

March 14, 2011

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

Re: Framework for Next Generation 911 Deployment  
PS Docket No. 10-255

#### **REPLY COMMENTS**

Dear Ms. Dortch,

The Security Industry Alarm Coalition (SIAC) wishes to submit these comments concerning the Federal Communications Commission's proposal to establish a framework for the deployment of "Next Generation 911" capabilities. As discussed below, SIAC agrees that the nation's 911 system should be brought into the 21<sup>st</sup> Century, but only in a way that does not create a large volume of false alarms for the public safety community.

SIAC is an industry group composed of representatives of all four of the national alarm associations. In particular, SIAC's Board of Directors is made up of two members from each of the major North American trade associations: Central Station Alarm Association (CSAA), Electronic Security Association (ESA), Security Industry Alarm Association (SIA), and Canadian Security Association (CANASA). SIAC's primary purpose is to work with public safety/law enforcement to reduce unnecessary alarm dispatches. To this end, SIAC is an active participant in the development of all alarm dispatch reduction standards. On behalf of its member alarm associations, SIAC is committed to:

- Assist with the development of false alarm reduction standards and procedures, and otherwise make every reasonable effort to reduce false alarms that result in false dispatches by law enforcement.
- Be diligent in educating alarm service providers, law enforcement, consumers and other interested parties in the tools and methodologies for reducing false alarms.
- Provide false alarm reduction assistance to law enforcement at no charge.

SIAC agrees with the comments of the public safety community (including APCO, IACP, IAFC, and NSA) as well as those of AICC, pointing out that incorporating an ability for alarm systems and security cameras to have a direct link to the Public Safety Answering Point (or "PSAP") would dramatically increase the number of false alarm signals. In its work with law enforcement, SIAC found that human intervention is the key to preventing false alarm dispatches. Pursuant to the protocols jointly developed by the alarm industry and the public safety community, the screening of alarm signals by trained professionals assisted by automated screening techniques has made it unnecessary for the PSAP to address 93 percent of alarms received by the central station. If the central station is bypassed, and alarms are sent by a variety of consumer-installed devices directly to the PSAP, then public safety dispatchers will be flooded with alarm signals, each requiring investigation and often dispatch of a response (since the PSAP will have no other way to ensure that there is no emergency). This will be such a severe drain on already scarce public safety resources that PSAPs will likely be forced to refuse to respond to *any* alarm signals – even those that may legitimately be reporting an emergency. Incorrect installation of alarm devices by a consumer will exacerbate the problem, with some devices possibly sending a false alarm signal over and over again.

The same issue arises with security cameras, as it will be difficult in many cases for the PSAP to interpret the context of the images sent by a security camera, and whether a threat is actually present. The poor quality or improper installation of such cameras will only worsen the situation.

As a result, the FCC must avoid taking a giant step backwards in the prevention of false alarm dispatches, by prohibiting direct communications by alarm systems, security cameras and other consumer devices with a PSAP, if there will be no human intervention to ensure that a genuine emergency exists.

Thank you for this opportunity to comment on this important issue.

**The Security Industry Alarm Coalition**



Stan Martin  
Executive Director