



*Boston
Washington*

*Rachel Sanford
Director of Government Relations
ML Strategies, LLC
701 Pennsylvania Ave NW
Suite 900
Washington, DC USA
202-434-7485
202-434-7400 fax
www.mlstrategies.com*

December 8, 2014

Via Electronic Filing

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte In the matter of *Ensuring Customer Premises Equipment Backup Power for Continuity of Communications* (PS Docket No. 14-174); *Technology Transitions* (GN Docket No. 13-5); *Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers* (RM 11358); *Special Access for Price Cap Local Exchange Carriers* (WC Docket No. 05-25); *AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services* (RM-10593)

Dear Ms. Dortch:

On Tuesday, December 4, 2014, Paul Plofchan, ADT Vice President for Government and Regulatory Affairs along with Rachel Sanford of ML Strategies, met with Matt DelNero, Daniel Kahn, Michelle Berlove, and Heather Hendrickson of the Wireline Competition Bureau.

ADT is the largest alarm and home monitoring service provider, helping to protect over 6.7 million homes and businesses in North America from fire, burglaries, sabotage and other emergencies. The IP Transition has the potential to affect life safety services and connections to first responders operated by ADT and the thousands of smaller companies that make up the electronic security industry.

ADT thanks the Commission for approving items related to technology transitions and public safety in the above referenced proceedings at the Open Commission Meeting on November 21. The Notice of Proposed Rulemaking (NPRM) asks a number of interesting questions about preserving public safety and consumer interest in the IP Transition. ADT is pleased to see these ideas reflected in the NPRM and looks forward to a robust discussion of these issues in the docket.

ADT has two primary concerns related to the IP Transition. ***First and foremost, existing alarm systems must be tested during the Technology Transitions trials to ensure they will communicate with monitoring centers following the transition, without the need for customer and/or security company intervention.*** Data collected during the transition trials on key questions (i.e. how many customers used alarm systems, what percentage of these customers had

the systems' functionality tested, and verification of the line seizure function in these alarm systems) will help ensure ADT's stated aim is met.

ADT believes the Managed Facilities Voice Network (MFVN) standard has provided telecommunications service providers and the alarm industry with the appropriate standard to ensure alarm functionality with existing and emerging technology introductions, including broadband. As noted in the NPRM, ADT continues to work with relevant stakeholders, including broadband network providers, to ensure MFVN standards are met.¹ This effort is vitally important to public service life safety protection goals as it helps ensure alarm monitoring systems already in place continue to protect consumers' homes and businesses.

Second, it is an ADT priority to ensure that the IP Transition does not create an unlevel playing field within the electronic security marketplace. The alarm industry has a competitively healthy marketplace, including some telecommunications and broadband service providers who offer electronic security products in addition to their traditional offerings. When customers are forced to switch from copper-based to IP-based communications services, a severe distortion in the electronic security marketplace could result, especially if the consumer has not had an opportunity to properly evaluate the competitive product offerings available from market participants, including their existing alarm service provider.

ADT believes it is important for the public and private sector to come together to define rules of the road that preserve competition and protect consumers in the electronic security marketplace. As a starting point, one possible approach might be to prohibit "up sell" offers from the technician during the technology transition service call. In addition, appropriate customer communications are necessary to ensure customers understand that their existing customer premise alarm equipment is compatible with the new communication service.

In summary ADT's concerns are as follows:

1. Following the transition, all customers' alarms systems must continue to operate as before without any interruption in communications to the professional alarm monitoring centers.
2. Transition policy "rules of the road" should prevent market distortions during the new technology installation period.

¹ *Ensuring Customer Premises Equipment Backup Power for Continuity of Communications; Technology Transitions; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers; Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Notice of Proposed Rulemaking and Declaratory Ruling, PS Docket No. 14-174, GN Docket No. 13-5, RM-11358, WC Docket No. 05-25, RM-10593, FCC 14-185, ¶ 101 (rel. Nov. 25, 2014).

As a dedicated participant in the public safety process, ADT greatly appreciates the Commission's actions on technology transitions. We look forward to continuing this important discussion.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS, and a copy will be provided via email to the attendees.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Sanford", with a stylized flourish extending to the right.

Rachel Sanford
Director of Government Relations
ML Strategies

Cc: Matt DelNero, Daniel Kahn, Michelle Berlove, Heather Hendrickson