Alarm Industry Communications Committee

VIA ELECTRONIC DELIVERY

March 5, 2010

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

RE: Reply Comments
In the Matter of Preserving the Open Internet, GN Docket No. 09-191
Broadband Industry Practices, WC Docket No. 07-52

Dear Ms. Dortch:

The Alarm Industry Communications Committee ("AICC"), on behalf of its members, hereby responds to various comments submitted in the above-referenced dockets, concerning the Commission's proposed net neutrality rules. Effective, reliable communications networks and services are a vital component of the services provided by the alarm industry. Accordingly, AICC urges the Commission to adopt rules to ensure that alarm data is not blocked or hindered by any broadband Internet access service provider or Internet Service Provider (ISP). Further, AICC supports a requirement that broadband Internet access service providers and ISPs should disclose information concerning their practices that would impact an end user's alarm service.

The AICC is comprised of representatives from all segments of the alarm industry, including central station alarm companies, alarm monitoring centers, alarm installation companies, alarm manufacturing companies and the associations representing the majority of such companies operating in the United States. Alarm companies protect a wide range of sensitive facilities, businesses and residences and the occupants of each from fire, burglary, sabotage, and other emergencies. For example, they protect government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, and schools and universities. In addition, alarm companies protect approximately 20 million residences from burglary, duress, carbon monoxide and fire. They also provide medical alert services (e.g., obtaining ambulances) during medical emergencies. Approximately one-third of Americans today live in, work in and go to premises where security systems are utilized. Accordingly, many Americans would be

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impacted if broadband Internet access service providers or ISPs are able to impede or hinder the security applications upon which they rely to protect them from harm.

To ensure the continued effectiveness of the alarm systems protecting millions of Americans, alarm data must be transmitted accurately and promptly from the end user premise to the central station along the entire communications path. Neither broadband Internet access service providers nor ISPs should be allowed to interfere with the prompt and accurate transmission of this data. Moreover, broadband Internet access service providers and ISPs should not be allowed to discriminate in favor of their own offerings over those of an unaffiliated provider.

AICC also supports a requirement that broadband Internet access service providers and ISPs disclose information concerning their practices that would interfere with the proper functioning of the end user customer's alarm system. Users of security and fire alarm systems installed over the last 30 years have depended on the public switched telephone network (PSTN) to deliver with certainty, alarm signals to a centralized location where professional staff monitor the alarm signals and dispatch appropriate first responders as needed. This reliance on the PSTN for life safety applications is a direct result of the PSTN being engineered to assure a high probability of call completion. Broadband Internet access service providers and ISPs that provide services to replace the PSTN should have the same Quality of Service that the PSTN offers. This assurance needs to take into account the service windows and associated downtimes that are part of the migration to network-based telephony systems. AICC notes that like the PSTN, alarm central monitoring stations have sufficient redundancy to remain operational when equipment and software are upgraded and believes that no less should be provided by broadband Internet access service providers and ISPs.

Another significant challenge that has arisen as consumers migrate to VoIP-based communications services concerns a feature used by alarm systems known as line seizure. Line seizure allows an alarm panel to seize control of a phone line if alarm signals need to be transmitted to a monitoring center. Some providers of VoIP-based telephony do not take line seizure into account and bypass the line seizure device, rendering it inoperable. Consumer conversions to VoIP-based digital telephony systems can cause problems if the correct practices are not followed. For this reason, AICC supports a requirement that the customer should be notified by the VoIP provider when he or she switches to VoIP service to notify the alarm company and to test the system.

The AICC sees great potential for the use of broadband and IP-based communications in connection with alarm services. For example, whereas the PSTN allows for simplistic forms of data transmission, broadband provides the ability to transmit more data at faster speeds from protected premises and to forward this data to an alarm monitoring central station. Broadband also provides the ability for services such as video from the premises and other techniques that will reduce false dispatches and help response times. In addition, broadband service will aid medical alarm systems (called PERS or Personal Emergency Response Systems) by making the transfer of medical vital signs and other medical data more feasible.

However, an alarm system will not be effective if alarm data is blocked or hindered by the broadband Internet access service provider or the ISP. Further, broadband Internet access service providers and ISPs should be required to disclose any practices that would interfere with or affect the reliability of the transmission of alarm data.

Respectfully submitted,

/s/ Louis T. Fiore
Louis T. Fiore
Chairman
Alarm Industry Communications
Committee

CC:
Competition Policy Division, Wireline Competition Bureau