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March 14, 1996

Office of the Secretary
FCC
1919 M Street NW
Washington DC 20554

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Re: CS Docket No. 95-184 - Telecommunications Services Inside Wiring

The following are our comments pertaining to the FCC's proposed rulemaking on inside wiring issues. As a provider of various demarcation devices to both the telephone companies and cable operators, we believe that we understand many of the subtle demarcation differences associated with these two groups and the issues affected by convergence.

To address, in a sentence, one of your main concerns, it is technically feasible to provide a common demarcation point for any and all services (data, voice, video) and any and all signal transport means (twisted pair, coax, fiber, wireless).

Additional concerns are addressed below:

(1) Give service providers equal access to subscribers inside wire.

This will create a uniform equal access point for all providers to terminate their networks which will:

- Improve grounding means by establishing a common earth ground. Thus eliminating any ground fault potentials between the various network designs.
- Simplify new building construction so that all network wires enter the same point on the home so there is no more confusion as to where the inside wire will exit the home. Existing homes requiring additional/new wiring for either video or voice services should also follow these guidelines.
- Promote cooperation between providers so that an alternative service provider will not be required to perform significant wiring modifications from the network drop point or side of the home location in order to connect to the existing inside wiring.

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Additionally, where possible, the equal access point should be on the outside wall of the home for any and all types of services to allow for quicker and less expensive network connection. The existing rules for telephone service demarcation require all new homes to be outfitted with a means to disconnect the inside wiring from the network typically called a Network Interface Device (NID). When the telephone company visits a home for any reason, they are required to install a NID if one does not exist. This policy should remain in place and enforced because it clarifies the FCC's demarcation policy and further promotes the ability to equally access to the subscribers inside wiring. A similar policy for cable operators will bring the same benefits.

(2) Make it easy for the subscriber to change service providers.

In order to foster competition, the subscriber should have the ability to quickly and inexpensively change local telco, video and data, service providers much the same as we now can change long distance service companies. To reach this service level, the local telco, video and data service provider must have quick access to the point where the inside wiring enters the home and there must be a common hand-off.

A common hand-off is necessary to ensure that the wires entering a subscriber's home are left intact each time the subscriber changes providers and the incumbent disconnects while the new provider reconnects to the inside wire. If the twisted pair and coax cables are hardwired to the network, it will be very difficult and expensive to change providers.

Currently, the common network hand-offs that meet the safety standards of the National Electric Code are the RJ-11 Jack for twisted pair cable and the "F" Connector for coaxial cable. Each of these has become at least the defacto standard in the telco and cable markets, respectively.

(3) Simplify/clarify network owned property versus subscriber owned property for demarcation and testing purposes.

It is the subscribers right to control the access to his/her home and inside wiring. With convergence and open competition, the potential for confusion on the part of the subscriber exists. While long distance competition offered subscribers choice and some transition confusion, there was no need for the service provider to visit the home to rewire, upgrade or disconnect the existing system. It will become a necessity for facilities based local telco, video and data service providers to modify/add equipment to the side of the residence and quite

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possibly access the inside wiring in order to offer new services. As different providers utilize varying technologies to provide these services, there needs to be a clear and simple demarcation point. We cannot expect the subscriber to be sophisticated in electrical wiring or expect him to pay an electrician to identify where simple network vs. subscriber problems lie. By requiring the cable operators to follow a clear demarcation policy, similar to that which the telco's follow, the subscriber can be protected.

These suggestions for a common demarcation point are applicable to both single residences and multi-dwelling units while we admit the issues surrounding the multi-dwelling units are more complicated.

The objectives of the FCC to increase competition, simplify subscriber choice and understanding, improve service options all the while maintaining strict safety standards, can be met via a common demarcation point for all wired communication services.

By requiring the service providers to terminate their simple wiring twisted pair cable network with an RJ-11 jack and their coaxial cable network with an "F" Connector ground block, both accessible to the subscriber in a common location and meeting electrical and RF spectrum safety requirements, the FCC will meet its stated objectives.

In summary, a uniform set of inside wiring/demarcation rules is necessary in order to: (1) give the service providers equal access to the subscribers inside wiring, (2) make it easy for the subscriber to change service providers and (3) simplify/clarify network owned property versus subscriber owned property for demarcation and testing purposes.

Thank you for allowing us to provide you with our comments and we would be glad to further discuss our views with you.

Best regards,
KEPTEL



David S. Stehlin
President