	15	8
North Carolina	Currituck	2	3	0
North Carolina	Dare	2	3	1
North Carolina	Davidson	13	17	10
North Carolina	Davie	2	3	0
North Carolina	Duplin	2	3	0
North Carolina	Durham	6	8	4
North Carolina	Edgecombe	2	3	0
North Carolina	Forsyth	41	54	32
North Carolina	Franklin	2	3	1
North Carolina	Gaston	4	6	3
North Carolina	Gates	2	3	0
North Carolina	Graham	2	3	0
North Carolina	Granville	11	15	8
North Carolina	Greene	2	3	0
North Carolina	Guilford	14	19	11
North Carolina	Halifax	4	6	3
North Carolina	Harnett	2	3	0
North Carolina	Haywood	2	3	0
North Carolina	Henderson	8	11	6
North Carolina	Hertford	6	8	4
North Carolina	Hoke	2	3	0
North Carolina	Hyde	2	3	0
North Carolina	Iredell	6	8	4
North Carolina	Jackson	7	10	5
North Carolina	Johnston	2	3	0
North Carolina	Jones	2	3	0
North Carolina	Lee	2	3	0
North Carolina	Lenoir	6	8	4
North Carolina	Lincoln	2	3	0
North Carolina	Macon	6	8	4
North Carolina	Madison	2	3	0
North Carolina	Martin	2	3	0
North Carolina	McDowell	2	3	0
North Carolina	Mecklenburg	13	17	10
North Carolina	Mitchell	2	3	1
North Carolina	Montgomery	4	6	3
North Carolina	Moore	11	15	8

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
North Carolina	Nash	7	10	5
North Carolina	New Hanover	3	4	2
North Carolina	Northampton	4	6	3
North Carolina	Onslow	2	3	1
North Carolina	Orange	2	3	0
North Carolina	Pamlico	2	3	0
North Carolina	Pasquotank	2	3	0
North Carolina	Pender	2	3	0
North Carolina	Perquimans	2	3	0
North Carolina	Person	2	3	0
North Carolina	Pitt	31	41	24
North Carolina	Polk	2	3	0
North Carolina	Randolph	29	38	23
North Carolina	Richmond	2	3	0
North Carolina	Robeson	2	3	0
North Carolina	Rockingham	2	3	0
North Carolina	Rowan	9	12	7
North Carolina	Rutherford	2	3	1
North Carolina	Sampson	2	3	0
North Carolina	Scotland	2	3	0
North Carolina	Stanly	2	3	0
North Carolina	Stokes	2	3	0
North Carolina	Surry	3	4	2
North Carolina	Swain	2	3	0
North Carolina	Transylvania	13	17	10
North Carolina	Tyrrell	2	3	0
North Carolina	Union	2	3	0
North Carolina	Vance	3	4	2
North Carolina	Wake	22	29	17
North Carolina	Warren	2	3	0
North Carolina	Washington	2	3	0
North Carolina	Watauga	2	3	0
North Carolina	Wayne	2	3	1
North Carolina	Wilkes	2	3	0
North Carolina	Wilson	2	3	0
North Carolina	Yadkin	2	3	0
North Carolina	Yancey	2	3	0
North Dakota	Adams	2	3	0
North Dakota	Barnes	2	3	0
North Dakota	Benson	2	3	0
North Dakota	Billings	2	3	0
North Dakota	Bottineau	2	3	0
North Dakota	Bowman	2	3	0
North Dakota	Burke	2	3	0
North Dakota	Burleigh	6	8	4
North Dakota	Cass	14	19	11
North Dakota	Cavalier	2	3	0
North Dakota	Dickey	2	3	0
North Dakota	Divide	2	3	0
North Dakota	Dunn	2	3	0
North Dakota	Eddy	2	3	0
North Dakota	Emmons	2	3	0
North Dakota	Foster	2	3	0
North Dakota	Golden Valley	2	3	0
North Dakota	Grand Forks	3	4	2
North Dakota	Grant	2	3	0
North Dakota	Griggs	2	3	0
North Dakota	Hettinger	2	3	0
North Dakota	Kidder	2	3	0
North Dakota	LaMoure	3	4	2
North Dakota	Logan	2	3	0
North Dakota	McHenry	2	3	0
North Dakota	McIntosh	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
North Dakota	McKenzie	7	10	5
North Dakota	McLean	2	3	1
North Dakota	Mercer	2	3	0
North Dakota	Morton	2	3	0
North Dakota	Mountrail	8	11	6
North Dakota	Nelson	2	3	0
North Dakota	Oliver	2	3	0
North Dakota	Pembina	2	3	0
North Dakota	Pierce	2	3	0
North Dakota	Ramsey	2	3	0
North Dakota	Ransom	2	3	0
North Dakota	Renville	3	4	2
North Dakota	Richland	2	3	0
North Dakota	Rolette	14	19	11
North Dakota	Sargent	2	3	0
North Dakota	Sheridan	2	3	0
North Dakota	Sioux	2	3	0
North Dakota	Slope	2	3	0
North Dakota	Stark	2	3	0
North Dakota	Steele	2	3	1
North Dakota	Stutsman	3	4	2
North Dakota	Towner	2	3	0
North Dakota	Traill	2	3	1
North Dakota	Walsh	2	3	0
North Dakota	Ward	8	11	6
North Dakota	Wells	2	3	0
North Dakota	Williams	2	3	0
Ohio	Adams	2	3	0
Ohio	Allen	12	16	9
Ohio	Ashland	2	3	0
Ohio	Ashtabula	2	3	1
Ohio	Athens	2	3	0
Ohio	Auglaize	2	3	0
Ohio	Belmont	2	3	0
Ohio	Brown	2	3	0
Ohio	Butler	4	6	3
Ohio	Carroll	2	3	1
Ohio	Champaign	2	3	0
Ohio	Clark	2	3	0
Ohio	Clermont	3	4	2
Ohio	Clinton	2	3	0
Ohio	Columbiana	3	4	2
Ohio	Coshocton	2	3	0
Ohio	Crawford	2	3	0
Ohio	Cuyahoga	168	219	133
Ohio	Darke	2	3	0
Ohio	Defiance	3	4	2
Ohio	Delaware	2	3	1
Ohio	Erie	2	3	0
Ohio	Fairfield	2	3	1
Ohio	Fayette	2	3	0
Ohio	Franklin	29	38	23
Ohio	Fulton	2	3	0
Ohio	Gallia	2	3	0
Ohio	Geauga	9	12	7
Ohio	Greene	6	8	4
Ohio	Guernsey	2	3	0
Ohio	Hamilton	50	66	39
Ohio	Hancock	3	4	2
Ohio	Hardin	2	3	0
Ohio	Harrison	2	3	0
Ohio	Henry	2	3	0
Ohio	Highland	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Ohio	Hocking	2	3	0
Ohio	Holmes	2	3	0
Ohio	Huron	2	3	0
Ohio	Jackson	2	3	0
Ohio	Jefferson	2	3	0
Ohio	Knox	2	3	1
Ohio	Lake	13	17	10
Ohio	Lawrence	2	3	0
Ohio	Licking	7	10	5
Ohio	Logan	2	3	1
Ohio	Lorain	2	3	1
Ohio	Lucas	53	70	42
Ohio	Madison	2	3	0
Ohio	Mahoning	24	32	19
Ohio	Marion	4	6	3
Ohio	Medina	3	4	2
Ohio	Meigs	2	3	0
Ohio	Mercer	2	3	0
Ohio	Miami	2	3	0
Ohio	Monroe	2	3	0
Ohio	Montgomery	29	38	23
Ohio	Morgan	2	3	1
Ohio	Morrow	2	3	0
Ohio	Muskingum	2	3	0
Ohio	Noble	2	3	0
Ohio	Ottawa	2	3	0
Ohio	Paulding	2	3	1
Ohio	Perry	2	3	0
Ohio	Pickaway	2	3	0
Ohio	Pike	2	3	0
Ohio	Portage	16	21	12
Ohio	Preble	4	6	3
Ohio	Putnam	2	3	0
Ohio	Richland	2	3	0
Ohio	Ross	2	3	0
Ohio	Sandusky	2	3	0
Ohio	Scioto	2	3	0
Ohio	Seneca	2	3	0
Ohio	Shelby	2	3	0
Ohio	Stark	7	10	5
Ohio	Summit	40	53	31
Ohio	Trumbull	2	3	0
Ohio	Tuscarawas	4	6	3
Ohio	Union	2	3	0
Ohio	Van Wert	2	3	0
Ohio	Vinton	2	3	0
Ohio	Warren	7	10	5
Ohio	Washington	2	3	1
Ohio	Wayne	9	12	7
Ohio	Williams	2	3	0
Ohio	Wood	2	3	0
Ohio	Wyandot	2	3	0
Oklahoma	Adair	2	3	0
Oklahoma	Alfalfa	2	3	1
Oklahoma	Atoka	6	8	4
Oklahoma	Beaver	2	3	1
Oklahoma	Beckham	2	3	0
Oklahoma	Blaine	2	3	1
Oklahoma	Bryan	2	3	0
Oklahoma	Caddo	9	12	7
Oklahoma	Canadian	8	11	6
Oklahoma	Carter	2	3	0
Oklahoma	Cherokee	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Oklahoma	Choctaw	2	3	1
Oklahoma	Cimarron	2	3	0
Oklahoma	Cleveland	19	25	15
Oklahoma	Coal	2	3	0
Oklahoma	Comanche	19	25	15
Oklahoma	Cotton	2	3	0
Oklahoma	Craig	2	3	0
Oklahoma	Creek	7	10	5
Oklahoma	Custer	2	3	0
Oklahoma	Delaware	2	3	0
Oklahoma	Dewey	2	3	0
Oklahoma	Ellis	2	3	0
Oklahoma	Garfield	2	3	0
Oklahoma	Garvin	3	4	2
Oklahoma	Grady	7	10	5
Oklahoma	Grant	2	3	0
Oklahoma	Greer	2	3	1
Oklahoma	Harmon	2	3	0
Oklahoma	Harper	2	3	0
Oklahoma	Haskell	2	3	0
Oklahoma	Hughes	2	3	0
Oklahoma	Jackson	2	3	0
Oklahoma	Jefferson	2	3	0
Oklahoma	Johnston	2	3	0
Oklahoma	Kay	2	3	1
Oklahoma	Kingfisher	2	3	0
Oklahoma	Kiowa	2	3	1
Oklahoma	Latimer	2	3	0
Oklahoma	Le Flore	2	3	0
Oklahoma	Lincoln	3	4	2
Oklahoma	Logan	2	3	0
Oklahoma	Love	2	3	0
Oklahoma	Major	2	3	0
Oklahoma	Marshall	2	3	0
Oklahoma	Mayes	6	8	4
Oklahoma	McClain	6	8	4
Oklahoma	McCurtain	2	3	0
Oklahoma	McIntosh	2	3	0
Oklahoma	Murray	2	3	0
Oklahoma	Muskogee	2	3	0
Oklahoma	Noble	2	3	0
Oklahoma	Nowata	2	3	1
Oklahoma	Okfuskee	2	3	0
Oklahoma	Oklahoma	108	141	85
Oklahoma	Okmulgee	2	3	1
Oklahoma	Osage	2	3	0
Oklahoma	Ottawa	2	3	0
Oklahoma	Pawnee	2	3	0
Oklahoma	Payne	2	3	0
Oklahoma	Pittsburg	2	3	0
Oklahoma	Pontotoc	2	3	0
Oklahoma	Pottawatomie	4	6	3
Oklahoma	Pushmataha	2	3	1
Oklahoma	Roger Mills	2	3	0
Oklahoma	Rogers	6	8	4
Oklahoma	Seminole	2	3	0
Oklahoma	Sequoyah	2	3	0
Oklahoma	Stephens	9	12	7
Oklahoma	Texas	2	3	0
Oklahoma	Tillman	2	3	0
Oklahoma	Tulsa	21	28	16
Oklahoma	Wagoner	2	3	0
Oklahoma	Washington	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Oklahoma	Washita	2	3	0
Oklahoma	Woods	2	3	0
Oklahoma	Woodward	2	3	1
Oregon	Baker	3	4	2
Oregon	Benton	7	10	5
Oregon	Clackamas	27	36	21
Oregon	Clatsop	8	11	6
Oregon	Columbia	3	4	2
Oregon	Coos	8	11	6
Oregon	Crook	2	3	0
Oregon	Curry	2	3	1
Oregon	Deschutes	6	8	4
Oregon	Douglas	2	3	0
Oregon	Gilliam	2	3	0
Oregon	Grant	2	3	0
Oregon	Harney	3	4	2
Oregon	Hood River	3	4	2
Oregon	Jackson	12	16	9
Oregon	Jefferson	6	8	4
Oregon	Josephine	2	3	1
Oregon	Klamath	6	8	4
Oregon	Lake	2	3	0
Oregon	Lane	26	34	20
Oregon	Lincoln	6	8	4
Oregon	Linn	2	3	0
Oregon	Malheur	2	3	0
Oregon	Marion	38	50	30
Oregon	Morrow	2	3	0
Oregon	Multnomah	105	137	83
Oregon	Polk	2	3	1
Oregon	Sherman	2	3	0
Oregon	Tillamook	2	3	1
Oregon	Umatilla	2	3	1
Oregon	Union	2	3	0
Oregon	Wallowa	4	6	3
Oregon	Wasco	3	4	2
Oregon	Washington	27	36	21
Oregon	Wheeler	2	3	0
Oregon	Yamhill	7	10	5
Pennsylvania	Adams	11	15	8
Pennsylvania	Allegheny	183	239	145
Pennsylvania	Armstrong	6	8	4
Pennsylvania	Beaver	7	10	5
Pennsylvania	Bedford	2	3	1
Pennsylvania	Berks	40	53	31
Pennsylvania	Blair	16	21	12
Pennsylvania	Bradford	19	25	15
Pennsylvania	Bucks	36	47	28
Pennsylvania	Butler	11	15	8
Pennsylvania	Cambria	18	24	14
Pennsylvania	Cameron	2	3	0
Pennsylvania	Carbon	7	10	5
Pennsylvania	Centre	11	15	8
Pennsylvania	Chester	21	28	16
Pennsylvania	Clarion	2	3	0
Pennsylvania	Clearfield	2	3	0
Pennsylvania	Clinton	2	3	0
Pennsylvania	Columbia	2	3	0
Pennsylvania	Crawford	4	6	3
Pennsylvania	Cumberland	7	10	5
Pennsylvania	Dauphin	22	29	17
Pennsylvania	Delaware	27	36	21
Pennsylvania	Elk	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Pennsylvania	Erie	8	11	6
Pennsylvania	Fayette	2	3	1
Pennsylvania	Forest	2	3	1
Pennsylvania	Franklin	2	3	0
Pennsylvania	Fulton	2	3	0
Pennsylvania	Greene	2	3	1
Pennsylvania	Huntingdon	6	8	4
Pennsylvania	Indiana	2	3	1
Pennsylvania	Jefferson	2	3	0
Pennsylvania	Juniata	2	3	0
Pennsylvania	Lackawanna	11	15	8
Pennsylvania	Lancaster	19	25	15
Pennsylvania	Lawrence	21	28	16
Pennsylvania	Lebanon	2	3	1
Pennsylvania	Lehigh	27	36	21
Pennsylvania	Luzerne	34	45	27
Pennsylvania	Lycoming	4	6	3
Pennsylvania	McKean	2	3	0
Pennsylvania	Mercer	3	4	2
Pennsylvania	Mifflin	2	3	0
Pennsylvania	Monroe	21	28	16
Pennsylvania	Montgomery	79	103	62
Pennsylvania	Montour	2	3	0
Pennsylvania	Northampton	21	28	16
Pennsylvania	Northumberland	2	3	1
Pennsylvania	Perry	8	11	6
Pennsylvania	Philadelphia	240	313	190
Pennsylvania	Pike	2	3	0
Pennsylvania	Potter	3	4	2
Pennsylvania	Schuylkill	4	6	3
Pennsylvania	Snyder	3	4	2
Pennsylvania	Somerset	8	11	6
Pennsylvania	Sullivan	2	3	0
Pennsylvania	Susquehanna	6	8	4
Pennsylvania	Tioga	18	24	14
Pennsylvania	Union	2	3	0
Pennsylvania	Venango	2	3	0
Pennsylvania	Warren	2	3	1
Pennsylvania	Washington	2	3	1
Pennsylvania	Wayne	11	15	8
Pennsylvania	Westmoreland	8	11	6
Pennsylvania	Wyoming	2	3	0
Pennsylvania	York	19	25	15
Puerto Rico	Puerto Rico	89	116	70
Rhode Island	Bristol	2	3	0
Rhode Island	Kent	9	12	7
Rhode Island	Newport	2	3	1
Rhode Island	Providence	66	86	52
Rhode Island	Washington	3	4	2
South Carolina	Abbeville	17	23	13
South Carolina	Aiken	2	3	1
South Carolina	Allendale	2	3	0
South Carolina	Anderson	17	23	13
South Carolina	Bamberg	3	4	2
South Carolina	Barnwell	6	8	4
South Carolina	Beaufort	3	4	2
South Carolina	Berkeley	2	3	1
South Carolina	Calhoun	2	3	0
South Carolina	Charleston	29	38	23
South Carolina	Cherokee	2	3	0
South Carolina	Chester	2	3	0
South Carolina	Chesterfield	2	3	0
South Carolina	Clarendon	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
South Carolina	Colleton	2	3	1
South Carolina	Darlington	2	3	0
South Carolina	Dillon	2	3	0
South Carolina	Dorchester	4	6	3
South Carolina	Edgefield	2	3	0
South Carolina	Fairfield	2	3	0
South Carolina	Florence	4	6	3
South Carolina	Georgetown	2	3	0
South Carolina	Greenville	12	16	9
South Carolina	Greenwood	2	3	0
South Carolina	Hampton	2	3	0
South Carolina	Horry	2	3	1
South Carolina	Jasper	2	3	1
South Carolina	Kershaw	2	3	1
South Carolina	Lancaster	2	3	0
South Carolina	Laurens	2	3	1
South Carolina	Lee	2	3	0
South Carolina	Lexington	3	4	2
South Carolina	Marion	2	3	0
South Carolina	Marlboro	2	3	1
South Carolina	McCormick	11	15	8
South Carolina	Newberry	2	3	0
South Carolina	Oconee	3	4	2
South Carolina	Orangeburg	2	3	0
South Carolina	Pickens	2	3	1
South Carolina	Richland	26	34	20
South Carolina	Saluda	2	3	0
South Carolina	Spartanburg	7	10	5
South Carolina	Sumter	2	3	0
South Carolina	Union	8	11	6
South Carolina	Williamsburg	2	3	1
South Carolina	York	4	6	3
South Dakota	Aurora	3	4	2
South Dakota	Beadle	3	4	2
South Dakota	Bennett	2	3	0
South Dakota	Bon Homme	2	3	0
South Dakota	Brookings	6	8	4
South Dakota	Brown	2	3	1
South Dakota	Brule	2	3	0
South Dakota	Buffalo	2	3	0
South Dakota	Butte	2	3	0
South Dakota	Campbell	2	3	0
South Dakota	Charles Mix	2	3	0
South Dakota	Clark	2	3	0
South Dakota	Clay	2	3	0
South Dakota	Codington	2	3	0
South Dakota	Corson	2	3	0
South Dakota	Custer	2	3	0
South Dakota	Davison	2	3	0
South Dakota	Day	2	3	0
South Dakota	Deuel	2	3	0
South Dakota	Dewey	4	6	3
South Dakota	Douglas	2	3	1
South Dakota	Edmunds	2	3	0
South Dakota	Fall River	2	3	0
South Dakota	Faulk	2	3	0
South Dakota	Grant	2	3	0
South Dakota	Gregory	2	3	0
South Dakota	Haakon	2	3	0
South Dakota	Hamlin	2	3	0
South Dakota	Hand	2	3	0
South Dakota	Hanson	2	3	0
South Dakota	Harding	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
South Dakota	Hughes	2	3	0
South Dakota	Hutchinson	2	3	0
South Dakota	Hyde	2	3	0
South Dakota	Jackson	2	3	0
South Dakota	Jerauld	2	3	0
South Dakota	Jones	2	3	0
South Dakota	Kingsbury	2	3	0
South Dakota	Lake	2	3	0
South Dakota	Lawrence	2	3	0
South Dakota	Lincoln	2	3	0
South Dakota	Lyman	2	3	0
South Dakota	Marshall	2	3	0
South Dakota	McCook	2	3	0
South Dakota	McPherson	2	3	0
South Dakota	Meade	2	3	0
South Dakota	Mellette	2	3	0
South Dakota	Miner	2	3	0
South Dakota	Minnehaha	13	17	10
South Dakota	Moody	2	3	0
South Dakota	Pennington	7	10	5
South Dakota	Perkins	2	3	0
South Dakota	Potter	2	3	0
South Dakota	Roberts	2	3	0
South Dakota	Sanborn	2	3	0
South Dakota	Shannon	2	3	0
South Dakota	Spink	2	3	0
South Dakota	Stanley	2	3	0
South Dakota	Sully	2	3	0
South Dakota	Todd	2	3	0
South Dakota	Tripp	2	3	0
South Dakota	Turner	2	3	0
South Dakota	Union	2	3	0
South Dakota	Walworth	2	3	0
South Dakota	Yankton	2	3	0
South Dakota	Ziebach	3	4	2
Tennessee	Anderson	2	3	0
Tennessee	Bedford	6	8	4
Tennessee	Benton	9	12	7
Tennessee	Bledsoe	2	3	0
Tennessee	Blount	12	16	9
Tennessee	Bradley	6	8	4
Tennessee	Campbell	3	4	2
Tennessee	Cannon	2	3	0
Tennessee	Carroll	3	4	2
Tennessee	Carter	2	3	0
Tennessee	Cheatham	2	3	0
Tennessee	Chester	2	3	0
Tennessee	Claiborne	2	3	0
Tennessee	Clay	2	3	0
Tennessee	Cocke	4	6	3
Tennessee	Coffee	3	4	2
Tennessee	Crockett	2	3	0
Tennessee	Cumberland	2	3	0
Tennessee	Davidson	41	54	32
Tennessee	Decatur	2	3	0
Tennessee	DeKalb	2	3	0
Tennessee	Dickson	2	3	0
Tennessee	Dyer	2	3	0
Tennessee	Fayette	2	3	0
Tennessee	Fentress	2	3	0
Tennessee	Franklin	2	3	0
Tennessee	Gibson	4	6	3
Tennessee	Giles	2	3	1

