

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

<i>In the Matter of</i>)	
)	
Implementing Kari’s Law and Section 506 of RAY BAUM’S Act)	PS Docket No. 18-261
)	
Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems)	PS Docket No. 17-239

Comments of ADT LLC d/b/a ADT Security Services

Pursuant to the Federal Communications Commission (“Commission”) notice of proposed rulemaking in the above captioned matters, ADT LLC d/b/a ADT Security Services (“ADT”) respectfully submits these comments.¹ ADT supports the adoption of uniform, federal rules that create a baseline set of requirements for 911 calling capabilities of multiline telephone systems (“MLTS”). ADT urges the Federal Communications Commission (“Commission”) to retain flexibility in achieving these requirements in light of rapidly evolving technologies and enterprise communications solutions. ADT also affirms the Commission’s suggestion that security monitoring providers can cost-effectively serve as off-site entities to receive 911 call notifications and aid first responders in quickly and efficiently reaching callers.

Background

ADT is the nation’s largest alarm monitoring company serving approximately 7.2 million customers. Although ADT may be best known for providing residential home monitoring

¹ *Implementing Kari’s Law and Section 506 of RAY BAUM’S Act*, Notice of Proposed Rulemaking, PS Dockets 18-261 & 17-239, FCC 18-132 (rel. September 26, 2018) (“*Notice*”). The Commission has also received information on enterprise communications systems in response to its 2017 Notice of Inquiry. *Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, Notice of Inquiry, 32 FCC Rcd 7923 (2017) (“*ECS NOI*”).

services, ADT also provides ever more sophisticated security services to businesses, including businesses using MLTS. For example, ADT offers on-site video verification that enables ADT's agents to observe events in real time and relay that information to the PSAP or directly to first responders. ADT can thus provide precise information regarding the location of the event. Video clips of the alarm causing event are also simultaneously available to business owners or managers on their PCs or smart phones. ADT's business services also empower business managers to remotely view the status of the system or individual devices, engage in two-way communications, control access to the site or to specific areas of the site, as well as control lighting, HVAC, and other on-site systems.

ADT is also looking into innovative ways to couple its increasingly IP-enabled monitoring devices and systems with new communications technologies that could greatly enhance public safety as the 911 ecosystems evolves to next generation 911. For example, ADT is exploring methods that would convey video clips from its video verification feeds directly to PSAPs and first responders. It is also exploring embedding beacons in ADT's ubiquitously deployed on-site monitoring devices that could be used to provide highly granular location information. ADT is also investigating ways to utilize smart home speakers. The embedded microphones/speakers can, for example, be programmed to listen for an alarm and be enlisted to aid ADT's agents in engaging in communications with home or business owners to verify events and/or contact PSAPs or first responders, possibly through the ASAP to PSAP program (described below) where it has been adopted by PSAPs. ADT is also exploring ways to incorporate the FirstNet network into its communications between monitored sites, ADT's monitoring centers and first responders and PSAPS.

The ASAP to PSAP Program

ADT, along with a number of other alarm monitoring companies, has implemented the Automated Secure Alarm Protocol (ASAP) to Public Safety Answering Point (PSAP), or ASAP to PSAP, program.² The ASAP service is a set of standardized protocols jointly developed by the Association of Public-Safety Communications Officials (APCO) and The Monitoring Association (formerly known as the Central Station Alarm Association) and is currently being used by PSAPs in 13 states.³ Upon receiving an alarm signal, ASAP digitally conveys information from the alarm company to a PSAP's computer-aided dispatch (CAD) program, negating the need for a live telephone conversation between the 911 call taker and the alarm company agent. Traditionally, an alarm company agent would call the PSAP over a non-emergency line. Sometimes the PSAP may not be able to answer that call immediately, and even once the call is answered the alarm company agent and PSAP employee would take minutes to exchange information.

ASAP replaces this verbal communication with an automated process. ASAP to PSAP has been shown to reduce dispatch time from minutes to seconds and eliminate errors or miscommunications that can occur in human conversations. The service may, in the future, transmit to the PSAP critical information such as floor plans, the presence of hazardous materials or other pre-programmed information relating to the site, as well as automatically provide premises owner contact information, and exchange status messages. The PSAP may in turn automatically deliver this information to first responders as they respond to the event.⁴ The

² *Automated Secure Alarm Protocol Now Available to PSAPs Around the Country*, The Monitoring Association (Sept. 16, 2015), <https://tma.us/adt-is-live-with-asap/>, (heralding ADT's adoption of ASAP to PSAP as a milestone for the program.)

