

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Technology Transitions Policy Task Force)
Seeks Comment on Potential Trials) GN Docket No. 13-5
)

**REPLY COMMENTS OF THE
ALARM INDUSTRY COMMUNICATIONS COMMITTEE**

The Alarm Industry Communications Committee (“AICC”), on behalf of its members¹ hereby replies to the comments of AT&T concerning the proposed features of trials relating to the transition from time-division multiplexing (TDM) to Internet Protocol (IP) networks and services. As shown herein, AICC urges the Commission to require trial participants to meet a number of specified criteria, including compliance with the National Fire Alarm and Signaling Code, to ensure the protection of alarm service customers before a trial is authorized. Customers and alarm providers must be notified before any trial is authorized. After authorization, the trial participant must notify customers and alarm companies well in advance of the discontinuance of TDM-based services. Finally, a trial must be reversible if it is not successful.

AICC member companies protect over 30 million residential, business and sensitive facilities and their occupants from fire, burglaries, sabotage and other emergencies. Protected

¹ Central Station Alarm Association (CSAA), Electronic Security Association (ESA), Security Industry Association (SIA), Bosch Security Systems, Digital Monitoring Products, Digital Security Control, Telular Corp, Honeywell Security, Vector Security, Inc., ADT Security Services, Inc., AES- IntelliNet, Alarm.com, Bay Alarm, Intertek Testing, Security Network of America, United Central Control, AFA Protective Systems, Vivint (formerly APX Alarm), COPS Monitoring, DGA Security, Security Networks, Universal Atlantic Systems, Axis Communications, Interlogix, LogicMark, Napco Security, Alarm Detection, ASG Security, Security Networks, Select Security, Inovonics, Linear Corp., Numerex, Tyco Integrated Security, FM Approvals, the Underwriters Laboratories, CRN Wireless, LLC and Axisstel.

facilities include government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, schools and universities. In addition to these commercial and governmental applications, alarm companies protect a large and ever increasing number of residences and their occupants from fire, intruders, and carbon monoxide poisoning. Alarm companies also provide Personal Emergency Response Systems (PERS) and medical alert services for obtaining ambulances in the event of medical emergencies. The alarm industry works hand in hand with the public safety community, including Public Safety Answering Points and police and fire departments, to focus government resources on actual, verified emergency situations.

The majority of alarm customers still rely on TDM-based plain old telephone service (POTS) as their underlying communications service. Virtually all customers of PERS are connected by POTS. Simply put, POTS provides the high reliability communications service necessary for alarm services. Moreover, POTS continues to operate during power outages, when consumers may be most vulnerable and in need of emergency services. Accordingly, AT&T's proposal could significantly adversely impact customers of residential and business alarm services.

In its comments, AT&T states that trial proposals should set forth the geographic area in which the trial would take place; the specific TDM-based services to be discontinued; the wireless and wireline IP-based services that will be available as alternatives, including competitive alternatives; other information the provider chooses to provide relating to the public-interest benefits of the trial; and the regulatory obligations that should be eliminated or forborn from prior to the trial. As part of the public interest showing, AT&T states that the trial proposals would explain in detail important information concerning the public interest such as

how E9-1-1 services will be provided. AT&T also states that the proposed plans should include information regarding "how the provider will deal with specialized services," such as alarm services. AT&T states that it "will work to develop solutions for customers with medical and alarm services that currently depend on wireline TDM service."² After the Commission approves a trial plan, AT&T states that the carrier would be able to discontinue services without further Commission action after notifying customers that they can switch to an alternative service.

Although AT&T's proposal recognizes the importance of ensuring that customers continue to have access to functioning alarm services, its proposal is not sufficient in this regard. AICC has laid out the criteria that communications service providers must meet to ensure that alarm services will continue to operate with IP-based services if and when TDM-based services are no longer available in reply comments in Docket No. 12-353, AT&T's "Petition to Launch a Proceeding Concerning the TDM-to-IP Transition." Specifically, to ensure the continued protection of alarm services customers, there must be available a service that meets the National Fire Alarm and Signaling Code requirements for a managed facilities-based voice network (MFVN); that allows line seizure; that appropriately encodes and decodes the tone messages sent by alarm panels; and that provides the ability for alarm service providers to see if the customer's broadband connection is lost. In addition, customers and alarm companies must be able to review and comment on the proposed service alternatives before any trial is allowed. Further, after a trial is authorized, trial participants must provide adequate notice of the exact day when TDM-based service will be discontinued to customers and alarm companies.

² AT&T Comments at 15.

