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April 15, 2016

Via Electronic Filing

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:

On Wednesday, April 13, Paul Plofchan, VP of Government and Regulatory Affairs for ADT, along with Alex Hecht and Rachel Nemeth of ML Strategies, met with the following Wireline Competition Bureau staff: Peter Saharko, Assistant Division Chief, Competition Policy Division, Megan Capasso, John Castle, Heather Hendrickson, and Michele Berlove. The purpose of this meeting was to discuss ADT's 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.<sup>1</sup> The proposed rule is included in Exhibit A of this filing.

Mr. Plofchan reiterated ADT's position that the Commission should consider adoption of the proposed MFVN rule, which is adapted from the MFVN standards agreements ADT developed with broadband providers. These agreements were 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.

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<sup>1</sup> See *ex parte* filing of ADT, GN Docket No. 13-5, *et. al.* (filed April 15, 2015), Exhibit A.

MFVN standards are not meant to be restrictive. Rather, MFVN standards ensure that key applications and fundamental life safety services work properly. Incorporating these standards into technology transitions policy would help create a universal, workable solution for future technology transitions. As noted above, large companies such as ADT have the capabilities and market power to negotiate these agreements individually, but a more standardized rule enshrined in technology transitions policy would be beneficial to all stakeholders including consumers. By including these standards in transition policy, the Commission would help ensure that essential services are maintained and tested, and that market competition is minimally disrupted.

ADT appreciates the Commission's consideration of these issues, and looks forward to continued engagement with the FCC on technology transitions.

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 'Alex Hecht', with a long horizontal flourish extending to the right.

Alex Hecht  
Vice President of Government Relations  
ML Strategies

Cc: Peter Saharko, Assistant Division Chief, Competition Policy Division, WCB  
Megan Capasso, Wireline Competition Bureau  
John Castle, Wireline Competition Bureau  
Heather Hendrickson, Wireline Competition Bureau  
Michele Berlove, Wireline Competition Bureau

## 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.