³ *ASAP-to-PSAP Now in 13 States and Surging*, Security Sales & Integration (Nov. 2, 2018), <https://www.securitysales.com/news/asap-psap-13-states-surging/>.

⁴ See eg. *ASAP to PSAP Protocol*, APCO International, <https://www.apcointl.org/resources/interoperability/asap-to-psap/asap-to-psap-protocol/> (last visited Dec. 4, 2018); *ASAP Saves Time, Improves Accuracy, and Increases*

program also increases PSAP efficiency by reducing the number of calls that PSAP agents must handle and also reduces PSAP costs. ASAP to PSAP is an important aspect of next generation 911 services.

As its commitment to ASAP to PSAP reflects, ADT has always been an integral partner in promoting public safety and looks forward to utilizing new technologies to further collaborate with the 911 ecosystem and first responders.

I. Designating Security Monitoring Providers to Receive 911 Call Notifications

Kari’s law requires “persons engaged in the business of installing, managing or operating” MLTS to “configure the system to provide a notification to a central location at the facility . . . or to another person or organization regardless of location” if the system can provide the notification “without an improvement to the hardware or software of the system.”⁵ The notification obligation would apply to MLTS manufactured, first sold or installed after February 16, 2020. As reflected in the *Notice*, most MLTS sold and installed today have this notification capability.⁶

In implementing this notification requirement, ADT urges the Commission to retain flexibility in the manner and destination of any required notification, which is primarily designed to assist first responders in responding to a 911 call. As the Commission notes, Congress did not intend to “limit the flexibility” of MLTS installers, managers and operators “to develop efficient and cost-effective notification solutions that are appropriate for the technology they use, such as visual alerts on monitors, audible alarms, text messages, and/or email.”⁷ In particular, ADT

Efficiency between PSAPs and Monitoring Centers, The Monitoring Association, <https://tma.us/asap/> (Last Updated Oct. 16, 2018); *New ASAP to PSAP Technology Speeds Up Alarm Call Processing by 2 - 3 Minutes*, Central Square Formerly Tritech (Nov. 14, 2017), <https://www.tritech.com/news/new-asap-to-psap-technology-speeds-up-alarm-call-processing-by-2-3-minutes>.

⁵ *Notice* at ¶14 (quoting 47 U.S.C. § 623(c)).

⁶ *Id.* at ¶¶48-49.

⁷ *Id.* at ¶26.

supports the Commissions suggestion that the notification obligation may be met in whole or in part by configuring MLTS to send notifications to offsite third parties that provide “security or safety services” to the enterprise.⁸ As the Commission indicates, companies already connected to and monitoring the enterprise location, such as “alarm companies,” could cost effectively provide “efficiencies by providing 911 notification monitoring for multiple customers.”⁹ The notification would constitute a natural extension of the verification services that the alarm companies already provide.

Sending notifications to companies such as ADT that have visibility into and access to the premises offer a number of advantages. For example, where authorized by the premises owner, ADT’s agents can enable access to the premises by remotely unlocking doors. Agents with video feeds from the enterprise could also help direct first responders to the location of the caller or 911 event. Moreover, where the PSAP has adopted the ASAP to PSAP program, ADT may, in the future, be able to transmit vital information regarding the site to the PSAP and to first responders, such as floor plans or the presence of hazards. Conversely, ADT can also inform PSAPs or first responders that the 911 call was made in error – a role ADT plays today through its video verification and other services.

Moreover, sending notifications to alarm or security companies would be particular advantageous for the smaller or midsize companies that ADT serves. As the Commission notes, these companies do not typically have on-site security desks or designated security personnel.¹⁰ These companies could cost-effectively utilize alarm or security companies to receive an off-site notification. Moreover, security companies could provide this service for all businesses that use its services, potentially creating scale efficiencies by bundling these enhanced services with their

⁸ Notice at ¶24.