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Tennessee	Grainger	2	3	0
Tennessee	Greene	7	10	5
Tennessee	Grundy	6	8	4
Tennessee	Hamblen	2	3	0
Tennessee	Hamilton	38	50	30
Tennessee	Hancock	2	3	0
Tennessee	Hardeman	2	3	0
Tennessee	Hardin	11	15	8
Tennessee	Hawkins	11	15	8
Tennessee	Haywood	2	3	0
Tennessee	Henderson	2	3	0
Tennessee	Henry	2	3	0
Tennessee	Hickman	2	3	0
Tennessee	Houston	2	3	0
Tennessee	Humphreys	2	3	0
Tennessee	Jackson	2	3	0
Tennessee	Jefferson	4	6	3
Tennessee	Johnson	2	3	0
Tennessee	Knox	53	70	42
Tennessee	Lake	2	3	0
Tennessee	Lauderdale	2	3	0
Tennessee	Lawrence	2	3	1
Tennessee	Lewis	2	3	0
Tennessee	Lincoln	2	3	0
Tennessee	Loudon	7	10	5
Tennessee	Macon	3	4	2
Tennessee	Madison	2	3	0
Tennessee	Marion	4	6	3
Tennessee	Marshall	3	4	2
Tennessee	Maury	2	3	0
Tennessee	McMinn	3	4	2
Tennessee	McNairy	2	3	0
Tennessee	Meigs	3	4	2
Tennessee	Monroe	2	3	0
Tennessee	Montgomery	2	3	0
Tennessee	Moore	2	3	0
Tennessee	Morgan	2	3	0
Tennessee	Obion	2	3	0
Tennessee	Overton	2	3	0
Tennessee	Perry	2	3	0
Tennessee	Pickett	2	3	0
Tennessee	Polk	2	3	1
Tennessee	Putnam	2	3	0
Tennessee	Rhea	2	3	0
Tennessee	Roane	12	16	9
Tennessee	Robertson	3	4	2
Tennessee	Rutherford	2	3	0
Tennessee	Scott	2	3	0
Tennessee	Sequatchie	2	3	0
Tennessee	Sevier	2	3	1
Tennessee	Shelby	23	30	18
Tennessee	Smith	2	3	0
Tennessee	Stewart	2	3	0
Tennessee	Sullivan	13	17	10
Tennessee	Sumner	3	4	2
Tennessee	Tipton	2	3	0
Tennessee	Trousdale	2	3	0
Tennessee	Unicoi	2	3	0
Tennessee	Union	2	3	0
Tennessee	Van Buren	2	3	0
Tennessee	Warren	2	3	0
Tennessee	Washington	2	3	0
Tennessee	Wayne	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Tennessee	Weakley	3	4	2
Tennessee	White	2	3	0
Tennessee	Williamson	3	4	2
Tennessee	Wilson	2	3	0
Texas	Anderson	12	16	9
Texas	Andrews	2	3	0
Texas	Angelina	13	17	10
Texas	Aransas	2	3	0
Texas	Archer	2	3	0
Texas	Armstrong	2	3	0
Texas	Atascosa	2	3	0
Texas	Austin	2	3	0
Texas	Bailey	2	3	0
Texas	Bandera	2	3	0
Texas	Bastrop	2	3	1
Texas	Baylor	2	3	0
Texas	Bee	2	3	0
Texas	Bell	9	12	7
Texas	Bexar	131	171	104
Texas	Blanco	2	3	0
Texas	Borden	2	3	0
Texas	Bosque	2	3	0
Texas	Bowie	22	29	17
Texas	Brazoria	27	36	21
Texas	Brazos	14	19	11
Texas	Brewster	2	3	1
Texas	Briscoe	2	3	0
Texas	Brooks	2	3	0
Texas	Brown	9	12	7
Texas	Burleson	2	3	0
Texas	Burnet	2	3	1
Texas	Caldwell	3	4	2
Texas	Calhoun	2	3	1
Texas	Callahan	2	3	0
Texas	Cameron	37	49	29
Texas	Camp	2	3	0
Texas	Carson	2	3	0
Texas	Cass	2	3	0
Texas	Castro	3	4	2
Texas	Chambers	3	4	2
Texas	Cherokee	6	8	4
Texas	Childress	2	3	0
Texas	Clay	2	3	0
Texas	Cochran	2	3	0
Texas	Coke	2	3	0
Texas	Coleman	2	3	0
Texas	Collin	32	42	25
Texas	Collingsworth	2	3	0
Texas	Colorado	4	6	3
Texas	Comal	2	3	0
Texas	Comanche	2	3	0
Texas	Concho	2	3	0
Texas	Cooke	12	16	9
Texas	Coryell	9	12	7
Texas	Cottle	2	3	0
Texas	Crane	6	8	4
Texas	Crockett	2	3	0
Texas	Crosby	2	3	0
Texas	Culberson	2	3	0
Texas	Dallam	2	3	0
Texas	Dallas	305	398	242
Texas	Dawson	2	3	0
Texas	Deaf Smith	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Texas	Delta	2	3	0
Texas	Denton	28	37	22
Texas	DeWitt	2	3	0
Texas	Dickens	2	3	0
Texas	Dimmit	2	3	0
Texas	Donley	2	3	0
Texas	Duval	2	3	1
Texas	Eastland	11	15	8
Texas	Ector	2	3	1
Texas	Edwards	2	3	0
Texas	El Paso	94	123	74
Texas	Ellis	19	25	15
Texas	Erath	2	3	0
Texas	Falls	2	3	0
Texas	Fannin	3	4	2
Texas	Fayette	2	3	0
Texas	Fisher	2	3	0
Texas	Floyd	2	3	0
Texas	Foard	2	3	0
Texas	Fort Bend	38	50	30
Texas	Franklin	2	3	0
Texas	Freestone	7	10	5
Texas	Frio	2	3	0
Texas	Gaines	2	3	0
Texas	Galveston	21	28	16
Texas	Garza	2	3	0
Texas	Gillespie	2	3	0
Texas	Glasscock	2	3	0
Texas	Goliad	2	3	0
Texas	Gonzales	2	3	0
Texas	Gray	2	3	0
Texas	Grayson	7	10	5
Texas	Gregg	13	17	10
Texas	Grimes	2	3	1
Texas	Guadalupe	2	3	0
Texas	Hale	2	3	0
Texas	Hall	2	3	0
Texas	Hamilton	2	3	0
Texas	Hansford	2	3	0
Texas	Hardeman	2	3	0
Texas	Hardin	2	3	0
Texas	Harris	371	484	294
Texas	Harrison	2	3	1
Texas	Hartley	2	3	0
Texas	Haskell	2	3	0
Texas	Hays	4	6	3
Texas	Hemphill	2	3	0
Texas	Henderson	13	17	10
Texas	Hidalgo	34	45	27
Texas	Hill	2	3	0
Texas	Hockley	3	4	2
Texas	Hood	2	3	1
Texas	Hopkins	2	3	0
Texas	Houston	2	3	0
Texas	Howard	2	3	0
Texas	Hudspeth	2	3	0
Texas	Hunt	7	10	5
Texas	Hutchinson	2	3	0
Texas	Irion	2	3	0
Texas	Jack	2	3	0
Texas	Jackson	2	3	0
Texas	Jasper	2	3	1
Texas	Jeff Davis	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Texas	Jefferson	3	4	2
Texas	Jim Hogg	3	4	2
Texas	Jim Wells	8	11	6
Texas	Johnson	8	11	6
Texas	Jones	2	3	1
Texas	Karnes	2	3	0
Texas	Kaufman	11	15	8
Texas	Kendall	2	3	0
Texas	Kenedy	2	3	0
Texas	Kent	2	3	0
Texas	Kerr	2	3	0
Texas	Kimble	2	3	0
Texas	King	2	3	0
Texas	Kinney	2	3	0
Texas	Kleberg	2	3	0
Texas	Knox	2	3	0
Texas	La Salle	2	3	0
Texas	Lamar	2	3	0
Texas	Lamb	2	3	0
Texas	Lampasas	2	3	0
Texas	Lavaca	2	3	1
Texas	Lee	2	3	0
Texas	Leon	2	3	0
Texas	Liberty	8	11	6
Texas	Limestone	2	3	0
Texas	Lipscomb	2	3	0
Texas	Live Oak	2	3	0
Texas	Llano	2	3	0
Texas	Loving	2	3	0
Texas	Lubbock	21	28	16
Texas	Lynn	2	3	0
Texas	Madison	2	3	0
Texas	Marion	2	3	0
Texas	Martin	2	3	0
Texas	Mason	2	3	0
Texas	Matagorda	2	3	0
Texas	Maverick	22	29	17
Texas	McCulloch	3	4	2
Texas	McLennan	17	23	13
Texas	McMullen	2	3	0
Texas	Medina	2	3	0
Texas	Menard	2	3	0
Texas	Midland	2	3	0
Texas	Milam	2	3	1
Texas	Mills	2	3	0
Texas	Mitchell	2	3	0
Texas	Montague	2	3	0
Texas	Montgomery	36	47	28
Texas	Moore	2	3	0
Texas	Morris	2	3	0
Texas	Motley	2	3	0
Texas	Nacogdoches	7	10	5
Texas	Navarro	4	6	3
Texas	Newton	2	3	0
Texas	Nolan	2	3	0
Texas	Nueces	21	28	16
Texas	Ochiltree	2	3	0
Texas	Oldham	2	3	0
Texas	Orange	3	4	2
Texas	Palo Pinto	2	3	1
Texas	Panola	3	4	2
Texas	Parker	8	11	6
Texas	Parmer	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Texas	Pecos	2	3	1
Texas	Polk	2	3	1
Texas	Potter	7	10	5
Texas	Presidio	4	6	3
Texas	Rains	2	3	0
Texas	Randall	2	3	0
Texas	Reagan	2	3	0
Texas	Real	2	3	0
Texas	Red River	2	3	0
Texas	Reeves	2	3	1
Texas	Refugio	2	3	0
Texas	Roberts	2	3	0
Texas	Robertson	2	3	0
Texas	Rockwall	11	15	8
Texas	Runnels	3	4	2
Texas	Rusk	2	3	0
Texas	Sabine	2	3	0
Texas	San Augustine	2	3	0
Texas	San Jacinto	2	3	0
Texas	San Patricio	2	3	0
Texas	San Saba	2	3	0
Texas	Schleicher	2	3	0
Texas	Scurry	6	8	4
Texas	Shackelford	2	3	0
Texas	Shelby	2	3	0
Texas	Sherman	2	3	0
Texas	Smith	2	3	0
Texas	Somervell	2	3	0
Texas	Starr	33	43	26
Texas	Stephens	2	3	1
Texas	Sterling	2	3	0
Texas	Stonewall	2	3	0
Texas	Sutton	2	3	1
Texas	Swisher	2	3	0
Texas	Tarrant	108	141	85
Texas	Taylor	13	17	10
Texas	Terrell	2	3	0
Texas	Terry	2	3	0
Texas	Throckmorton	2	3	0
Texas	Titus	2	3	0
Texas	Tom Green	3	4	2
Texas	Travis	89	116	70
Texas	Trinity	6	8	4
Texas	Tyler	3	4	2
Texas	Upshur	2	3	0
Texas	Upton	2	3	0
Texas	Uvalde	2	3	0
Texas	Val Verde	18	24	14
Texas	Van Zandt	2	3	0
Texas	Victoria	7	10	5
Texas	Walker	2	3	1
Texas	Waller	2	3	0
Texas	Ward	2	3	1
Texas	Washington	3	4	2
Texas	Webb	22	29	17
Texas	Wharton	2	3	0
Texas	Wheeler	2	3	0
Texas	Wichita	18	24	14
Texas	Wilbarger	2	3	0
Texas	Willacy	3	4	2
Texas	Williamson	8	11	6
Texas	Wilson	2	3	1
Texas	Winkler	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Texas	Wise	3	4	2
Texas	Wood	4	6	3
Texas	Yoakum	2	3	0
Texas	Young	2	3	0
Texas	Zapata	4	6	3
Texas	Zavala	2	3	0
Utah	Beaver	2	3	0
Utah	Box Elder	2	3	0
Utah	Cache	6	8	4
Utah	Carbon	2	3	0
Utah	Daggett	2	3	0
Utah	Davis	12	16	9
Utah	Duchesne	2	3	0
Utah	Emery	19	25	15
Utah	Garfield	2	3	0
Utah	Grand	2	3	0
Utah	Iron	2	3	1
Utah	Juab	2	3	0
Utah	Kane	2	3	0
Utah	Millard	2	3	0
Utah	Morgan	2	3	0
Utah	Piute	4	6	3
Utah	Rich	2	3	0
Utah	Salt Lake	110	144	87
Utah	San Juan	2	3	0
Utah	Sanpete	7	10	5
Utah	Sevier	2	3	0
Utah	Summit	6	8	4
Utah	Tooele	2	3	0
Utah	Uintah	2	3	0
Utah	Utah	21	28	16
Utah	Wasatch	3	4	2
Utah	Washington	2	3	1
Utah	Wayne	2	3	0
Utah	Weber	14	19	11
Vermont	Addison	2	3	0
Vermont	Bennington	2	3	0
Vermont	Caledonia	2	3	0
Vermont	Chittenden	2	3	1
Vermont	Essex	2	3	0
Vermont	Franklin	2	3	0
Vermont	Grand Isle	2	3	0
Vermont	Lamoille	2	3	0
Vermont	Orange	2	3	0
Vermont	Orleans	3	4	2
Vermont	Rutland	2	3	0
Vermont	Washington	2	3	1
Vermont	Windham	2	3	0
Vermont	Windsor	2	3	0
Virgin Islands	Virgin Islands	8	11	6
Virginia	Accomack	3	4	2
Virginia	Albemarle	2	3	0
Virginia	Alexandria City	29	38	23
Virginia	Alleghany	2	3	0
Virginia	Amelia	2	3	0
Virginia	Amherst	2	3	0
Virginia	Appomattox	2	3	0
Virginia	Arlington	23	30	18
Virginia	Augusta	7	10	5
Virginia	Bath	2	3	0
Virginia	Bedford	4	6	3
Virginia	Bedford City	2	3	0
Virginia	Bland	2	3	0

