

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	
Call Authentication Trust Anchor)	WC Docket No. 17-97
)	

**PETITION FOR CLARIFICATION OR RECONSIDERATION OF
THE ALARM INDUSTRY COMMUNICATIONS COMMITTEE**

Pursuant to 47. C.F.R. 1.106, the Alarm Industry Communications Committee (“AICC”) hereby files this petition for clarification or reconsideration of the Commission’s *Declaratory Ruling* in the above-captioned dockets.¹ Specifically, AICC seeks clarification that: (i) direct customer notification of call-blocking programs is necessary; (ii) that alarm company notifications are the type of emergency communication the Commission cautions voice service providers must safeguard; and (iii) that voice service providers must implement any call-blocking program in a non-discriminatory fashion. These points are discussed in order.

AICC is comprised of representatives of major associations as well as individual companies in the alarm industry.² AICC member companies protect a wide range of sensitive facilities and their occupants from fire, burglaries, sabotage and other emergencies. Protected facilities include government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, schools and universities. In addition to these commercial and governmental applications, alarm companies protect a large and ever-increasing

¹ *In re: Advanced Methods to Target and Eliminate Unlawful Robocalls*, Declaratory Ruling, FCC 19-51, CG Docket No. 17-59, WC Docket No. 17-97, rel. June 7, 2019 (“*Declaratory Ruling*”).

² A complete list of AICC’s membership is attached.

number of residences and their occupants from fire, intruders, and carbon monoxide poisoning. Alarm companies also provide medical alert services for obtaining ambulances in the event of medical emergencies. Accordingly, it is imperative that calls from alarm companies to their customers and to public safety entities, including PSAPs, emergency operations centers, or law enforcement agencies, are not blocked by any call-blocking program implemented by voice service providers, and even more so if those programs are implemented on an “opt-out” basis.

First, AICC urges the Commission to clarify that disclosing information regarding opt-out call-blocking programs by “featur[ing] such information prominently on their websites to allow consumers to research and compare the available options” is not, on its own, sufficient to ensure customers have notice and the information they need to make an informed choice about participating in such programs.³ Even for customers who have requested notifications by website, this method of notification on its own is not sufficient for an opt-out blocking program. There is simply no indication in the record that customers routinely visit their providers’ websites with enough frequency to ensure they would be timely notified of their inclusion in an opt-out call-blocking program. Instead, the Commission should clarify that disclosing information on a carrier’s website *in addition to* direct notification, such as texts, email, or inserts in customer bills, is necessary and proper.⁴

Second, the Commission should clarify that its caution to voice service providers to “avoid blocking calls from ‘public safety entities, including PSAPs, emergency operations centers, or law enforcement agencies’”⁵ includes calls from alarm companies. Alarm companies work in close contact with the public safety entities specifically named by the Commission. For

³ *Declaratory Ruling* at ¶33.

⁴ *Id.*

⁵ *Declaratory Ruling* at ¶36.

example, alarm companies will attempt to contact the customer before requesting a police dispatch to prevent false alarms. In fact, many cities and even some states mandate that alarm companies attempt to contact the customer by telephone to ensure that an alarm event has occurred.⁶ If an alarm company's call to the customer is blocked, the police may be unnecessarily dispatched to the customer location.

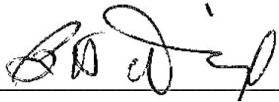
Alarm companies also place calls to public safety entities not only to request dispatch to a premise but also to provide important information to the public safety entities regarding the situation they will encounter at the premise, which helps to protect both the customer and the responding public safety personnel. In addition, alarm companies also provide their customers other, potentially life-saving information such as alerts of suspicious activity in a particular market (e.g., someone is knocking on doors soliciting customers pretending they are from the alarm company); or proactive security alerts (e.g., in an area that has been subject to recent home invasions). Therefore, the Commission should make clear that alarm companies' communications should be safeguarded from blocking.

Finally, the Commission should clarify that voice service providers must implement any call-blocking program in a non-discriminatory way with respect to non-affiliated alarm companies. Alarm companies are dependent on voice service providers for the underlying communication service used to provide critical alarm services. At the same time, many voice service providers also provide alarm services and AICC's members face intense competition from them and/or their alarm provider affiliates. Accordingly, the Commission should make clear that voice service providers must use the same level of care not to block unaffiliated alarm company calls that they take to ensure affiliated alarm company calls are not blocked.

⁶ See, e.g., Seattle, Washington Municipal Code § 10.08.165

Respectfully submitted,

**THE ALARM INDUSTRY
COMMUNICATIONS COMMITTEE**

By 
Benjamin H. Dickens, Jr.
Mary J. Sisak
Salvatore Taillefer, Jr.

Blooston, Mordkofsky, Dickens,
Duffy & Prendergast, LLP
2120 L Street, NW, Suite 300
Washington, DC 20037
Phone: (202) 659-0830
Facsimile: (202) 828-5568

Filed: July 8, 2019

Alarm Industry Communications Committee
Membership

* * *

The Monitoring Association (TMA)	Security Industry Association (SIA)
Electronic Security Association (ESA)	National Public Safety Telecommunications
ADT	Council (NPSTC)
AES-Intellinet	Nortek
AFA Protective Systems	OneTel
Alarm.com	Rapid Response Monitoring
Alarm Detection Systems	Ring, LLC
Axis Communications	Security Central NC
Bay Alarm	Select Security/Security Partners
Bosch Security Systems	Stanley Security
COPS Monitoring	Supreme Security Systems, Inc.
CRN Wireless, LLC	Telular Corp.
DGA Security	TRG Associates
Digital Monitoring Products	*Tyco Integrated Security
FM Approvals	*Tyco Security Products
Honeywell Security	Underwriters Laboratories
Inovonics	Universal Atlantic Systems
Intertek Testing	Vector Security, Inc.
iPDatatel	Vivint
Napco Security	Wayne Alarm
NetOne, Inc.	

*Tyco is now Johnson Controls