

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

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In the Matter of)

Advanced Methods to Target and Eliminate)
Unlawful Robocalls)

Call Authentication Trust Anchor)

CG Docket No. 17-59

WC Docket No. 17-97

Accepted / Filed

JUL 24 2019

Federal Communications Commission
Office of the Secretary

COMMENTS

The Alarm Industry Communications Committee ("AICC") hereby files comments in the FNPRM in the above-captioned dockets.¹ Specifically, AICC urges the Commission to ensure that calls to and from alarm central stations are never blocked by voice service providers. Any Critical Call List that is developed should include outgoing numbers used by alarm companies to notify emergency personnel and consumers of an alarm incident, and to confirm that emergency services are, in fact, required. Further, consumers and alarm companies must be able to easily remove themselves from any call blocking programs before they are implemented by voice service providers and they must be able to easily correct any errors made by the voice service provider when blocking calls.

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,

¹ *In re: Advanced Methods to Target and Eliminate Unlawful Robocalls*, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, FCC 19-51, CG Docket No. 17-59, WC Docket No. 17-97, rel. June 7, 2019 ("FNPRM").

² A list of AICC's membership is attached.

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pharmaceutical plants, chemical plants, banks, schools and universities. In addition to these commercial and governmental applications, alarm companies protect a large and ever-increasing 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.

Alarm companies and their customers are dependent on the networks and services provided by voice service providers. Alarm signals from a customer's premise oftentimes are transported to the alarm company central station via the customer's voice service provider's network and services. Following the receipt of an alarm signal, alarm companies will attempt to contact the customer to confirm the presence of an alarm event before requesting a police dispatch. In fact, in an effort to reduce false alarms, many cities and even some states mandate that alarm companies attempt to contact the customer by telephone to ensure that emergency services are needed, before first responders are dispatched.³

At this point, the alarm company will then place an outgoing call to a public safety entity, such as PSAPs, police, fire and emergency operations centers, as appropriate, to respond to the alarm. The alarm company also may provide additional contextual information describing the situation that the responding public safety personnel will encounter, including presence of pets, language spoken by building occupants, the number of individuals in the building, etc., which can better protect the consumer and the public safety personnel. All of these communications are critical to ensure the life and safety of the alarm customer and the public safety personnel, and all of these calls require unrestricted access to the voice networks that connect protected sites, alarm

³ See, e.g., Seattle, Washington Municipal Code § 10.08.165, Georgia State Code, O.C.G.A. § 35-1-9.

company central stations, and PSAPs. If any of these communications channels are blocked, public safety could suffer and false alarm incidents, which the industry has been working doggedly to reduce, will increase.

The Commission's desire to address fraudulent and scam calls is understandable; however, the proposals in the FNPRM, as well as the Commission's actions in the Declaratory Ruling, could trigger unintended consequences, including blocking or mislabeling of calls that are critical to the public safety and to the safety of particular individuals, unless alarm company calls are specifically protected from blocking. AICC is aware of at least one alarm company central station outbound number that has been labeled by a voice service provider as suspected fraud. Compounding the error, the alarm company has been unable to contact anyone at the voice service provider company, which offers a competing alarm service of its own, to rectify the situation, highlighting the need to establish a robust challenge mechanism to reverse incorrect blocking or mislabeling of critical calls. Further expanding the authority of voice service providers to block calls based on information provided under the SHAKEN/STIR framework may exacerbate the blocking or mislabeling of critical calls, especially if implemented and applied in a discriminatory or anti-competitive manner.

Because voice service providers cannot guarantee 100% accuracy when labeling and blocking calls, AICC maintains that the consumer must be clearly notified that blocking will occur, and permitted to determine their own level of risk with regard to the use of call blocking services. There should be no "safe harbor" for voice service providers that make this determination for the consumer and incorrectly block calls.

To ensure that “emergency calls” are not blocked, the Commission considers requiring any voice service provider that offers call-blocking to maintain a “Critical Call List” of numbers it may never block. The Commission states that such lists would include outbound numbers of 911 call centers and government emergency outbound numbers and asks whether alarm company numbers should be included in such a list. AICC strongly supports the inclusion of alarm company numbers in the proposed Critical Call List. At a minimum, outbound calls from alarm company central stations should be included in any Critical Call List(s) and should not be blocked.

In its Petition for Declaratory Ruling, AICC has asked the Commission to make clear that voice service providers apply equal treatment to unaffiliated alarm companies as the treatment provided to their own affiliated alarm companies and services.⁴ AICC renews that request in these comments. In addition to a Critical Call List, AICC asks the Commission to require voice service providers to identify and make available to unaffiliated alarm companies all of the protections and methods they make available to their own alarm services to avoid mistaken call blocking and to resolve a call-blocking issue when it is identified. Moreover, if an alarm company’s outgoing number is blocked, it should receive some type of notice when placing the outbound call so that corrective action can be taken immediately.

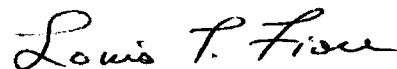
Finally, AICC shares the concern of consumer advocates that numbers on a Critical Call List could be targets of spoofing. AICC welcomes the opportunity to work collaboratively with

⁴ *Petition for Clarification or Reconsideration of the Alarm Industry Communications Committee*, CG Docket No. 17-59, WC Docket No. 17-97, filed July 8, 2019.

voice service providers, public safety representatives and members of the alarm industry to develop procedures and practices to protect the security of such lists.

Respectfully submitted,

**THE ALARM INDUSTRY
COMMUNICATIONS COMMITTEE**

A handwritten signature in cursive script that reads "Louis T. Fiore".

Louis T. Fiore
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Filed: July 24, 2019

**Alarm Industry Communications Committee
Membership**

* * *

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Electronic Security Association (ESA)

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AFA Protective Systems

Alarm.com

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