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Virginia	Botetourt	2	3	0
Virginia	Bristol City	2	3	0
Virginia	Brunswick	2	3	0
Virginia	Buchanan	2	3	0
Virginia	Buckingham	2	3	0
Virginia	Buena Vista City	2	3	0
Virginia	Campbell	3	4	2
Virginia	Caroline	2	3	0
Virginia	Carroll	2	3	0
Virginia	Charles City	2	3	1
Virginia	Charlotte	2	3	0
Virginia	Charlottesville City	3	4	2
Virginia	Chesapeake City	4	6	3
Virginia	Chesterfield	27	36	21
Virginia	Clarke	2	3	0
Virginia	Clifton Forge City	2	3	0
Virginia	Colonial Heights City	8	11	6
Virginia	Covington City	2	3	0
Virginia	Craig	2	3	0
Virginia	Culpeper	6	8	4
Virginia	Cumberland	2	3	0
Virginia	Danville City	3	4	2
Virginia	Dickenson	3	4	2
Virginia	Dinwiddie	2	3	0
Virginia	Emporia City	2	3	0
Virginia	Essex	2	3	0
Virginia	Fairfax	75	98	59
Virginia	Fairfax City	3	4	2
Virginia	Falls Church City	2	3	0
Virginia	Fauquier	2	3	0
Virginia	Floyd	11	15	8
Virginia	Fluvanna	2	3	0
Virginia	Franklin	3	4	2
Virginia	Franklin City	2	3	0
Virginia	Frederick	2	3	0
Virginia	Fredericksburg City	4	6	3
Virginia	Galax City	2	3	0
Virginia	Giles	4	6	3
Virginia	Gloucester	2	3	0
Virginia	Goochland	3	4	2
Virginia	Grayson	2	3	0
Virginia	Greene	2	3	0
Virginia	Greensville	2	3	0
Virginia	Halifax	27	36	21
Virginia	Hampton City	6	8	4
Virginia	Hanover	8	11	6
Virginia	Harrisonburg City	2	3	0
Virginia	Henrico	24	32	19
Virginia	Henry	4	6	3
Virginia	Highland	2	3	0
Virginia	Hopewell City	3	4	2
Virginia	Isle of Wight	2	3	0
Virginia	James City	2	3	0
Virginia	King and Queen	2	3	0
Virginia	King George	4	6	3
Virginia	King William	2	3	0
Virginia	Lancaster	2	3	0
Virginia	Lee	2	3	0
Virginia	Lexington City	2	3	0
Virginia	Loudoun	19	25	15
Virginia	Louisa	2	3	0
Virginia	Lunenburg	2	3	1
Virginia	Lynchburg City	3	4	2

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Virginia	Madison	2	3	0
Virginia	Manassas City	2	3	1
Virginia	Manassas Park City	2	3	0
Virginia	Martinsville City	2	3	1
Virginia	Mathews	2	3	0
Virginia	Mecklenburg	9	12	7
Virginia	Middlesex	2	3	0
Virginia	Montgomery	2	3	0
Virginia	Nelson	2	3	0
Virginia	New Kent	2	3	0
Virginia	Newport News City	12	16	9
Virginia	Norfolk City	14	19	11
Virginia	Northampton	2	3	0
Virginia	Northumberland	2	3	1
Virginia	Norton City	2	3	0
Virginia	Nottoway	2	3	0
Virginia	Orange	2	3	1
Virginia	Page	3	4	2
Virginia	Patrick	2	3	0
Virginia	Petersburg City	2	3	1
Virginia	Pittsylvania	8	11	6
Virginia	Poquoson City	2	3	0
Virginia	Portsmouth City	6	8	4
Virginia	Powhatan	3	4	2
Virginia	Prince Edward	6	8	4
Virginia	Prince George	2	3	0
Virginia	Prince William	17	23	13
Virginia	Pulaski	2	3	0
Virginia	Radford City	2	3	0
Virginia	Rappahannock	2	3	0
Virginia	Richmond	2	3	0
Virginia	Richmond City	26	34	20
Virginia	Roanoke	6	8	4
Virginia	Roanoke City	4	6	3
Virginia	Rockbridge	2	3	0
Virginia	Rockingham	2	3	0
Virginia	Russell	2	3	1
Virginia	Salem City	2	3	0
Virginia	Scott	2	3	0
Virginia	Shenandoah	2	3	1
Virginia	Smyth	2	3	0
Virginia	Southampton	2	3	0
Virginia	Spotsylvania	7	10	5
Virginia	Stafford	3	4	2
Virginia	Staunton City	2	3	0
Virginia	Suffolk City	2	3	0
Virginia	Surry	2	3	0
Virginia	Sussex	2	3	0
Virginia	Tazewell	4	6	3
Virginia	Virginia Beach City	42	55	33
Virginia	Warren	3	4	2
Virginia	Washington	2	3	0
Virginia	Waynesboro City	3	4	2
Virginia	Westmoreland	2	3	1
Virginia	Williamsburg City	3	4	2
Virginia	Winchester City	3	4	2
Virginia	Wise	8	11	6
Virginia	Wythe	2	3	0
Virginia	York	2	3	0
Washington	Adams	4	6	3
Washington	Asotin	2	3	0
Washington	Benton	3	4	2
Washington	Chelan	4	6	3

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Washington	Clallam	2	3	0
Washington	Clark	19	25	15
Washington	Columbia	2	3	0
Washington	Cowlitz	2	3	0
Washington	Douglas	2	3	0
Washington	Ferry	2	3	0
Washington	Franklin	7	10	5
Washington	Garfield	2	3	0
Washington	Grant	2	3	1
Washington	Grays Harbor	2	3	0
Washington	Island	2	3	0
Washington	Jefferson	2	3	0
Washington	King	153	200	121
Washington	Kitsap	4	6	3
Washington	Kittitas	2	3	0
Washington	Klickitat	2	3	0
Washington	Lewis	2	3	1
Washington	Lincoln	2	3	0
Washington	Mason	4	6	3
Washington	Okanogan	2	3	1
Washington	Pacific	2	3	0
Washington	Pend Oreille	2	3	0
Washington	Pierce	28	37	22
Washington	San Juan	2	3	0
Washington	Skagit	2	3	0
Washington	Skamania	2	3	0
Washington	Snohomish	45	59	35
Washington	Spokane	18	24	14
Washington	Stevens	2	3	0
Washington	Thurston	6	8	4
Washington	Wahkiakum	2	3	0
Washington	Walla Walla	2	3	0
Washington	Whatcom	17	23	13
Washington	Whitman	2	3	0
Washington	Yakima	17	23	13
West Virginia	Barbour	2	3	1
West Virginia	Berkeley	6	8	4
West Virginia	Boone	2	3	0
West Virginia	Braxton	2	3	0
West Virginia	Brooke	2	3	0
West Virginia	Cabell	2	3	1
West Virginia	Calhoun	3	4	2
West Virginia	Clay	2	3	0
West Virginia	Doddridge	2	3	0
West Virginia	Fayette	2	3	0
West Virginia	Gilmer	2	3	0
West Virginia	Grant	2	3	0
West Virginia	Greenbrier	2	3	0
West Virginia	Hampshire	2	3	0
West Virginia	Hancock	3	4	2
West Virginia	Hardy	2	3	0
West Virginia	Harrison	6	8	4
West Virginia	Jackson	2	3	0
West Virginia	Jefferson	2	3	0
West Virginia	Kanawha	28	37	22
West Virginia	Lewis	2	3	0
West Virginia	Lincoln	2	3	0
West Virginia	Logan	2	3	0
West Virginia	Marion	2	3	0
West Virginia	Marshall	2	3	0
West Virginia	Mason	2	3	0
West Virginia	McDowell	2	3	0
West Virginia	Mercer	13	17	10

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
West Virginia	Mineral	2	3	0
West Virginia	Mingo	2	3	0
West Virginia	Monongalia	3	4	2
West Virginia	Monroe	2	3	0
West Virginia	Morgan	2	3	0
West Virginia	Nicholas	2	3	0
West Virginia	Ohio	3	4	2
West Virginia	Pendleton	2	3	0
West Virginia	Pleasants	2	3	0
West Virginia	Pocahontas	2	3	0
West Virginia	Preston	2	3	1
West Virginia	Putnam	2	3	0
West Virginia	Raleigh	3	4	2
West Virginia	Randolph	3	4	2
West Virginia	Ritchie	3	4	2
West Virginia	Roane	2	3	0
West Virginia	Summers	2	3	0
West Virginia	Taylor	2	3	0
West Virginia	Tucker	2	3	0
West Virginia	Tyler	2	3	0
West Virginia	Upshur	3	4	2
West Virginia	Wayne	2	3	0
West Virginia	Webster	2	3	0
West Virginia	Wetzel	2	3	0
West Virginia	Wirt	2	3	0
West Virginia	Wood	6	8	4
West Virginia	Wyoming	2	3	0
Wisconsin	Adams	2	3	0
Wisconsin	Ashland	2	3	0
Wisconsin	Barron	14	19	11
Wisconsin	Bayfield	2	3	1
Wisconsin	Brown	23	30	18
Wisconsin	Buffalo	3	4	2
Wisconsin	Burnett	3	4	2
Wisconsin	Calumet	2	3	1
Wisconsin	Chippewa	2	3	1
Wisconsin	Clark	2	3	0
Wisconsin	Columbia	4	6	3
Wisconsin	Crawford	7	10	5
Wisconsin	Dane	21	28	16
Wisconsin	Dodge	13	17	10
Wisconsin	Door	2	3	0
Wisconsin	Douglas	3	4	2
Wisconsin	Dunn	6	8	4
Wisconsin	Eau Claire	2	3	1
Wisconsin	Florence	2	3	0
Wisconsin	Fond du Lac	2	3	0
Wisconsin	Forest	2	3	0
Wisconsin	Grant	3	4	2
Wisconsin	Green	4	6	3
Wisconsin	Green Lake	2	3	0
Wisconsin	Iowa	3	4	2
Wisconsin	Iron	2	3	0
Wisconsin	Jackson	2	3	0
Wisconsin	Jefferson	4	6	3
Wisconsin	Juneau	2	3	1
Wisconsin	Kenosha	11	15	8
Wisconsin	Kewaunee	7	10	5
Wisconsin	La Crosse	7	10	5
Wisconsin	Lafayette	2	3	0
Wisconsin	Langlade	2	3	1
Wisconsin	Lincoln	3	4	2
Wisconsin	Manitowoc	3	4	2