⁹ *Id.* at ¶26

¹⁰ *Id.* at ¶27.

existing security services, or perhaps by consolidating the services provided to businesses with multiple locations. Where the event causing the need for a 911 call has also triggered an alarm, the alarm signal could act as the necessary notification without need for an additional, separate communication.

For these reasons, ADT respectfully urges the Commission to adopt a notification scheme that provides flexibility in utilizing off-site resources.

II. ADT Is Exploring Ways to Leverage Its Monitoring Devices to Provide Dispatchable Location Information

The Commission proposes that the notification contain three pieces of information: (1) the fact that a 911 call has been made; (2) a call back number by which the caller can be directly reached; and, (3) some form of dispatchable location information.¹¹ ADT generally supports these requirements, but again urges the Commission to provide flexibility for industry to devise various solutions to develop and convey this information.

The record developed in response to the Commission's *ESC NOI* reflects that enterprise communications systems, or MLTS, have the technical capability of conveying highly granular location information.¹² Despite this capability, state and local public safety authorities identified numerous cases where the 911 was either misrouted or failed to provide location information beyond a general street address, indicating more work is needed to ensure adoption and use of

¹¹ The Commission proposes to adopt the RAY BAUM Act's definition of dispatchable location as "A location delivered to the PSAP that consists of the street address of the calling party, plus additional information such as suite, apartment or similar information necessary to adequately identify the location of the calling party." *Notice* at n. 96.

¹² *Comments of West Safety Services, Inc.*, PS Docket No. 17-239, at 12-13 (filed November 15, 2017) (Describing solution that "automatically tracks and assigns locations to IP hard phones, soft phones and wireless phones" as well as onsite 9-1-1 call notification, real-time location updates and call delivery to VoIP Positioning Centers using SIP or local trunking) ("*West Safety Services ECS NOI Comments*"); *Comments of RedSky Technologies, Inc.*, PS Docket 17-239, at 4 (filed November 15, 2017) ("ECS has the capability to provide location to the exact office, cubicle or apartment.") ("*RedSky ECS NOI Comments*"); Letter from Greg Rogers, Deputy General Counsel for Bandwidth Inc., to Ms. Marlene Dortch, Secretary, FCC, PS Docket No. 17-239 at slide 10 (filed May 4, 2018) (describing dynamic location solution that utilizes Wi-Fi access points as a location reference) ("*Bandwidth Ex Parte*"). *But see, Comments of RingCentral, Inc.*, PS Docket No. 17-239, at 6-7 (filed November 15, 2017) ("any move to autolocation for nomadic uses of interconnected VoIP 911 would be premature").

technically capable systems.¹³ ADT has been assessing possible uses of its monitoring devices to assist in providing granular dispatchable location information. As noted in the background section above, ADT is considering the possibility of embedding beacons in its monitoring devices that are deployed throughout the business premises. These beacons can act as reference points to locate a 911 caller. Using beacons to help locate a caller is similar to the NEAD being developed for wireless 911 location accuracy and is feasible to use in MLTS environments.¹⁴

Conclusion

ADT supports the Commission's proposal to bring enhanced 911 capabilities to enterprises. ADT is ideally situated to assist in this important endeavor and looks forward to working with MLTS provider and operators and the public safety community.

¹³ See, e.g., *West Safety Services ECS NOI Comments* at 26-28 (listing examples compiled by CalNENA);

¹⁴ See, e.g., *Bandwidth Ex Parte* at slide 10; *Redsky ECS NOI Comments* at 7; *West Safety Services Comments* at 23 (describing NEAD as a national database containing physical dispatchable locations using Wi-Fi Access Points and Bluetooth low energy beacons and stating that MLTS could support a similar location system to locate mobile Wi-Fi devices connected to the enterprise's network).

Respectfully submitted,

/s/ Michael Pryor

Michael H. Pryor

Brownstein, Hyatt, Farber, Schreck, LLP

1155 F Street NW, Suite 1200

Washington, DC 20004

Telephone: (202) 383-4706

MPryor@BHFS.com

*Counsel for ADT LLC d/b/a ADT Security
Services*

Holly Borgmann

Head of Government Affairs

ADT LLC d/b/a ADT Security

Services

1501 Yamato Road

Boca Raton, FL 33431

Telephone: (562) 226-3484

HBorgmann@adt.com

December 10, 2018