The National Fire Alarm Signaling Code, which was developed under the direction of the National Fire Protection Association by a consensus group composed of many diverse stakeholders, including major broadband network providers such as AT&T, requires MFVN to give alarm companies and their customers a connection that is functionally equivalent to traditional public switched telephone network-based services. The Code provides that this can be done through the provision of a loop-start telephone, eight (8) hours of back-up power capacity for customer equipment , and twenty-four (24) hours of back-up power for MFVN communications equipment located at the communication provider's central office.

Customers also must have access to a communications service that allows line seizure, which allows an alarm panel to seize control of a phone line if alarm signals need to be transmitted to a monitoring center. In addition, the service must appropriately encode and decode the tone messages sent by alarm panels, and provide the ability for alarm service providers to see if the customer's broadband connection is lost.

An entity proposing a trial should be required to specify in its proposal the alternative services that are available in a proposed trial area and that meet these requirements. The proposal also should describe how each such service meets these requirements. Customers and alarm service providers must be given the opportunity to comment on whether the services are, in fact, available in the area and whether they meet the requirements. It cannot be presumed that alternative services are adequate or that they will be available. Recently, for example, Verizon has proposed to replace TDM service in parts of New York and New Jersey with a wireless offering called Voice Link which does not transmit the signals used by alarm systems and does not have sufficient back-up power. In addition, it cannot be presumed that alternative services are available or will remain available since many of the providers of such services have no

common carrier obligation to provide services to all or to continue to provide services.

Customers and alarm service providers should be able to raise these issues before any trial is authorized.

In addition, after a trial is authorized, customers and alarm service providers must be given notice of the exact day POTS service will be discontinued for an area well in advance of the discontinuance so that alarm customers and companies can take steps to ensure that alarm systems remain operational. It may even be necessary to require the trial participant to "phase-in" the discontinuance of POTS.

Today, when a customer switches to broadband service and the broadband provider bypasses the line seizure feature or the IP service distorts the signal, the alarm company usually can change to a different format or alarm panel at the customer premise to ensure the continued operation of the alarm service during a service call. While this is feasible when the alarm company typically faces only a few such instances at any given time, under AT&T's proposal, the possibility exists that a large number of alarm customers would lose their POTS service at the same time. In this case, the alarm company may not be able to properly test and reinstall, if necessary, the alarm services for all affected customers with no disruption in the provision of alarm services. Advance notice to customers and alarm companies of the date when POTS service will be discontinued would help alarm companies manage this issue. As an additional precaution, the broadband provider, at the time of installation, should advise the customer to contact the alarm company and test the alarm system. It is important to note that there are millions of installed alarm devices in homes and businesses that cannot automatically detect if the line seizure feature has been disconnected or bypassed. If sufficient notice and time is not provided to the customer and the alarm company to test all premises affected by a trial, the first

time a customer may realize his or her alarm service is not working properly may be when there is an emergency situation and the appropriate emergency service personnel are not dispatched to the premise.

Finally, AICC disagrees with AT&T's proposal that in some cases the TDM-IP trial will replace wireline service with wireless service and that customers should have no ability to switch back to wireline service after the trial. Even in the case where the wireless IP service has "problems," AT&T contends that the customers should simply be required to suffer through AT&T's period of trial and error to find a solution. AT&T contends that this is the "consumer-friendly approach" and that by making it clear that "the switch to a wireless IP option is mandatory and irrevocable, the Commission will prompt both the industry and consumers to identify any issues early in the transition... and to address those issues head-on, rather than simply turning back."³

As an initial matter, the involuntary and irrevocable change in service described by AT&T cannot be considered a trial. Rather, it is a discontinuance of common carrier service, the removal of common carrier and eligible telecommunications carrier obligations from AT&T, and the elimination of common carrier and eligible telecommunications carrier protections for consumers. There are far more issues and considerations involved in the discontinuance of common carrier services than the issues involved in a trial of new technology.

In any event, AT&T's conclusion, that a mandatory and irrevocable switch will spur the industry to solve promptly any problems identified, is exactly backwards. Rather, the best way to ensure that problems are minimized with any trial is to conduct a trial with consumers that have opted-in to the trial and to allow them to opt-out if the service is not satisfactory.

³ AT&T Comments at 18.

Based on the foregoing, AICC urges the Commission to adopt the recommendations contained herein in connection with any trials it may allow, to ensure that the trials do not adversely affect the alarm services of customers.

Respectfully submitted,

**ALARM INDUSTRY
COMMUNICATIONS COMMITTEE**

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