APPENDIX A.—NOTICE OF CAPACITY REQUIREMENTS BY COUNTY FOR TELECOMMUNICATIONS CARRIERS PROVIDING LOCAL SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a county.]*

State	County	County requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
Wisconsin	Marathon	2	3	1
Wisconsin	Marinette	3	4	2
Wisconsin	Marquette	3	4	2
Wisconsin	Menominee	6	8	4
Wisconsin	Milwaukee	61	80	48
Wisconsin	Monroe	2	3	0
Wisconsin	Oconto	2	3	1
Wisconsin	Oneida	2	3	0
Wisconsin	Outagamie	8	11	6
Wisconsin	Ozaukee	6	8	4
Wisconsin	Pepin	2	3	0
Wisconsin	Pierce	31	41	24
Wisconsin	Polk	3	4	2
Wisconsin	Portage	2	3	0
Wisconsin	Price	22	29	17
Wisconsin	Racine	13	17	10
Wisconsin	Richland	4	6	3
Wisconsin	Rock	12	16	9
Wisconsin	Rusk	2	3	0
Wisconsin	Sauk	6	8	4
Wisconsin	Sawyer	2	3	0
Wisconsin	Shawano	9	12	7
Wisconsin	Sheboygan	7	10	5
Wisconsin	St. Croix	4	6	3
Wisconsin	Taylor	12	16	9
Wisconsin	Trempealeau	2	3	0
Wisconsin	Vernon	2	3	0
Wisconsin	Vilas	2	3	0
Wisconsin	Walworth	2	3	0
Wisconsin	Washburn	6	8	4
Wisconsin	Washington	3	4	2
Wisconsin	Waukesha	12	16	9
Wisconsin	Waupaca	9	12	7
Wisconsin	Waushara	2	3	0
Wisconsin	Winnebago	2	3	0
Wisconsin	Wood	3	4	2
Wyoming	Albany	2	3	0
Wyoming	Big Horn	2	3	0
Wyoming	Campbell	7	10	5
Wyoming	Carbon	2	3	1
Wyoming	Converse	2	3	0
Wyoming	Crook	2	3	0
Wyoming	Fremont	2	3	0
Wyoming	Goshen	2	3	0
Wyoming	Hot Springs	2	3	0
Wyoming	Johnson	2	3	0
Wyoming	Laramie	6	8	4
Wyoming	Lincoln	2	3	0
Wyoming	Natrona	3	4	2
Wyoming	Niobrara	2	3	0
Wyoming	Park	2	3	0
Wyoming	Platte	2	3	0
Wyoming	Sheridan	2	3	0
Wyoming	Sublette	2	3	0
Wyoming	Sweetwater	3	4	2
Wyoming	Teton	3	4	2
Wyoming	Uinta	9	12	7
Wyoming	Washakie	2	3	0
Wyoming	Weston	2	3	0

*The term ''county'' includes boroughs and parishes as well as the District of Columbia and independent cities. U.S. territories (i.e., American Samoa, Guam, Mariana Islands, Puerto Rico, and the U.S. Virgin Islands) were considered as single entities.

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
1	New York, NY	181	294	106
2	Los Angeles, CA	103	167	60
3	Chicago, IL	48	78	28
4	Philadelphia, PA	30	49	17
5	Detroit-Ann Arbor, MI	48	78	28
6	Boston, MA–NH	40	65	23
7	San Francisco-Oakland, CA	35	57	20
8	Washington, DC–MD–VA	65	106	38
9	Dallas-Fort Worth, TX	40	65	23
10	Houston, TX	84	137	49
11	St. Louis, MO–IL	23	38	13
12	Miami-Fort Lauderdale-Hollywood, FL	82	133	48
13	Pittsburgh, PA	16	26	9
14	Baltimore, MD	69	112	40
15	Minneapolis-St. Paul, MN	33	54	19
16	Cleveland, OH	28	46	16
17	Atlanta, GA	12	20	7
18	San Diego, CA	23	38	13
19	Denver-Boulder, CO	40	65	23
20	Seattle-Everett, WA	14	23	8
21	Milwaukee, WI	4	7	2
22	Tampa-St. Petersburg, FL	14	23	8
23	Cincinnati, OH–KY–IN	2	4	0
24	Kansas City, MO–KS	23	38	13
25	Buffalo, NY	12	20	7
26	Phoenix, AZ	43	70	25
27	San Jose, CA	33	54	19
28	Indianapolis, IN	9	15	5
29	New Orleans, LA	21	35	12
30	Portland, OR–WA	18	30	10
31	Columbus, OH	6	10	3
32	Hartford-New Britain-Bristol, CT	2	4	1
33	San Antonio, TX	36	59	21
34	Rochester, NY	7	12	4
35	Sacramento, CA	4	7	2
36	Memphis, TN–AR–MS	4	7	2
37	Louisville, KY–IN	2	4	0
38	Providence-Warwick-Pawtucket, RI–MA	4	7	2
39	Salt Lake City-Ogden, UT	26	43	15
40	Dayton, OH	2	4	0
41	Birmingham, AL	6	10	3
42	Bridgeport-Stamford-Norwalk, CT	9	15	5
43	Norfolk-Virginia Beach-Portsmouth-Danbury, VA	2	4	0
44	Albany-Schenectady-Troy, NY	2	4	0
45	Oklahoma City, OK	6	10	3
46	Nashville-Davidson, TN	4	7	2
47	Greensboro-Winston Salem-High Point, NC	2	4	0
48	Toledo, OH–MI	16	26	9
49	New Haven-West New Haven-Waterbury, CT	2	4	1
50	Honolulu, HI	7	12	4
51	Jacksonville, FL	6	10	3
52	Akron, OH	23	38	13
53	Syracuse, NY	7	12	4
54	Gary-Hammond-East Chicago, IN	48	78	28
55	Worcester-Fitchburg-Leominster, MA	11	18	6
56	Ne Pennsylvania, PA	2	4	0
57	Tulsa, OK	2	4	1
58	Allentown-Bethlehem-Easton, PA–NJ	23	38	13
59	Richmond, VA	2	4	0
60	Orlando, FL	14	23	8
61	Charlotte-Gastonia, NC	2	4	1
62	New Brunswick-Perth Amboy-Sayreville, NJ	93	151	54
63	Springfield-Chicopee-Holyoke, MA–CT	2	4	1

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
64	Grand Rapids, MI	16	26	9
65	Omaha, NE–IA	12	20	7
66	Youngstown-Warren, OH	6	10	3
67	Greenville-Spartanburg, SC	2	4	1
68	Flint, MI	38	62	22
69	Wilmington, DE–NJ–MD	23	38	13
70	Long Branch-Asbury Park, NJ	93	151	54
71	Raleigh-Durham, NC	4	7	2
72	West Palm Beach-Boca Raton, FL	82	133	48
73	Oxnard-Simi Valley-Ventura, CA	48	78	28
74	Fresno, CA	2	4	0
75	Austin, TX	11	18	6
76	New Bedford-Fall River, MA–RI	4	7	2
77	Tucson, AZ	60	98	35
78	Lansing-East Lansing, MI	16	26	9
79	Knoxville, TN	7	12	4
80	Baton Rouge, LA	2	4	0
81	El Paso, TX	18	30	10
82	Tacoma, WA	14	23	8
83	Mobile, AL	2	4	1
84	Harrisburg, PA	4	7	2
85	Johnson City-Kingsport-Bristol, TN–VA	2	4	1
86	Albuquerque, NM	7	12	4
87	Canton, OH	28	46	16
88	Chattanooga, TN–GA	2	4	0
89	Wichita, KS	2	4	0
90	Charleston-North Charleston, SC	2	4	0
91	San Juan-Caguas, PR	35	57	20
92	Little Rock-North Little Rock, AR	2	4	1
93	Las Vegas, NV	50	82	29
94	Saginaw-Bay City-Midland, MI	16	26	9
95	Columbia, SC	2	4	0
96	Fort Wayne, IN	7	12	4
97	Bakersfield, CA	2	4	1
98	Davenport-Rock Island-Moline, IA–IL	2	4	0
99	York, PA	4	7	2
100	Shreveport, LA	2	4	1
101	Beaumont-Port Arthur, TX	33	54	19
102	Des Moines, IA	4	7	2
103	Peoria, IL	2	4	0
104	Newport News-Hampton, VA	2	4	0
105	Lancaster, PA	4	7	2
106	Jackson, MS	4	7	2
107	Stockton, CA	4	7	2
108	Augusta, GA–SC	2	4	0
109	Spokane, WA	2	4	0
110	Huntington-Ashland, WV–KY–OH	2	4	1
111	Vallejo-Fairfield-Napa, CA	33	54	19
112	Corpus Christi, TX	11	18	6
113	Madison, WI	2	4	0
114	Lakeland-Winter Haven, FL	19	31	11
115	Utica-Rome, NY	2	4	0
116	Lexington-Fayette, KY	6	10	3
117	Colorado Springs, CO	33	54	19
118	Reading, PA	21	35	12
119	Evansville, IN–KY	2	4	0
120	Huntsville, AL	2	4	0
121	Trenton, NJ	21	35	12
122	Binghamton, NY	2	4	0
123	Santa Rosa-Petaluma, CA	33	54	19
124	Santa Barbara-Santa Maria-Lompoc, CA	19	31	11
125	Appleton-Oskosh-Neenah, WI	2	4	0
126	Salinas-Seaside-Monterey, CA	19	31	11

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
127	Pensacola, FL	2	4	1
128	Mcallen-Edinburgh-Mission, TX	12	20	7
129	South Bend-Mishawaka, IN	2	4	0
130	Erie, PA	24	39	14
131	Rockford, IL	9	15	5
132	Kalamazoo, MI	7	12	4
133	Manchester-Nashua, NH	2	4	0
134	Atlantic City, NJ	4	7	2
135	Eugene-Springfield, OR	11	18	6
136	Lorain-Elyria, OH	28	46	16
137	Melbourne-Titusville-Palm Bay, FL	14	23	8
138	Macon-Warner Robins, GA	9	15	5
139	Montgomery, AL	2	4	0
140	Charleston, WV	2	4	1
141	Duluth, MN–WI	2	4	1
142	Modesto, CA	6	10	3
143	Johnstown, PA	16	26	9
144	Orange County, NY	2	4	0
145	Hamilton-Middletown, OH	2	4	0
146	Daytona Beach, FL	11	18	6
147	Ponce, PR	30	49	17
148	Salem, OR	18	30	10
149	Fayetteville, NC	2	4	0
150	Visalia-Tulare-Porterville, CA	2	4	0
151	Poughkeepsie, NY	2	4	0
152	Portland, ME	2	4	0
153	Columbus, GA-AL	2	4	0
154	New London-Norwich, CT	4	7	2
155	Savannah, GA	2	4	1
156	Portsmouth-Dover-Rochester, NH–ME	2	4	0
157	Roanoke, VA	2	4	1
158	Lima, OH	16	26	9
159	Provo-Orem, UT	14	23	8
160	Killeen-Temple, TX	2	4	1
161	Lubbock, TX	11	18	6
162	Brownsville-Harlingen, TX	9	15	5
163	Springfield, MO	2	4	0
164	Fort Myers, FL	11	18	6
165	Fort Smith, AR–OK	2	4	0
166	Hickory, NC	2	4	0
167	Sarasota, FL	19	31	11
168	Tallahassee, FL	2	4	0
169	Mayaguez, PR	31	51	18
170	Galveston-Texas City, TX	33	54	19
171	Reno, NV	2	4	0
172	Lincoln, NE	2	4	0
173	Biloxi-Gulfport, MS	2	4	0
174	Lafayette, LA	2	4	0
175	Santa Cruz, CA	19	31	11
176	Springfield, IL	2	4	0
177	Battle Creek, MI	7	12	4
178	Wheeling, WV–OH	16	26	9
179	Topeka, KS	23	38	13
180	Springfield, OH	2	4	0
181	Muskegon, MI	16	26	9
182	Fayetteville-Springdale, AR	2	4	0
183	Asheville, NC	2	4	0
184	Houma-Thibodaux, LA	2	4	0
185	Terre Haute, IN	7	12	4
186	Green Bay, WI	2	4	0
187	Anchorage, AK	2	4	0
188	Amarillo, TX	2	4	0
189	Racine, WI	4	7	2

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
190	Boise City, ID	2	4	0
191	Yakima, WA	2	4	0
192	Gainesville, FL	2	4	0
193	Benton Harbor, MI	2	4	0
194	Waco, TX	6	10	3
195	Cedar Rapids, IA	2	4	0
196	Champaign-Urbana-Rantoul, IL	2	4	0
197	Lake Charles, LA	2	4	0
198	St. Cloud, MN	23	38	13
199	Steubenville-Weirton, OH–WV	2	4	1
200	Parkersburg-Marietta, WV–OH	2	4	1
201	Waterloo-Cedar Falls, IA	2	4	0
202	Arecibo, PR	31	51	18
203	Lynchburg, VA	2	4	0
204	Aguadilla, PR	31	51	18
205	Alexandria, LA	2	4	0
206	Longview-Marshall, TX	2	4	1
207	Jackson, MI	2	4	0
208	Fort Pierce, FL	62	101	36
209	Clarksville-Hopkinsville, TN–KY	4	7	2
210	Fort Collins-Loveland, CO	43	70	25
211	Bradenton, FL	14	23	8
212	Bremerton, WA	11	18	6
213	Pittsfield, MA	2	4	1
214	Richland-Kennewick-Pasco, WA	2	4	0
215	Chico, CA	2	4	0
216	Janesville-Beloit, WI	2	4	0
217	Anderson, IN	7	12	4
218	Wilmington, NC	2	4	0
219	Monroe, LA	2	4	0
220	Abilene, TX	4	7	2
221	Fargo-Moorehead, ND–MN	2	4	0
222	Tuscaloosa, AL	6	10	3
223	Elkhart-Goshen, IN	2	4	0
224	Bangor, ME	2	4	0
225	Altoona, PA	2	4	1
226	Florence, AL	4	7	2
227	Anderson, SC	2	4	1
228	Vineland-Milville-Bridgeton, NJ	4	7	2
229	Medford, OR	9	15	5
230	Decatur, IL	2	4	0
231	Mansfield, OH	2	4	0
232	Eau Claire, WI	2	4	0
233	Wichita Falls, TX	2	4	1
234	Athens, GA	12	20	7
235	Petersburg-Colonial Hts-Hopewell, VA	2	4	0
236	Muncie, IN	7	12	4
237	Tyler, TX	2	4	0
238	Sharon, PA	6	10	3
239	Joplin, MO	2	4	0
240	Texarkana, TX–AR	2	4	0
241	Pueblo, CO	33	54	19
242	Olympia, WA	11	18	6
243	Greeley, CO	43	70	25
244	Kenosha, WI	4	7	2
245	Ocala, FL	14	23	8
246	Dothan, AL	2	4	0
247	Lafayette, IN	7	12	4
248	Burlington, VT	2	4	0
249	Anniston, AL	6	10	3
250	Bloomington-Normal, IL	2	4	0
251	Williamsport, PA	2	4	0
252	Pascagoula, MS	2	4	0

