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July 22, 2015

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

Re: Notice of Written 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:

The Central Station Alarm Association (CSAA) is an internationally-recognized, non-profit trade association that represents professional monitoring and alarm companies. Since its incorporation in 1950, CSAA has been a leader in industry standards and education. As part of this ongoing mission, CSAA recognizes the importance of industry standards and rules that protect consumers.

To that end, CSAA understands that the Commission will consider, during its upcoming open meeting in August, a “separate postage” rule in the Technology Transitions proceeding. This rule would address the issue of upselling, which was raised by the FCC in the Technology Transitions NPRM and referenced in industry filings in the docket.^{1/} CSAA strongly supports a separate postage rule, which would ensure that incumbent local exchange carriers (ILECs) separate materials that inform consumers about technology transitions from marketing materials related to services offered over IP-enabled networks.

A separate postage rule would require ILECs to separate informational materials about the IP Transition from any of the carriers own marketing materials. Because of the ILECs’ obligation to inform consumers about the technical transition, that message should not be coupled with upselling or marketing of additional services. In addition to achieving the worthy

^{1/} Ex Parte Letter filed by ADT Security Services, GN Docket No. 13-5, *et. al.*, (filed May 28, 2015).

goal of preventing consumer confusion, the separate postage rule would also ensure a level playing field in the free market for alarm and monitoring services.

Further, a separate postage rule would minimize consumer confusion without substantially interfering with carriers' ability to compete for business. For example, a customer might interpret a solicitation for a carrier's own security services, sent along with a notice related to the IP transition, as an indicator that the customer's existing security service will no longer work, or that a change in service is necessary to take advantage of the new technology, or even that a change in services is endorsed by the federal government or the FCC specifically. This confusion can be avoided by simply separating the solicitation from the informational communication.

In conclusion, CSAA strongly supports a separate postage rule and urges the FCC to include this provision in the forthcoming Technology Transitions Order.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay Hahn". The signature is fluid and cursive, with the first name "Jay" being more prominent than the last name "Hahn".

Jay Hahn
Executive Director
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