



Alarm Industry Communications Committee

October 12, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: Preserving the Open Internet; Broadband Industry Practices
GN Docket No. 09-191, WC Docket No. 07-52

Dear Ms. Dortch:

The Alarm Industry Communications Committee ("AICC")¹, on behalf of its members, hereby comments on the Commission's Public Notice released on September 1, 2010, in the above-referenced docket, seeking further inquiry on the relationship between open Internet protections and "specialized services," services that are provided over the same last-mile facilities as broadband Internet access service; and the application of open Internet rules to mobile wireless Internet access services. Although the Commission states that specialized services may drive additional investment in networks and provide valuable services to consumers, the Commission states that these services may impact the openness of the Internet. With respect to mobile wireless Internet access services, the Commission seeks comment on the extent to which mobile wireless providers should be permitted to prevent or restrict the distribution or use of applications that may intensively use network capacity. Effective, reliable communications networks and services are a necessary component of the services provided by the alarm industry. Increasingly, alarm companies and their customers are using wireline and wireless broadband networks and IP-based communications in connection with alarm services. Accordingly, fair and unhindered access to both wireline and wireless broadband networks is of vital importance to AICC's members.

¹ The AICC's members are comprised of the Central Station Alarm Association ("CSAA"), the Electronic Security Association ("ESA") (formerly the National Burglar & Fire Alarm Association), Bosch Security Systems, Digital Monitoring Products, Digital Security Control, Telular, Honeywell Security, Vector Security, Inc., ADT Security Services, Inc., APX, Bay Alarm, AES-IntelliNet, UTC Fire and Security, Alarm.com, Intertek Testing, Linear Corp., LogicMark, RSI-Videofied, United Central Control(UCC), Security Network of America, and Underwriters' Laboratories. CSAA and ESA are comprised of central station alarm companies, alarm monitoring centers, alarm installation companies and alarm manufacturing companies. Their memberships represent 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.

Access to communications networks, including wireline and wireless broadband networks, is critical to the alarm industry and the consumers it serves. To ensure the continued effectiveness of the alarm systems protecting millions of Americans, alarm data must be transmitted accurately and promptly along the entire communications path from the end user premise to the alarm monitoring central station and from the central station to the emergency response provider. Neither wireline nor wireless broadband network providers should be allowed to interfere with the prompt and accurate transmission of this data. In this regard, AICC agrees with the concern that broadband providers may have the ability and incentive to engage in anti-competitive conduct with respect to specialized services. Accordingly, AICC supports a requirement that any commercial arrangements between a broadband provider with a vertically-integrated affiliate or third party for the offering of specialized services must be offered on the same terms to other third parties.

Alarm companies and their customers also rely on wireless communications networks for the accurate and timely transmission of alarm signals and data. Accordingly, AICC supports the extension of anti-discrimination rules to mobile wireless providers. In this regard, AICC believes that pricing plans that charge different prices based on the amount of data a customer uses are an acceptable way to address network capacity concerns.

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, the ability of the alarm industry and its customers to rely on broadband and IP-based communications will be hindered if all aspects of the communications path are not reliable.

Respectfully submitted,

/s/ Louis T. Fiore

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Chairman

Alarm Industry Communications

Committee