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
253	Sioux City, IA–NE	2	4	0
254	Redding, CA	2	4	0
255	Odessa, TX	7	12	4
256	Charlottesville, VA	2	4	0
257	Hagerstown, MD	2	4	0
258	Jacksonville, NC	2	4	0
259	State College, PA	4	7	2
260	Lawton, OK	2	4	0
261	Albany, GA	2	4	0
262	Danville, VA	2	4	0
263	Wausau, WI	2	4	0
264	Florence, SC	2	4	0
265	Fort Walton Beach, FL	2	4	0
266	Glens Falls, NY	2	4	0
267	Sioux Falls, SD	2	4	0
268	Billings, MT	2	4	0
269	Cumberland, MD–WV	2	4	0
270	Bellingham, WA	11	18	6
271	Kokomo, IN	7	12	4
272	Gadsden, AL	6	10	3
273	Kankakee, IL	48	78	28
274	Yuba City, CA	4	7	2
275	St. Joseph, MO	23	38	13
276	Grand Forks, ND–MN	2	4	0
277	Sheboygan, WI	4	7	2
278	Columbia, MO	2	4	0
279	Lewiston-Auburn, ME	2	4	0
280	Burlington, NC	2	4	0
281	Laredo, TX	2	4	0
282	Bloomington, IN	7	12	4
283	Panama City, FL	2	4	0
284	Elmira, NY	2	4	0
285	Las Cruces, NM	7	12	4
286	Dubuque, IA	2	4	0
287	Bryan-College Station, TX	33	54	19
288	Rochester, MN	23	38	13
289	Rapid City, SD	2	4	0
290	Lacrosse, WI	2	4	0
291	Pine Bluff, AR	2	4	1
292	Sherman-Denison, TX	31	51	18
293	Owensboro, KY	2	4	0
294	San Angelo, TX	2	4	0
295	Midland, TX	2	4	0
296	Iowa City, IA	2	4	0
297	Great Falls, MT	4	7	2
298	Bismarck, ND	2	4	0
299	Casper, WY	2	4	0
300	Victoria, TX	2	4	0
301	Lawrence, KS	23	38	13
302	Enid, OK	2	4	0
303	Aurora-Elgin, IL	48	78	28
304	Joliet, IL	48	78	28
305	Alton-Granite City, IL	2	4	0
306	Gulf Of Mexico	2	4	0
307	Alabama 01—Franklin	2	4	0
308	Alabama 02—Jackson	2	4	0
309	Alabama 03—Lamar	2	4	0
310	Alabama 04—Bibb	2	4	0
311	Alabama 05—Cleburne	6	10	3
312	Alabama 06—Washington	2	4	0
313	Alabama 07—Butler	2	4	0
314	Alabama 08—Lee	2	4	0
315	Alaska 01—Wade Hampton	2	4	0

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
316	Alaska 02—Bethel	2	4	0
317	Alaska 03—Haines	2	4	0
318	Arizona 01—Mohave	2	4	0
319	Arizona 02—Coconino	2	4	0
320	Arizona 03—Navajo	2	4	0
321	Arizona 04—Yuma	33	54	19
322	Arizona 05—Gila	12	20	7
323	Arizona 06—Graham	12	20	7
324	Arkansas 01—Madison	2	4	0
325	Arkansas 02—Marion	2	4	0
326	Arkansas 03—Sharp	2	4	0
327	Arkansas 04—Clay	2	4	0
328	Arkansas 05—Cross	2	4	0
329	Arkansas 06—Cleburne	2	4	0
330	Arkansas 07—Pope	2	4	0
331	Arkansas 08—Franklin	2	4	0
332	Arkansas 09—Polk	2	4	0
333	Arkansas 10—Garland	2	4	0
334	Arkansas 11—Hempstead	2	4	0
335	Arkansas 12—Ouachita	2	4	0
336	California 01—Del Norte	2	4	0
337	California 02—Modoc	2	4	0
338	California 03—Alpine	2	4	1
339	California 04—Madera	2	4	0
340	California 05—San Luis Obispo	19	31	11
341	California 06—Mono	2	4	0
342	California 07—Imperial	2	4	1
343	California 08—Tehama	2	4	0
344	California 09—Mendocino	19	31	11
345	California 10—Sierra	4	7	2
346	California 11—El Dorado	4	7	2
347	California 12—Kings	2	4	0
348	Colorado 01—Moffat	2	4	0
349	Colorado 02—Logan	2	4	0
350	Colorado 03—Garfield	2	4	0
351	Colorado 04—Park	2	4	0
352	Colorado 05—Elbert	2	4	0
353	Colorado 06—San Miguel	2	4	0
354	Colorado 07—Saguache	33	54	19
355	Colorado 08—Kiowa	2	4	0
356	Colorado 09—Costilla	33	54	19
357	Connecticut 01—Litchfield	2	4	0
358	Connecticut 02—Windham	2	4	0
359	Deleware 01—Kent	21	35	12
360	Florida 01—Collier	38	62	22
361	Florida 02—Glades	108	176	63
362	Florida 03—Hardee	11	18	6
363	Florida 04—Citrus	14	23	8
364	Florida 05—Putnam	2	4	0
365	Florida 06—Dixie	2	4	0
366	Florida 07—Hamilton	2	4	0
367	Florida 08—Jefferson	2	4	0
368	Florida 09—Calhoun	2	4	0
369	Florida 10—Walton	2	4	1
370	Florida 11—Monroe	82	133	48
371	Georgia 01—Whitfield	2	4	0
372	Georgia 02—Dawson	2	4	0
373	Georgia 03—Chattooga	11	18	6
374	Georgia 04—Jasper	11	18	6
375	Georgia 05—Haralson	2	4	0
376	Georgia 06—Spalding	2	4	0
377	Georgia 07—Hancock	2	4	0
378	Georgia 08—Warren	2	4	0

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
379	Georgia 09—Marion	2	4	1
380	Georgia 10—Bleckley	2	4	0
381	Georgia 11—Toombs	2	4	0
382	Georgia 12—Liberty	2	4	0
383	Georgia 13—Early	2	4	0
384	Georgia 14—Worth	2	4	0
385	Hawaii 01—Kauai	4	7	2
386	Hawaii 02—Maui	4	7	2
387	Hawaii 03—Hawaii	4	7	2
388	Idaho 01—Boundary	2	4	0
389	Idaho 02—Idaho	2	4	0
390	Idaho 03—Lemhi	2	4	0
391	Idaho 04—Elmore	2	4	0
392	Idaho 05—Butte	11	18	6
393	Idaho 06—Clark	2	4	0
394	Illinois 01—Jo Daviess	9	15	5
395	Illinois 02—Bureau	2	4	0
396	Illinois 03—Mercer	2	4	0
397	Illinois 04—Adams	2	4	0
398	Illinois 05—Mason	2	4	0
399	Illinois 06—Montgomery	2	4	0
400	Illinois 07—Vermilion	2	4	0
401	Illinois 08—Washington	2	4	0
402	Illinois 09—Clay	2	4	0
403	Indiana 01—Newton	7	12	4
404	Indiana 02—Kosciusko	2	4	0
405	Indiana 03—Huntington	7	12	4
406	Indiana 04—Miami	2	4	0
407	Indiana 05—Warren	2	4	0
408	Indiana 06—Randolph	7	12	4
409	Indiana 07—Owen	2	4	0
410	Indiana 08—Brown	7	12	4
411	Indiana 09—Decatur	7	12	4
412	Iowa 01—Mills	2	4	0
413	Iowa 02—Union	2	4	0
414	Iowa 03—Monroe	2	4	0
415	Iowa 04—Muscatine	2	4	0
416	Iowa 05—Jackson	2	4	0
417	Iowa 06—Iowa	2	4	0
418	Iowa 07—Audubon	2	4	0
419	Iowa 08—Monona	2	4	0
420	Iowa 09—Ida	2	4	0
421	Iowa 10—Humboldt	2	4	0
422	Iowa 11—Hardin	2	4	0
423	Iowa 12—Winneshiek	2	4	0
424	Iowa 13—Mitchell	2	4	0
425	Iowa 14—Kossuth	2	4	0
426	Iowa 15—Dickinson	2	4	0
427	Iowa 16—Lyon	2	4	0
428	Kansas 01—Cheyenne	2	4	0
429	Kansas 02—Norton	2	4	0
430	Kansas 03—Jewell	2	4	0
431	Kansas 04—Marshall	2	4	0
432	Kansas 05—Brown	2	4	0
433	Kansas 06—Wallace	2	4	0
434	Kansas 07—Trego	2	4	0
435	Kansas 08—Ellsworth	2	4	0
436	Kansas 09—Morris	2	4	0
437	Kansas 10—Franklin	2	4	0
438	Kansas 11—Hamilton	2	4	0
439	Kansas 12—Hodgeman	2	4	0
440	Kansas 13—Edwards	2	4	0
441	Kansas 14—Reno	2	4	0

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
442	Kansas 15—Elk	2	4	0
443	Kentucky 01—Fulton	2	4	0
444	Kentucky 02—Union	2	4	0
445	Kentucky 03—Meade	2	4	0
446	Kentucky 04—Spencer	2	4	0
447	Kentucky 05—Barren	2	4	0
448	Kentucky 06—Madison	2	4	0
449	Kentucky 07—Trimble	2	4	0
450	Kentucky 08—Mason	2	4	0
451	Kentucky 09—Elliott	2	4	0
452	Kentucky 10—Powell	2	4	0
453	Kentucky 11—Clay	6	10	3
454	Louisiana 01—Claiborne	2	4	0
455	Louisiana 02—Morehouse	2	4	0
456	Louisiana 03—De Soto	2	4	0
457	Louisiana 04—Caldwell	2	4	0
458	Louisiana 05—Beauregard	2	4	0
459	Louisiana 06—Iberville	2	4	0
460	Louisiana 07—West Feliciana	2	4	0
461	Louisiana 08—St. James	2	4	0
462	Louisiana 09—Plaquemines	2	4	0
463	Maine 01—Oxford	2	4	0
464	Maine 02—Somerset	2	4	0
465	Maine 03—Kennebec	2	4	0
466	Maine 04—Washington	2	4	0
467	Maryland 01—Garrett	2	4	0
468	Maryland 02—Kent	28	46	16
469	Maryland 03—Frederick	26	43	15
470	Massachusetts 01—Franklin	2	4	0
471	Massachusetts 02—Barnstable	11	18	6
472	Michigan 01—Gogebic	2	4	0
473	Michigan 02—Alger	2	4	0
474	Michigan 03—Emmet	2	4	0
475	Michigan 04—Cheboygan	2	4	0
476	Michigan 05—Manistee	2	4	0
477	Michigan 06—Roscommon	2	4	0
478	Michigan 07—Newaygo	2	4	0
479	Michigan 08—Allegan	6	10	3
480	Michigan 09—Cass	2	4	0
481	Michigan 10—Tuscola	2	4	0
482	Minnesota 01—Kittson	2	4	1
483	Minnesota 02—Lake of the Woods	2	4	1
484	Minnesota 03—Koochiching	2	4	1
485	Minnesota 04—Lake	2	4	0
486	Minnesota 05—Wilkin	2	4	1
487	Minnesota 06—Hubbard	2	4	1
488	Minnesota 07—Chippewa	2	4	0
489	Minnesota 08—Lac Qui Pari	2	4	0
490	Minnesota 09—Pipestone	2	4	0
491	Minnesota 10—Le Sueur	2	4	0
492	Minnesota 11—Goodhue	2	4	0
493	Mississippi 01—Tunica	2	4	0
494	Mississippi 02—Benton	2	4	0
495	Mississippi 03—Bolivar	2	4	0
496	Mississippi 04—Yalobusha	2	4	0
497	Mississippi 05—Washington	2	4	0
498	Mississippi 06—Montgomery	2	4	0
499	Mississippi 07—Leake	2	4	0
500	Mississippi 08—Claiborne	2	4	0
501	Mississippi 09—Copiah	4	7	2
502	Mississippi 10—Smith	2	4	0
503	Mississippi 11—Lamar	2	4	0
504	Missouri 01—Atchison	2	4	0

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
505	Missouri 02—Harrison	23	38	13
506	Missouri 03—Schuyler	2	4	0
507	Missouri 04—De Kalb	23	38	13
508	Missouri 05—Linn	2	4	0
509	Missouri 06—Marion	2	4	0
510	Missouri 07—Saline	2	4	0
511	Missouri 08—Callaway	21	35	12
512	Missouri 09—Bates	2	4	0
513	Missouri 10—Benton	2	4	0
514	Missouri 11—Moniteau	2	4	0
515	Missouri 12—Maries	2	4	0
516	Missouri 13—Washington	14	23	8
517	Missouri 14—Barton	2	4	0
518	Missouri 15—Stone	2	4	0
519	Missouri 16—Laclede	2	4	0
520	Missouri 17—Shannon	2	4	0
521	Missouri 18—Perry	2	4	0
522	Missouri 19—Stoddard	2	4	0
523	Montana 01—Lincoln	2	4	0
524	Montana 02—Toole	2	4	0
525	Montana 03—Phillips	2	4	0
526	Montana 04—Daniels	2	4	0
527	Montana 05—Mineral	2	4	0
528	Montana 06—Deer Lodge	2	4	0
529	Montana 07—Fergus	9	15	5
530	Montana 08—Beaverhead	2	4	0
531	Montana 09—Carbon	2	4	0
532	Montana 10—Prairie	2	4	0
533	Nebraska 01—Sioux	2	4	0
534	Nebraska 02—Cherry	2	4	0
535	Nebraska 03—Knox	2	4	0
536	Nebraska 04—Grant	2	4	0
537	Nebraska 05—Boone	2	4	0
538	Nebraska 06—Keith	2	4	0
539	Nebraska 07—Hall	2	4	0
540	Nebraska 08—Chase	2	4	0
541	Nebraska 09—Adams	2	4	0
542	Nebraska 10—Cass	2	4	0
543	Nevada 01—Humboldt	2	4	0
544	Nevada 02—Lander	2	4	0
545	Nevada 03—Storey	2	4	0
546	Nevada 04—Mineral	2	4	0
547	Nevada 05—White Pine	2	4	0
548	New Hampshire 01—Coos	2	4	0
549	New Hampshire 02—Carroll	2	4	0
550	New Jersey 01—Hunterdon	2	4	0
551	New Jersey 02—Ocean	4	7	2
552	New Jersey 03—Sussex	2	4	0
553	New Mexico 01—San Juan	2	4	0
554	New Mexico 02—Colfax	2	4	0
555	New Mexico 03—Catron	2	4	0
556	New Mexico 04—Santa Fe	2	4	0
557	New Mexico 05—Grant	2	4	0
558	New Mexico 06—Lincoln	2	4	0
559	New York 01—Jefferson	2	4	0
560	New York 02—Franklin	2	4	0
561	New York 03—Chautauqua	2	4	0
562	New York 04—Yates	2	4	0
563	New York 05—Ostego	2	4	1
564	New York 06—Columbia	2	4	0
565	North Carolina 01—Cherokee	2	4	0
566	North Carolina 02—Yancey	2	4	0
567	North Carolina 03—Ashe	2	4	0

