

**Before the
FEDERAL COMMUNICATIONS COMMISSION**
Washington, DC 20554

February 3, 2015

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

**COMMENTS OF THE
ELECTRONIC SECURITY ASSOCIATION**

The Electronic Security Association (“ESA”), on behalf of its members hereby files comments on the Commission's Notice of Proposed Rulemaking (NPRM) addressing a number of issues in connection with copper retirement and the transition of networks to

Internet Protocol (IP), including backup power, the network change notification.

ESA is the largest trade association in the United States representing large and small businesses that professionally install and monitor electronic life safety and security systems for the public. ESA member companies represent more than 70 percent of the market for intrusion, fire alarm, access control and video surveillance systems, which are a vital component of public safety. They employ more than 400,000 security industry professionals, and service over 30 million residential and commercial clients. In

partnership with an alliance of state associations, more than 2,500 electronic life safety and security businesses hold membership in ESA.

We understand that the Alarm Industry Communications Committee (AICC) will be filing comments to the commission on this proposed rulemaking. ESA is an active member of the AICC and fully supports the positions of this major industry committee and their view of the alarm communications issues appearing in this FCC docket.

Of critical importance in the proposed rulemaking to ESA members and the alarm monitoring industry is; 1) having the ability to provide reliable back up power and communications during power outages for residential and commercial consumers; 2) insuring consumers have a choice when considering communication providers and; 3) insuring new communication technologies have equivalent or greater reliability and dependability as the technology it is replacing. Therefore, we seek the Commission's support that will ensure access to reliable communications is preserved, not degraded.

Reliable back up power

We urge the Commission to promote adherence in their rulemaking to the National Fire Protection Association (NFPA) minimum standards on the battery backup requirement of eight hours. The ability to maintain power for life saving communications during power outages is critical to protecting consumer's welfare. Not only is standby power for communications important for life safety systems, but it is also critical in allowing the consumer to dial 911 during these outages.

In regards to providers educating customers on the potential loss of service that might occur during power outages, we strongly believe that this must be required.

The Commission asks whether broadband providers should have any responsibility to install and/or monitor battery status and determine whether the battery has degraded. To improve its effectiveness and ease of use for the consumer, the backup power system should include a self- monitoring feature that notifies the customer audibly and visually when the backup power system is in use and when it is running low. A backup power system that provides an audible alarm sound only would not be effective if the consumer is not at home or otherwise does not hear the alert, which is entirely possible if the battery

backup unit is outside or in the garage. We believe that many consumers will not pay attention to these warnings and some may not be able to know what to do next. This is especially true of our older American population. During a US Senate Congressional hearing many Senators voiced concerns on whether the elderly are able to understand battery backup requirements. In many cases it requires personal interaction with consumers to assist with upgrading or changing a battery that needs attention. ESA believes more information and discussion is necessary to fully consider this question.

Consumers should have a choice when considering communication providers

Another concern regards the issue of competition. In many cases rural customers may only have one ISP provider available. ISP providers are now entering the electronic life safety and security industry. These providers could have economic reasons to engage in paid prioritization, or prioritize the subsidiary services of the ISP to the detriment of consumers. This presents an unwarranted risk to citizens and independent businesses throughout the country.

ESA members are not against new technology or competition, nor are we opposed to innovative communications.

Equivalent or greater level of reliability and dependability

It is paramount that new technologies perform to the same level as existing communications and be proven in real world field conditions. Currently the industry is experiencing many occasions in the field where legacy alarms will not communicate using VoIP technologies.

In this regard we are very concerned that the technologies described in this comment document should adhere to a simple and direct standard; the proposed technology should be more reliable than the present, especially with regard to VoIP technology versus time tested and reliable copper.

Based on ESA member and customer experiences, the reliability of VoIP technology, with limited back up power supply capabilities, remains questionable at best as an immediate and viable solution for copper-based technology. We cannot afford to experiment when lives are at stake. The Commission should not consider copper retirement for ISP

providers moving forward with new VoIP technology, unless it is independently determined that VoIP technology performs the same as or better than copper.

Therefore, we urge the Commission to require more extensive testing and validation by manufacturers and ISP's for any technology that seeks to impact the communications method used by electronic life safety and security industry.

Conclusion

We applaud the discussion in paragraph 37 of this proposed rule in which the Commission asks whether it should "promote or monitor" continuity of service standardization. We agree with your inquiry and feel that providers and manufacturers need further and extensive testing of systems and devices for continuity of service. We would encourage expanded testing of new technology to ensure that alarms are not degraded in providing service to customers. We agree with comments such as those in paragraph 17, which states that, "...before policymakers can state with confidence that any new technology is comparable to or better than existing network technology, they must know the metrics by which to compare the two."

ESA is supportive of finding ways to protect consumers in preserving their lives and property in these dangerous times. No matter what the disaster or event is that impacts a community, our members are dedicated to provide continuity of communication services, protect our infrastructure and assist residential and commercial customers to get back to business and their daily lives. We look forward to working with the Commission as you proceed to suggest rules for the public to consider.

Respectfully submitted,



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