

April 15, 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:

This letter follows up on the March 18, 2015 meeting at the Commission's office between representatives of ADT Security Services ("ADT") and members of the Wireline Competition Bureau and Public Safety and Homeland Security Bureau.^{1/} As a result of that discussion, ADT provides a proposed rule governing the adoption of Managed Facilities Voice Network ("MFVN") standards to ensure that customers with critical life safety and security systems do not lose capabilities during the IP Transition.

The MFVN standards that ADT have entered into have been carefully negotiated between sophisticated parties in order to ensure that proper technical specifications are in place in order for life safety systems to operate effectively. For example, filings in this docket by both ADT^{2/} and AT&T^{3/} reflect the type of principles usually included in MFVN agreements between alarm services providers and telecommunications service providers.

^{1/} The details of this meeting are set forth in my *ex parte* letter submitted to the Commission on March 20, 2015.

^{2/} Comments of ADT Security Services, GN Docket No. 13-5, *et. al.* (filed February 5, 2015).

^{3/} Reply Comments of AT&T Services, Inc., GN Docket No. 13-5, *et. al.* (filed March 9, 2015) (*AT&T Reply Comments*).

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

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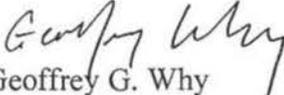
ADT believes that the Commission should consider adoption of the proposed rule set forth in Exhibit A to this letter, which is adapted from the MFVN standards agreed to by AT&T and ADT,⁴⁷ for the benefit of all relevant providers as the progress through the IP Transition.

As ADT has stated previously, the Commission's recognition of MFVN principles in rules extends the benefit to millions of alarm customers served by the more than ten thousand small businesses in the alarm industry And helps ensure the process does not have to be repeated for future technology transitions. As such, any rule recognizing MFVN principles should remain technology neutral.

ADT appreciates the Commission's consideration of these issues, and stands ready to address any further questions or concerns the Commission or Commission Staff may have regarding the MFVN principles.

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,


Geoffrey G. Why

Enclosure

Cc: Matthew DelNero, Deputy Chief, Wireline Competition Bureau
Daniel Kahn, Wireline Competition Bureau
Heather Hendrickson, Wireline Competition Bureau
Linda Pintro, Public Safety and Homeland Security Bureau
Jerome Stanshine, Public Safety and Homeland Security Bureau
Chuck Needy, Public Safety and Homeland Security Bureau
John Healy, Public Safety and Homeland Security Bureau

⁴⁷ See Comments of AT&T Services, Inc., GN Docket No. 13-5, *et. al.*, at 47, n. 122 (filed March 9, 2015); *AT&T Reply Comments*, Exhibit A (attaching the IP Transition and Alarm Monitoring Services Principles agreed to by AT&T and ADT).

EXHIBIT A

§ 1. Definitions

(a) *Managed Facility Voice Network* or *MFVN*. A physical facilities network that (a) is managed and maintained (directly or indirectly) by the service provider to ensure service quality and reliability from the service subscriber location to the Public Switched Telephone Network (“PSTN”) or other MFVN peer network; (b) utilizes the PSTN, or similar signaling and related protocols as the PSTN with respect to dialing, dial plan, call completion, and the carriage of alarm signals and protocols, loop voltage treatment (in accordance with FCC Part 68/TIA-968A); and (c) provides realtime transmission of voice signals, carrying alarm formats unchanged.

(b) *Telecommunications Carrier*. Any person defined as a “Telecommunications Carrier” pursuant to 47 U.S.C. § 153(51).

(c) *TDM Service*. A time-division multiplexed, circuit-switched voice service offered by a Provider.

(d) *IP Service*. A voice-enabled service offered by a Provider that utilizes Internet Protocol, or any successor format, including Voice over Internet Protocol service.

§ 2. Managed Facility Voice Network Standards

(a) In the event a Telecommunications Carrier offers an IP Service in addition to, or as a replacement for, a TDM Service:

- (1) Each Telecommunications Carrier shall ensure that the IP Service shall continue to support the equipment and service offerings offered on MFVNs that the TDM Service is or was capable of supporting; and
- (2) Each MFVN provider shall supply professional installation of its services in a manner that preserves the primary line seizure function for alarm system transmission, or in the alternative, if the MFVN provider offers a self-installation option, it shall notify customers who choose this option of wiring practices necessary to ensure preservation of primary line seizure for alarm system transmissions.

(b) Each MFVN provider shall establish a major and minor disaster recovery plan, to address outages and widespread events. Such plans shall include consumer battery backup options in the event of a power outage.