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
568	North Carolina 04—Henderson	2	4	0
569	North Carolina 05—Anson	2	4	0
570	North Carolina 06—Chatham	2	4	0
571	North Carolina 07—Rockingham	2	4	0
572	North Carolina 08—Northampton	2	4	0
573	North Carolina 09—Camden	2	4	0
574	North Carolina 10—Harnett	2	4	0
575	North Carolina 11—Hoke	2	4	0
576	North Carolina 12—Sampson	2	4	0
577	North Carolina 13—Greene	2	4	0
578	North Carolina 14—Pitt	2	4	0
579	North Carolina 15—Cabarrus	2	4	0
580	North Dakota 01—Divide	2	4	0
581	North Dakota 02—Bottineau	2	4	0
582	North Dakota 03—Barnes	2	4	0
583	North Dakota 04—Mckenzie	2	4	0
584	North Dakota 05—Kidder	2	4	0
585	Ohio 01—Williams	2	4	0
586	Ohio 02—Sandusky	2	4	0
587	Ohio 03—Ashtabula	2	4	0
588	Ohio 04—Mercer	2	4	0
589	Ohio 05—Hancock	2	4	0
590	Ohio 06—Morrow	2	4	0
591	Ohio 07—Tuscarawas	2	4	0
592	Ohio 08—Clinton	2	4	0
593	Ohio 09—Ross	2	4	0
594	Ohio 10—Perry	2	4	0
595	Ohio 11—Columbiana	2	4	0
596	Oklahoma 01—Cimarron	2	4	0
597	Oklahoma 02—Harper	2	4	0
598	Oklahoma 03—Grant	2	4	0
599	Oklahoma 04—Nowata	2	4	0
600	Oklahoma 05—Roger Mills	2	4	0
601	Oklahoma 06—Seminole	2	4	1
602	Oklahoma 07—Beckham	2	4	0
603	Oklahoma 08—Jackson	2	4	0
604	Oklahoma 09—Garvin	2	4	0
605	Oklahoma 10—Haskell	2	4	0
606	Oregon 01—Clatsop	2	4	0
607	Oregon 02—Hood River	2	4	0
608	Oregon 03—Umatilla	2	4	0
609	Oregon 04—Lincoln	9	15	5
610	Oregon 05—Coos	2	4	0
611	Oregon 06—Crook	2	4	0
612	Pennsylvania 01—Crawford	2	4	0
613	Pennsylvania 02—McKean	2	4	0
614	Pennsylvania 03—Potter	2	4	0
615	Pennsylvania 04—Bradford	2	4	0
616	Pennsylvania 05—Wayne	2	4	0
617	Pennsylvania 06—Lawrence	2	4	0
618	Pennsylvania 07—Jefferson	2	4	0
619	Pennsylvania 08—Union	2	4	0
620	Pennsylvania 09—Greene	2	4	0
621	Pennsylvania 10—Bedford	2	4	0
622	Pennsylvania 11—Huntingdon	2	4	1
623	Pennsylvania 12—Lebanon	2	4	0
624	Rhode Island 01—Newport	2	4	0
625	South Carolina 01—Oconee	2	4	0
626	South Carolina 02—Laurens	2	4	0
627	South Carolina 03—Cherokee	2	4	0
628	South Carolina 04—Chesterfield	2	4	0
629	South Carolina 05—Georgetown	2	4	0
630	South Carolina 06—Clarendon	2	4	0

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
631	South Carolina 07—Calhoun	2	4	0
632	South Carolina 08—Hampton	2	4	0
633	South Carolina 09—Lancaster	2	4	0
634	South Dakota 01—Harding	2	4	0
635	South Dakota 02—Corson	2	4	0
636	South Dakota 03—McPherson	2	4	0
637	South Dakota 04—Marshall	2	4	0
638	South Dakota 05—Custer	2	4	0
639	South Dakota 06—Haakon	2	4	0
640	South Dakota 07—Sully	2	4	0
641	South Dakota 08—Kingsbury	2	4	0
642	South Dakota 09—Hanson	2	4	0
643	Tennessee 01—Lake	2	4	0
644	Tennessee 02—Cannon	2	4	0
645	Tennessee 03—Macon	2	4	1
646	Tennessee 04—Hamblen	11	18	6
647	Tennessee 05—Fayette	2	4	0
648	Tennessee 06—Giles	2	4	0
649	Tennessee 07—Bledsoe	4	7	2
650	Tennessee 08—Johnson	2	4	0
651	Tennessee 09—Maury	2	4	0
652	Texas 01—Dallam	2	4	0
653	Texas 02—Hansford	2	4	0
654	Texas 03—Parmer	2	4	0
655	Texas 04—Briscoe	2	4	1
656	Texas 05—Hardeman	2	4	0
657	Texas 06—Jack	31	51	18
658	Texas 07—Fannin	31	51	18
659	Texas 08—Gaines	2	4	0
660	Texas 09—Runnels	2	4	0
661	Texas 10—Navarro	2	4	0
662	Texas 11—Cherokee	33	54	19
663	Texas 12—Hudspeth	2	4	0
664	Texas 13—Reeves	2	4	0
665	Texas 14—Loving	2	4	0
666	Texas 15—Concho	2	4	0
667	Texas 16—Burleson	33	54	19
668	Texas 17—Newton	33	54	19
669	Texas 18—Edwards	4	7	2
670	Texas 19—Atascosa	2	4	0
671	Texas 20—Wilson	33	54	19
672	Texas 21—Chambers	33	54	19
673	Utah 01—Box Elder	24	39	14
674	Utah 02—Morgan	16	26	9
675	Utah 03—Juab	2	4	0
676	Utah 04—Beaver	2	4	0
677	Utah 05—Carbon	2	4	0
678	Utah 06—Piute	2	4	0
679	Vermont 01—Franklin	2	4	0
680	Vermont 02—Addison	2	4	0
681	Virginia 01—Lee	2	4	0
682	Virginia 02—Tazewell	2	4	0
683	Virginia 03—Giles	2	4	0
684	Virginia 04—Bedford	2	4	1
685	Virginia 05—Bath	2	4	0
686	Virginia 06—Highland	2	4	1
687	Virginia 07—Buckingham	2	4	0
688	Virginia 08—Amelia	2	4	0
689	Virginia 09—Greensville	2	4	0
690	Virginia 10—Frederick	2	4	0
691	Virginia 11—Madison	2	4	1
692	Virginia 12—Caroline	2	4	0
693	Washington 01—Clallam	11	18	6

APPENDIX B.—NOTICE OF CAPACITY REQUIREMENTS BY MSA/RSA FOR TELECOMMUNICATIONS CARRIERS PROVIDING CELLULAR SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MSA/RSA*.]

MSA/RSA No.	MSA/RSA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Historical experience
694	Washington 02—Okanogan	2	4	0
695	Washington 03—Ferry	2	4	0
696	Washington 04—Grays Harbor	2	4	0
697	Washington 05—Kittitas	2	4	0
698	Washington 06—Pacific	2	4	0
699	Washington 07—Skamania	2	4	0
700	Washington 08—Whitman	2	4	0
701 West	Virginia 01—Mason	2	4	0
702 West	Virginia 02—Wetzel	2	4	0
703 West	Virginia 03—Monongalia	2	4	0
704 West	Virginia 04—Grant	2	4	0
705 West	Virginia 05—Tucker	2	4	0
706 West	Virginia 06—Lincoln	2	4	0
707 West	Virginia 07—Raleigh	2	4	0
708	Wisconsin 01—Burnett	2	4	0
709	Wisconsin 02—Bayfield	2	4	0
710	Wisconsin 03—Vilas	2	4	0
711	Wisconsin 04—Marinette	2	4	0
712	Wisconsin 05—Pierce	2	4	0
713	Wisconsin 06—Trempealeau	2	4	0
714	Wisconsin 07—Wood	2	4	0
715	Wisconsin 08—Vernon	2	4	0
716	Wisconsin 09—Columbia	4	7	2
717	Wisconsin 10—Door	2	4	0
718	Wyoming 01—Park	2	4	0
719	Wyoming 02—Sheridan	2	4	0
720	Wyoming 03—Lincoln	2	4	0
721	Wyoming 04—Niobrara	2	4	0
722	Wyoming 05—Converse	2	4	0
723	Puerto Rico 01—Rincon	30	49	17
724	Puerto Rico 02—Adjuntas	30	49	17
725	Puerto Rico 03—Ciales	30	49	17
726	Puerto Rico 04—Aibonito	30	49	17
727	Puerto Rico 05—Ceiba	30	49	17
728	Puerto Rico 06—Vieques	30	49	17
729	Puerto Rico 07—Culebra	30	49	17
730	Virgin Islands 01—St. Thomas Island	2	4	0
731	Virgin Islands 02—St. Croix	2	4	0
732	Guam 01—Guam	2	4	0
733	American Samoa 01—American Samoa	2	4	0
734	Northern Mariana Islands 01—Northern Mariana Islands	2	4	0

*The acronym MSA/RSA is used for cellular service licensing purposes. The Federal Communications Commission (FCC) designated 734 markets; 306 Metropolitan Statistical Area (''MSAs'') and 428 Rural Statistical Areas (''RSAs''), based on population density.''

APPENDIX C.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (MTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MTA*.]

MTA No.	MTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
1	New York	183	297	107
2	Los Angeles-San Diego	161	261	94
3	Chicago	48	78	28
4	San Francisco-Oakland-San Jose	43	70	25
5	Detroit	48	78	28
6	Charlotte-Greensboro-Greenville-Raleigh	12	20	7

APPENDIX C.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (MTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within an MTA*.]

MTA No.	MTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
7	Dallas-Ft Worth	70	114	41
8	Boston-Providence	52	85	30
9	Philadelphia	53	86	31
10	Washington-Baltimore	70	114	41
11	Atlanta	12	20	7
12	Minneapolis-St Paul	33	54	19
13	Tampa-St Petersburg-Orlando	98	159	57
14	Houston	84	137	49
15	Miami-Ft Lauderdale	84	137	49
16	Cleveland	33	54	19
17	New Orleans-Baton Rouge	21	35	12
18	Cincinnati-Dayton	7	12	4
19	St Louis	35	57	20
20	Milwaukee	4	7	2
21	Pittsburgh	16	26	9
22	Denver	45	73	26
23	Richmond-Norfolk	2	4	1
24	Seattle (Excluding Alaska)	14	23	8
25	Puerto Rico-U.S. Virgin Islands	35	57	20
26	Louisville-Lexington-Evansville	7	12	4
27	Phoenix	82	133	48
28	Memphis-Jackson	4	7	2
29	Birmingham	6	10	3
30	Portland	18	30	10
31	Indianapolis	9	15	5
32	Des Moines-Quad Cities	9	15	5
33	San Antonio	50	82	29
34	Kansas City	23	38	13
35	Buffalo-Rochester	16	26	9
36	Salt Lake City	41	67	24
37	Jacksonville	6	10	3
38	Columbus	6	10	3
39	El Paso-Albuquerque	43	70	25
40	Little Rock	2	4	1
41	Oklahoma City	6	10	3
42	Spokane-Billings	9	15	5
43	Nashville	6	10	3
44	Knoxville	14	23	8
45	Omaha	12	20	7
46	Wichita	2	4	0
47	Honolulu	7	12	4
48	Tulsa	2	4	1
49	Alaska	2	4	0
50	Guam-Northern Mariana Islands	2	4	0
51	American Samoa	2	4	0

*MTAs are Rand McNally Major Trading Areas. Areas defined by the FCC for the purpose of issuing licenses for PCS. Based on Material

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a BTA*.]

BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
1	Aberdeen, SD	2	4	0
2	Aberdeen, WA	2	4	0

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a BTA*.]

BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
3	Abilene, TX	4	7	2
4	Ada, OK	2	4	0
5	Adrian, MI	2	4	0
6	Albany-Tifton, GA	2	4	1
7	Albany-Schenectady, NY	2	4	1
8	Albuquerque, NM	7	12	4
9	Alexandria, LA	2	4	0
10	Allentown-Bethlehem-Easton, PA	23	38	13
11	Alpena, MI	2	4	0
12	Altoona, PA	2	4	1
13	Amarillo, TX	2	4	1
14	Anchorage, AK	2	4	0
15	Anderson, IN	7	12	4
16	Anderson, SC	11	18	6
17	Anniston, AL	6	10	3
18	Appleton-Oshkosh, WI	2	4	0
19	Ardmore, OK	2	4	0
20	Asheville-Hendersonville, NC	2	4	0
21	Ashtabula, OH	2	4	0
22	Athens, GA	12	20	7
23	Athens, OH	2	4	0
24	Atlanta, GA	12	20	7
25	Atlantic City, NJ	4	7	2
26	Augusta, GA	11	18	6
27	Austin, TX	36	59	21
28	Bakersfield, CA	2	4	1
29	Baltimore, MD	70	114	41
30	Bangor, ME	2	4	0
31	Bartlesville, OK	2	4	0
32	Baton Rouge, LA	2	4	0
33	Battle Creek, MI	7	12	4
34	Beaumont-Port Arthur, TX	33	54	19
35	Beckley, WV	2	4	0
36	Bellingham, WA	11	18	6
37	Bemidji, MN	2	4	1
38	Bend, OR	2	4	0
39	Benton Harbor, MI	2	4	0
40	Big Spring, TX	2	4	0
41	Billings, MT	9	15	5
42	Biloxi-Gulfport-Pascagoula, MS	2	4	0
43	Binghamton, NY	2	4	0
44	Birmingham, AL	6	10	3
45	Bismarck, ND	2	4	0
46	Bloomington, IL	2	4	0
47	Bloomington-Bedford, IN	7	12	4
48	Bluefield, WV	2	4	0
49	Blytheville, AR	2	4 0	
50	Boise-Nampa, ID	2	4	0
51	Boston, MA	40	65	23
52	Bowling Green-Glasgow, KY	2	4	0
53	Bozeman, MT	2	4	0
54	Brainerd, MN	2	4	1
55	Bremerton, WA	11	18	6
56	Brownsville-Harlingen, TX	9	15	5
57	Brownwood, TX	2	4	0
58	Brunswick, GA	2	4	0
59	Bryan-College Station, TX	33	54	19
60	Buffalo-Niagara Falls, NY	12	20	7
61	Burlington, IA	2	4	0
62	Burlington, NC	2	4	0
63	Burlington, VT	2	4	0
64	Butte, MT	2	4	0
65	Canton-New Philadelphia, OH	28	46	16

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a BTA*.]

BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
66	Cape Girardeau-Sikeston, MO	2	4	0
67	Carbondale-Marion, IL	2	4	0
68	Carlsbad, NM	2	4	0
69	Casper-Gillette, WY	2	4	0
70	Cedar Rapids, IA	2	4	0
71	Champaign-Urbana, IL	2	4	0
72	Charleston, SC	2	4	0
73	Charleston, WV	2	4	1
74	Charlotte-Gastonia, NC	2	4	1
75	Charlottesville, VA	2	4	1
76	Chattanooga, TN	11	18	6
77	Cheyenne, WY	2	4	0
78	Chicago, IL	48	78	28
79	Chio-Oroville, CA	2	4	0
80	Chillicothe, OH	2	4	0
81	Cincinnati, OH	7	12	4
82	Clarksburg-Elkins, WV	2	4	0
83	Clarksville, TN—Hopkinsville, KY	4	7	2
84	Cleveland-Akron, OH	28	46	16
85	Cleveland, TN	4	7	2
86	Clinton, IA—Sterling, IL	9	15	5
87	Clovis, NM	2	4	0
88	Coffeyville, KS	2	4	0
89	Colorado Springs, CO	33	54	19
90	Columbia, MO	21	35	12
91	Columbia, SC	2	4	0
92	Columbus, GA	2	4	1
93	Columbus, IN	7	12	4
94	Columbus-Starkville, MS	2	4	0
95	Columbus, OH	6	10	3
96	Cookeville, TN	2	4	1
97	Coos Bay-North Bend, OR	2	4	0
98	Corbin, KY	6	10	3
99	Corpus Christi, TX	33	54	19
100	Cumberland, MD	2	4	0
101	Dallas-Ft Worth, TX	55	90	32
102	Dalton, GA	2	4	0
103	Danville, IL	2	4	0
104	Danville, VA	2	4	0
105	Davenport, IA—Moline, IL	2	4	0
106	Dayton-Springfield, OH	2	4	0
107	Daytona Beach, FL	11	18	6
108	Decatur, AL	2	4	0
109	Decatur-Effingham, IL	2	4	0
110	Denver, CO	40	65	23
111	Des Moines, IA	4	7	2
112	Detroit, MI	48	78	28
113	Dickinson, ND	2	4	0
114	Dodge City, KS	2	4	0
115	Dothan-Enterprise, AL	2	4	0
116	Dover, DE	41	67	24
117	Du Bois-Clearfield, PA	2	4	0
118	Dubuque, IA	9	15	5
119	Duluth, MN	2	4	1
120	Dyersburg-Union City, TN	2	4	0
121	Eagle Pass-Del Rio, TX	4	7	2
122	East Liverpool-Salem, OH	2	4	0
123	Eau Claire, WI	2	4	0
124	El Centro-Calexico, CA	2	4	1
125	El Dorado-Magnolia-Camden, AR	2	4	0
126	Elkhart, IN	2	4	0
127	Elmira-Corning-Hornell, NY	2	4	0
128	El Paso, TX	18	30	10

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a BTA*.]

BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
129	Emporia, KS	2	4	0
130	Enid, OK	2	4	0
131	Erie, PA	24	39	14
132	Escanaba, MI	2	4	0
133	Eugene-Springfleld, OR	11	18	6
134	Eureka, CA	2	4	0
135	Evansville, IN	2	4	0
136	Fairbanks, AK	2	4	0
137	Fairmont, WV	2	4	0
138	Fargo, ND	2	4	1
139	Farmington, NM—Durango, CO	33	54	19
140	Fayetteville-Springdale-Rogers, AR	2	4	0
141	Fayetteville-Lumberton, NC	2	4	0
142	Fergus Falls, MN	2	4	1
143	Findlay-Tiffin, OH	2	4	0
144	Flagstaff, AZ	2	4	0
145	Flint, MI	38	62	22
146	Florence, AL	4	7	2
147	Florence, SC	2	4	0
148	Fond du Lac, WI	4	7	2
149	Ft. Collins-Loveland, CO	43	70	25
150	Ft Dodge, IA	2	4	0
151	Ft. Myers, FL	84	137	49
152	Ft. Pierce-Vero Beach-Stuart, FL	82	133	48
153	Ft. Smith, AR	2	4	0
154	Ft. Walton Beach, FL	2	4	1
155	Ft. Wayne, IN	7	12	4
156	Fredericksburg, VA	2	4	1
157	Fresno, CA	2	4	0
158	Gadsden, AL	6	10	3
159	Gainesville, FL	2	4	0
160	Gainesville, GA	2	4	0
161	Galesburg, IL	2	4	0
162	Gallup, NM	2	4	0
163	Garden City, KS	2	4	0
164	Glens Falls, NY	2	4	0
165	Goldsboro-Kinston, NC	2	4	0
166	Grand Forks, ND	2	4	1
167	Grand Island-Kearney, NE	2	4	0
168	Grand Junction, CO	2	4	0
169	Grand Rapids, MI	18	30	10
170	Great Bend, KS	2	4	0
171	Great Falls, MT	9	15	5
172	Greeley, CO	43	70	25
173	Green Bay, WI	2	4	0
174	Greensboro-Winston-Salem-High Point, NC	2	4	0
175	Greenville-Greenwood, MS	2	4	0
176	Greenville-Washington, NC	2	4	0
177	Greenville-Spartanburg, SC	2	4	1
178	Greenwood, SC	2	4	0
179	Hagerstown, MD—Chambersburg, PA—Martinsburg, WV	2	4	0
180	Hammond, LA	2	4	0
181	Harrisburg, PA	4	7	2
182	Harrison, AR	2	4	0
183	Harrisonburg,VA	2	4	1
184	Hartford, CT	2	4	1
185	Hastings, NE	2	4	0
186	Hattiesburg, MS	4	7	2
187	Hays, KS	2	4	0
188	Helena, MT	2	4	0
189	Hickory-Lenoir-Morganton, NC	2	4	0
190	Hilo, HI	4	7	2
191	Hobbs, NM	2	4	0

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a BTA*.]

BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
192	Honolulu, HI	7	12	4
193	Hot Springs, AR	2	4	0
194	Houghton, MI	2	4	0
195	Houma-Thibodaux, LA	2	4	0
196	Houston, TX	84	137	49
197	Huntington, WV—Ashland, KY	2	4	1
198	Huntsville, AL	2	4	0
199	Huron, SD	2	4	0
200	Hutchinson, KS	2	4	0
201	Hyannis, MA	11	18	6
202	Idaho Falls, ID	11	18	6
203	Indiana, PA	2	4	0
204	Indianapolis, IN	9	15	5
205	Iowa City, IA	2	4	0
206	Iron Mountain, MI	2	4	0
207	Ironwood, MI	2	4	0
208	Ithaca, NY	2	4	0
209	Jackson, MI	2	4	0
210	Jackson, MS	4	7	2
211	Jackson, TN	2	4	0
212	Jacksonville, FL	6	10	3
213	Jacksonville, IL	2	4	0
214	Jacksonville, NC	2	4	0
215	Jamestown-Dunkirk, NY-Warren, PA	2	4	0
216	Janesville-Beloit, WI	4	7	2
217	Jefferson City, MO	21	35	12
218	Johnstown, PA	16	26	9
219	Jonesboro-Paragould, AR	2	4	0
220	Joplin, MO—Miami, OK	2	4	0
221	Juneau-Ketchikan, AK	2	4	0
222	Kahului-Wailuku-Lahaina, HI	4	7	2
223	Kalamazoo, MI	7	12	4
224	Kalispell, MT	2	4	0
225	Kankakee, IL	48	78	28
226	Kansas City, MO	23	38	13
227	Keene, NH	2	4	0
228	Kennewick-Pasco-Richland, WA	2	4	0
229	Kingsport-Johnston City, TN—Bristol, VA/TN	11	18	6
230	Kirksville, MO	23	38	13
231	Klamath Falls, OR	2	4	0
232	Knoxville, TN	12	20	7
233	Kokomo-Logansport, IN	7	12	4
234	La Crosse, WI—Winona, MN	2	4	0
235	Lafayette, IN	7	12	4
236	Lafayette-New Iberia, LA	2	4	0
237	La Grange, GA	2	4	0
238	Lake Charles, LA	2	4	0
239	Lakeland-Winter Haven, FL	19	31	11
240	Lancaster, PA	4	7	2
241	Lansing, MI	16	26	9
242	Laredo, TX	4	7	2
243	La Salle-Peru-Ottawa-Streator, IL	2	4	0
244	Las Cruces, NM	7	12	4
245	Las Vegas, NV	50	82	29
246	Laurel, MS	2	4	0
247	Lawrence, KS	23	38	13
248	Lawton-Duncan, OK	2	4	0
249	Lebanon-Claremont, NH	2	4	0
250	Lewiston-Moscow, ID	2	4	0
251	Lewiston-Auburn, ME	2	4	0
252	Lexington, KY	6	10	3
253	Liberal, KS	2	4	0
254	Lihue, HI	4	7	2

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a BTA*.]

BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
255	Lima, OH	16	26	9
256	Lincoln, NE	2	4	0
257	Little Rock, AR	2	4	1
258	Logan, UT	24	39	14
259	Logan, WV	2	4	0
260	Longview-Marshall, TX	55	90	32
261	Longview, WA	2	4	0
262	Los Angeles, CA	103	167	60
263	Louisville, KY	7	12	4
264	Lubbock, TX	11	18	6
265	Lufkin-Nacogdoches, TX	33	54	19
266	Lynchburg, VA	2	4	0
267	McAlester, OK	2	4	1
268	McAllen, TX	12	20	7
269	McComb-Brookhaven, MS	4	7	2
270	McCook, NE	2	4	0
271	Macon-Warner Robins, GA	11	18	6
272	Madison, WI	4	7	2
273	Madisonville, KY	2	4	0
274	Manchester-Nashua-Concord, NH	2	4	0
275	Manhattan-Junction City, KS	2	4	0
276	Manitowoc, WI	2	4	0
277	Mankato-Fairmont, MN	2	4	0
278	Mansfield, OH	2	4	0
279	Marinette, WI—Menominee, MI	2	4	0
280	Marion, IN	7	12	4
281	Marion, OH	2	4	0
282	Marquette, MI	2	4	0
283	Marshalltown, IA	2	4	0
284	Martinsville, VA	2	4	1
285	Mason City, IA	2	4	0
286	Mattoon, IL	2	4	0
287	Meadville, PA	2	4	0
288	Medford-Grants Pass, OR	9	15	5
289	Melbourne-Titusville, FL	14	23	8
290	Memphis, TN	4	7	2
291	Merced, CA	2	4	1
292	Meridian, MS	2	4	0
293	Miami-Ft. Lauderdale, FL	82	133	48
294	Michigan City-La Porte, IN	7	12	4
295	Middlesboro-Harlan, KY	6	10	3
296	Midland, TX	2	4	0
297	Milwaukee, WI	4	7	2
298	Minneapolis-St. Paul, MN	33	54	19
299	Minot, ND	2	4	0
300	Missoula, MT	2	4	0
301	Mitchell, SD	2	4	0
302	Mobile, AL	2	4	1
303	Modesto, CA	6	10	3
304	Monroe, LA	2	4	0
305	Montgomery, AL	2	4	0
306	Morgantown, WV	2	4	0
307	Mt. Pleasant, MI	2	4	0
308	Mt. Vernon-Centralia, IL	2	4	0
309	Muncie, IN	7	12	4
310	Muskegon, MI	16	26	9
311	Muskogee, OK	2	4	1
312	Myrtle Beach, SC	2	4	0
313	Naples, FL	38	62	22
314	Nashville, TN	6	10	3
315	Natchez, MS	2	4	0
316	New Bern, NC	2	4	0
317	New Castle, PA	2	4	0

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

[Numbers represent historical simultaneous interceptions and an estimation of the simultaneous requirement of pen register, trap and trace, and call content interceptions that may be conducted anywhere within a BTA*.]

BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
318	New Haven-Waterbury-Meriden, CT	2	4	1
319	New London-Norwich, CT	4	7	2
320	New Orleans, LA	21	35	12
321	New York, NY	181	294	106
322	Nogales, AZ	12	20	7
323	Norfolk, NE	2	4	0
324	Norfolk-Virginia Beach-Newport News-Hampton, VA	2	4	0
325	North Platte, NE	2	4	0
326	Ocala, FL	14	23	8
327	Odessa, TX	7	12	4
328	Oil City-Franklin, PA	2	4	0
329	Oklahoma City, OK	6	10	3
330	Olean, NY—Bradford, PA	2	4	0
331	Olympia-Centralia, WA	11	18	6
332	Omaha, NE	12	20	7
333	Oneonta, NY	2	4	1
334	Opelika-Auburn, AL	6	10	3
335	Orangeburg, SC	2	4	0
336	Orlando, FL	14	23	8
337	Ottumwa, IA	2	4	0
338	Owensboro, KY	2	4	0
339	Paducah-Murray-Mayfield, KY	2	4	0
340	Panama City, FL	2	4	1
341	Paris, TX	31	51	18
342	Parkersburg, WV—Marietta, OH	2	4	1
343	Pensacola, FL	2	4	1
344	Peoria, IL	2	4	0
345	Petoskey, MI	2	4	0
346	Philadelphia, PA—Wilmington, DE—Trenton, NJ	31	51	18
347	Phoenix, AZ	48	78	28
348	Pine Bluff, AR	2	4	1
349	Pittsburg-Parsons, KS	2	4	0
350	Pittsburgh, PA	16	26	9
351	Pittsfield, MA	2	4	1
352	Plattsburgh, NY	2	4	0
353	Pocatello, ID	2	4	0
354	Ponca City, OK	2	4	0
355	Poplar Bluff, MO	2	4	0
356	Port Angeles, WA	11	18	6
357	Portland-Brunswick, ME	2	4	0
358	Portland, OR	18	30	10
359	Portsmouth, OH	2	4	0
360	Pottsville, PA	2	4	0
361	Poughkeepsie-Kingston, NY	2	4	1
362	Prescott, AZ	2	4	0
363	Presque Isle, ME	2	4	0
364	Providence-Pawtucket, RI—New Bedford-Fall River, MA	4	7	2
365	Provo-Orem, UT	14	23	8
366	Pueblo, CO	33	54	19
367	Quincy, IL—Hannibal, MO	2	4	0
368	Raleigh-Durham, NC	4	7	2
369	Rapid City, SD	2	4	0
370	Reading, PA	21	35	12
371	Redding, CA	2	4	0
372	Reno, NV	2	4	1
373	Richmond, IN	7	12	4
374	Richmond-Petersburg, VA	2	4	1
375	Riverton, WY	2	4	0
376	Roanoke, VA	2	4	1
377	Roanoke Rapids, NC	2	4	0
378	Rochester-Austin-Albert Lea, MN	23	38	13
379	Rochester, NY	7	12	4
380	Rockford, IL	9	15	5

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

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BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
381	Rock Springs, WY	2	4	0
382	Rocky Mount-Wilson, NC	2	4	0
383	Rolla, MO	2	4	0
384	Rome, GA	11	18	6
385	Roseburg, OR	2	4	0
386	Roswell, NM	2	4	0
387	Russellville, AR	2	4	0
388	Rutland-Bennington, VT	2	4	0
389	Sacramento, CA	6	10	3
390	Saginaw-Bay City, MI	16	26	9
391	St. Cloud, MN	23	38	13
392	St. George, UT	2	4	0
393	St. Joseph, MO	23	38	13
394	St. Louis, MO	23	38	13
395	Salem-Albany-Corvallis, OR	18	30	10
396	Salina, KS	2	4	0
397	Salinas-Monterey, CA	19	31	11
398	Salisbury, MD	28	46	16
399	Salt Lake City-Ogden, UT	41	67	24
400	San Angelo, TX	4	7	2
401	San Antonio, TX	43	70	25
402	San Diego, CA	23	38	13
403	Sandusky, OH	2	4	0
404	San Francisco-Oakland-San Jose, CA	35	57	20
405	San Luis Obispo, CA	19	31	11
406	Santa Barbara-Santa Maria, CA	19	31	11
407	Santa Fe, NM	2	4	0
408	Sarasota-Bradenton, FL	19	31	11
409	Sault Ste. Marie, MI	2	4	0
410	Savannah, GA	2	4	1
411	Scottsbluff, NE	2	4	0
412	Scranton-Wilkes Barre-Hazleton, PA	2	4	0
413	Seattle-Tacoma, WA	14	23	8
414	Sedalia, MO	2	4	0
415	Selma, AL	2	4	0
416	Sharon, PA	6	10	3
417	Sheboygan, WI	4	7	2
418	Sherman-Denison, TX	31	51	18
419	Shreveport, LA	33	54	19
420	Sierra Vista-Douglas, AZ	12	20	7
421	Sioux City, IA	2	4	0
422	Sioux Falls, SD	2	4	0
423	Somerset, KY	2	4	0
424	South Bend-Mishawaka, IN	7	12	4
425	Spokane, WA	2	4	0
426	Springfield, IL	2	4	0
427	Springfield-Holyoke, MA	2	4	1
428	Springfield, MO	2	4	0
429	State College, PA	4	7	2
430	Staunton-Waynesboro, VA	2	4	1
431	Steubenville, OH—Weirton, WV	2	4	1
432	Stevens Point-Marshfield-Wisconsin Rapids, WI	2	4	0
433	Stillwater, OK	2	4	0
434	Stockton, CA	4	7	2
435	Stroudsburg, PA	2	4	0
436	Sumter, SC	2	4	0
437	Sunbury-Shamokin, PA	2	4	0
438	Syracuse, NY	7	12	4
439	Tallahassee, FL	2	4	1
440	Tampa-St. Petersburg-Clearwater, FL	86	140	50
441	Temple-Killeen, TX	2	4	1
442	Terre Haute, IN	7	12	4
443	Texarkana, TX/AR	31	51	18

APPENDIX D.—NOTICE OF CAPACITY REQUIREMENTS BY PCS MARKET (BTA) FOR TELECOMMUNICATIONS CARRIERS PROVIDING PCS SERVICES—Continued

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BTA No.	BTA market name	Market requirement		
		Estimated actual interceptions that may be conducted	Estimated maximum interceptions that may be conducted	Calculated historical experience
444	Toledo, OH	16	26	9
445	Topeka, KS	23	38	13
446	Traverse City, MI	2	4	0
447	Tucson, AZ	60	98	35
448	Tulsa, OK	2	4	1
449	Tupelo-Corinth, MS	2	4	0
450	Tuscaloosa, AL	6	10	3
451	Twin Falls, ID	11	18	6
452	Tyler, TX	55	90	32
453	Utica-Rome, NY	2	4	0
454	Valdosta, GA	2	4	0
455	Vicksburg, MS	2	4	0
456	Victoria, TX	33	54	19
457	Vincennes-Washington, IN	2	4	0
458	Visalia-Porterville-Hanford, CA	2	4	0
459	Waco, TX	6	10	3
460	Walla Walla, WA—Pendelton, OR	2	4	0
461	Washington, DC	67	109	39
462	Waterloo-Cedar Falls, IA	2	4	0
463	Watertown, NY	2	4	0
464	Watertown, SD	2	4	1
465	Waterville-Augusta, ME	18	30	10
466	Wausau-Rhinelander, WI	2	4	0
467	Waycross, GA	2	4	0
468	Wenatchee, WA	2	4	0
469	West Palm Beach-Boca Raton, FL	82	133	48
470	West Plains, MO	2	4	0
471	Wheeling, WV	16	26	9
472	Wichita, KS	2	4	0
473	Wichita Falls, TX	31	51	18
474	Williamson, WV—Pikeville, KY	2	4	0
475	Williamsport, PA	2	4	0
476	Williston, ND	2	4	0
477	Willmar-Marshall, MN	2	4	1
478	Wilmington, NC	2	4	0
479	Winchester, VA	2	4	0
480	Worcester-Fitchburg-Leominster, MA	11	18	6
481	Worthington, MN	2	4	0
482	Yakima, WA	2	4	0
483	York-Hanover, PA	4	7	2
484	Youngstown-Warren, OH	6	10	3
485	Yuba City-Marysville, CA	4	7	2
486	Yuma, AZ	33	54	19
487	Zanesville-Cambridge, OH	2	4	0
488	San Juan, PR	35	57	20
489	Mayaguez-Aguadilla-Ponce, PR	31	51	18
490	Guam	2	4	0
491	US Virgin Islands	2	4	0
492	American Samoa	2	4	0
493	Northern Mariana Islands	2	4	0

•1 BTAsare Rand McNally Basic Trading Areas. Areas defined by the FCC for the purpose of issuing licenses for PCS. Based on Material

Appendix E—Methodology for Deriving Growth Factors

A. Introduction

Section 104(a) of CALEA requires the Attorney General to estimate future requirements for actual and maximum interception capacity. Law enforcement derived a baseline for these estimates from the historical interception activity in geographic areas defined as counties for wireline carriers and market service areas for wireless carriers. Growth factors were then developed and applied to the historical baseline of interception activity in order to project future actual and maximum capacity requirements.

The growth factors used in the Initial Notice of Capacity did not distinguish between services offered by wireline and wireless carriers. Comments on the Initial Notice, however, recommended that, because of the differences between these

technologies, separate capacity requirements should be established, and law enforcement agreed. As a result of establishing separate wireline and wireless capacity requirements, law enforcement considered it appropriate to also establish separate growth rates for each technology. The methodology for developing growth factors for wireline and wireless services is the subject of this appendix.

B. Background

In the Initial Notice of Capacity a multi variable linear regression model was used to project growth. This technique predicts one value, the dependent variable, in terms of one or more other variables. The Initial Notice of Capacity used a regression model to predict court orders for Title III interceptions as a function of the following predictors: population, wireline access lines, wireless subscribers, law enforcement manpower and violent crime. Although Title III court orders do not identify the number of interceptions associated with each order, or the vastly greater number of pen register and trap and trace interceptions, they were used for projecting future interception activity because of their extensive historical record of one aspect of electronic surveillance. In addition, a change in the number of Title III court orders is a likely indicator of changes in interception activity. This method, which combined wireless and wireline growth, yielded interception growth rates of 54 percent from 1994 to 1998 for actual capacity, and 130 percent from 1994 to 2004 for maximum capacity.

Initially, law enforcement tried to construct separate multi variable linear regression models for wireless and wireline services but could not produce statistically acceptable models. Consequently, it formulated a new statistical approach, which is detailed below.

C. Formulating Growth Projections for the Second Notice of Capacity

The formulation of the capacity growth projections for the Second Notice of Capacity is stated in terms of four growth factors: $A_{wireline}$, $A_{wireless}$, $M_{wireline}$, and $M_{wireless}$. The ''A'' factors are multipliers that were used to scale historical interception data to calculate the future actual capacity requirements. The ''M'' factors are multipliers that were used to scale the future actual capacity requirements to calculate the future maximum capacity requirements. The formulas are as follows:

Wireline:

Future Actual Capacity Requirement in a County Equals The Historical Interception Activity in the County Multiplied by $A_{wireline}$

Future Maximum Capacity Requirement in a County Equals The Future Actual Capacity Requirement in the County Multiplied by $M_{wireline}$

Wireless: Future Actual Capacity Requirement in a Market Service Area Equals The Historical Interception Activity in the Market Service Area Multiplied by $A_{wireless}$

Maximum Capacity Requirement in a Market Service Area Equals The Future Actual Capacity Requirement in the Market Service Area Multiplied by $M_{wireless}$

All the resulting capacity requirements were rounded up to the next whole number.

The above formulation was deemed appropriate for two reasons. First, it was responsive to the recommendation that separate requirements be established for services offered by wireline and wireless carriers. Second, it reflected the different dynamics and growth trends of the wireline and wireless sectors (e.g., the projected growth in wireline access lines for the next 10 years is 3.5 percent annually, while the projected growth in wireless subscribers for the next 10 years is 12.0 percent annually).

There were four major steps in the approach used: (a) Identifying data sources that would be appropriate for making growth projections; (b) processing the data from the sources selected to yield data sets that could be used to determine separate wireline and wireless growth projections; (c) calculating the wireline growth projection factors, $A_{wireline}$ and $M_{wireline}$, from the wireline data sets; and (d) calculating the wireless growth projection factors, $A_{wireless}$ and $M_{wireless}$, from the wireless data sets.

D. Step 1: Evaluation of Data Sources

Four criteria were used to evaluate the soundness of data sources for growth projection purposes: (a) comprehensiveness, meaning the data should encompass Title III interceptions and interceptions using pen register and trap and trace (PR/TT) devices, and it should cover all law enforcement agencies; (b) reliability, meaning the data should be collected and reported in a structured manner by a reliable source so that projections have a credible foundation; (c) availability, meaning the data should be available for multiple years in order to establish a trend sufficient for making projections; and (d) separability, meaning the data should be separable into wireline and wireless data sets so that distinct wireline and wireless growth projections can be developed.

Three data sources were identified as candidates: (a) historical records of interception activity from January 1, 1993, to March 1, 1995, gathered in a survey of law enforcement and the telecommunications industry; (b) data on Title III court orders extracted from the *Wiretap Reports* published by the Administrative Office of the United States Courts during the period from 1980 to 1995; and (c) data on PR/TT court orders taken from Department of Justice (DOJ) reports covering the period between 1987 and 1995.

(1) Historical Survey

When considered in the context of the four evaluation criteria, the historical records of interception activity did not provide a sufficient basis for making growth projections. Although comprehensive, separable, and reliable, the records did not rate well against the availability criterion. They covered only a 26-month period, which was insufficient for establishing a trend that could be used confidently for making projections. One year's worth of change in interception activity was observable from these records, but that was insufficient to make the 4 year and 10 year forecasts needed for deriving actual and maximum capacity requirements.

(2) Wiretap Report Data

The *Wiretap Reports* rated well against the availability, reliability, and separability criteria. Wiretap Reports dating from 1980 provided 16 years of data. They are also a highly reliable source of data compiled annually under a consistent recording and reporting approach. Furthermore, the Wiretap Report data could be sorted and analyzed to yield separate wireline and wireless data sets. However, the Wiretap Reports did not measure well against the comprehensiveness criterion. The Wiretap Reports covered only Title III court orders and did not include the number of line-related interceptions associated with each court order or data on PR/TT interceptions.

(3) DOJ Pen Register/Trap and Trace Reports

The DOJ PR/TT reports had two shortcomings. First, unlike the Wiretap Report data, the information in the DOJ PR/TT reports was not immediately separable into wireline and wireless data sets. Second, like the Wiretap Reports, the DOJ PR/TT reports did not precisely indicate the number of interceptions associated with each court order. In addition, the DOJ PR/TT reports covered only a subset of law enforcement agencies, namely, the Federal Bureau of Investigation, the Drug Enforcement Agency, the Immigration and Naturalization Service, the United States Marshals Service, and the DOJ Inspector General's Office. Therefore, projections based solely on data in the DOJ PR/TT reports would not capture interception activity across all federal, state, and local law enforcement agencies. Despite these limitations, the DOJ PR/TT reports were considered a reliable source because the data was collected and recorded in a structured and sustained manner during the period from 1987 to 1995.

Based on the evaluation criteria, none of the three candidate data sources alone could be used for deriving capacity growth projections. One of them, the historical survey of interception activity, did not provide enough years of data to support trend analysis, and there was no way to compensate for this shortcoming. But, by blending the Wiretap Report data with the DOJ PR/TT report data, the limitations of these two sources could be mitigated and an aggregate data set constructed that fared better against the evaluation criteria.

In particular, combining the Wiretap Report data and the DOJ PR/TT report data yielded an aggregate data set that covered both Title III and PR/TT court orders; and, therefore, it was comprehensive in coverage of interception court orders. However, it was not comprehensive in coverage of law enforcement because the DOJ PR/TT reports covered only a subset of law enforcement agencies, and there was no way to compensate for this deficiency.

With respect to the other evaluation criteria, the aggregate data set was reliable because the two constituent data sources themselves were reliable. It met the availability criterion because the two constituent data sources covered 16 and 9

consecutive years, respectively. Finally, by applying an assumption based on the *Wiretap Report* data, the DOJ PR/TT report data could be separated into wireline and wireless data sets. As a result, the aggregate data set itself became separable.

E. Step 2: Data Sorting and Analyzing

Before any growth projections could be made, the data in the *Wiretap Reports* and the DOJ PR/TT reports had to be sorted into separate wireline and wireless data sets.

For the *Wiretap Reports,* available information from each recorded court order was examined. The *Wiretap Report* had codes specifying the type(s) of Title III electronic surveillance court order and, in general, the place(s) where these orders were executed. Because entries in the *Wiretap Reports* simply represent Title III court orders and since one court order may authorize the interception of communications on multiple lines, some entries were counted as both wireline and wireless court orders. Furthermore, some court orders (e.g., for microphone surveillance) were not counted in either category.

The DOJ PR/TT reports combined wireline and wireless PR/TT activity on an annual basis and, therefore, could not be directly separated into wireline and wireless data sets. However, the separation could be estimated based on the following assumption: on a yearly basis, the wireline/wireless composition of Title III court orders is approximately the same as the wireline/wireless composition of PR/TT court orders. Because the vast majority of Title IIIs begin as PR/TTs, this assumption seems reasonable.

F. Steps 3 and 4: Calculation of Growth Factors

Capacity growth projections were then generated using the wireline and wireless data sets that characterized Title III and PR/TT court orders. For each data set, a statistical analysis known as Best-Fit Line (BFL) was applied. BFL analysis tracks the values of one variable over time, producing an equation for a line that can be used to predict future values with a minimal amount of error. BFLs were then generated for the four data sets: wireline Title III court orders, wireline PR/TT court orders, wireless Title III court orders, and wireless PR/TT court orders.

The BFLs were used to calculate values for ''A'' and ''M''. To compute ''A'', the BFLs were used to predict values for wireline and wireless Title III and PR/TT court orders for the years 1994 and 1998. Predicted values were required for these 2 years because (a) the year 1994 was the starting point for growth because it was the last complete year for which historical records of interception activity were available and (b) the year 1998 was specified in CALEA as the year for which actual capacity requirements are to be stated. Calculations using the ratio of the 1998 and 1994 predicted values resulted in intermediate ''A'' values for the four data sets.

The respective intermediate ''A'' values were combined to derive the $A_{wireline}$ and $A_{wireless}$ composite growth factors. These composite growth factors were calculated by weighting the intermediate ''A'' values by the relative number of call-content interceptions and interceptions of call-identifying information for the 2 year period surveyed. The resulting ''A'' growth factor values serve as the multipliers that, when applied to the historical interception data, yield future actual capacity requirements. The $A_{wireline}$ value derived is 1.259, and the $A_{wireless}$ value derived is 1.707. These values correspond to compounded annual growth rates of 5.92 percent and 14.30 percent for wireline and wireless interceptions respectively, over the 4 year period 1994 through 1998.

To compute ''M'', the BFLs were used to predict values of wireline and wireless Title III and PR/TT court orders for the years 1998 to 2004. Predicted values were required for these years because (a) the year 2004 provided a 10 year period since the passage of CALEA and this was considered to be a reasonable time period for projecting maximum capacity requirements and a rational time frame for setting a stable capacity ceiling, and (b) the year 1998 was the base figure to which the multiplier ''M'' was applied to calculate the future maximum capacity values. Calculations using the ratio of the 2004 and the 1998 predicted values resulted in intermediate ''M'' values for the four data sets.

The respective intermediate ''M'' values were combined to derive the $M_{wireline}$ and $M_{wireless}$ growth factors. These composite growth factors were calculated by weighting the intermediate ''M'' values by the relative number of call-content interceptions and interceptions of call-identifying information for the 2 year period surveyed. The resulting ''M'' values are the multipliers that, when applied to the actual capacity requirements, yield future maximum capacity requirements. The $M_{wireline}$ growth factor value derived is 1. 303. and the $M_{wireless}$ growth factor value derived is 1.621. These values correspond to compounded annual growth rates of 4.55 percent and 8.38 percent for wireline and wireless interceptions, respectively, over the 6 year period of 1998 through 2004.

Appendix F—List of Parties Filing Comments

(Filed on or before March 17, 1997)

AirTouch
Ameritech
AT&T
AT&T Wireless
Bell Atlantic
Bell Atlantic NYNEX Mobile
BellSouth Telecommunications
BellSouth Cellular Corp.
Cellular Mobile Systems of St. Cloud
Cellular Telecommunications Industry Association (CTIA)
Center for Democracy and Technology (CDT), Center for National Security Studies (CNSS)
John & Christina Crowley
Earl B. Couch, Jr.
GTE
Harrisonville Telephone Company
Craig S. Klyve, State of Wisconsin, Department of Justice
LDDS WorldCom
Susan B. Long, Syracuse University
MCI
National Telephone Cooperative Association (NTCA)
Organization for the Promotion and Advancement
Pacific Telesis Group
Personal Communications Industry Association (PCIA)
Philip A. Prossnitz, Office of the State's Attorney, McHenry County Illinois
SBC Communications
Gloria Sullivan
Telecommunications Industry Association (TIA)
Teleport Communications Group
United States Telephone Association (USTA)
US West
Claire Vogel

[FR Doc. 98–6230 Filed 3–11–98; 8:45 am]
BILLING CODE 4410–02–P