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January 27, 2014

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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Technology Transitions Task Force Request for Comment on Potential IP  
Interconnection Trials  
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition  
GN Docket Nos. 13-5 and 12-353  
**Notice of Oral Ex Parte Communications**

Dear Ms. Dortch:

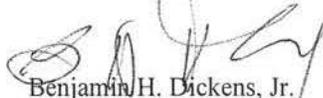
This notice of ex parte presentation is to report that Louis T. Fiore, Chairman of the Alarm Industry Communications Committee ("AICC"), Bill Signer, its legislative representative and the undersigned, its counsel, met with Gigi B. Sohn, of the Chairman's office, on January 23, 2014. The purpose of the meeting was to discuss issues in the referenced proceedings.

Specifically, these AICC representatives discussed the need to protect consumers' investment in home and business alarm services, including personal emergency medical alert devices and to protect against unfair competition in this market space, especially since the former Bell Operating Company affiliates have entered the alarm security markets. These same representatives also urged that the Commission help ensure a smooth transition and uninterrupted service for the alarm security sector and that compliance with the National Fire Alarm and Signaling Code (NFPA 72's MFVN Standard) be required.

These points are discussed in more detail in the attached document, which was discussed in the meeting.

Please feel free to contact me with questions about this correspondence.

Respectfully Submitted,



Benjamin H. Dickens, Jr.  
Counsel to Alarm Industry Communications Committee

cc: Gigi Sohn

## **Who Is AICC?**

- Committee of the Central Station Alarm Association (CSAA).
- Members from 3 principal trade associations representing 3 industry sectors:
  - Alarm monitoring industry (CSAA);
  - Alarm dealers and installers (Electronic Security Association);
  - Manufacturers (Security Industry Association);

## **Who is the Alarm Industry?**

- Protects approximately 50 million monitored residential and business customers.
- Serves a wide variety of important facilities, such as:
  - Government offices;
  - Banks;
  - Hospitals;
  - Power plants (including nuclear facilities), dam and water authorities;
  - Pharmaceutical plants and chemical plants;
  - Schools and universities.
- Members include both service and manufacturing:
  - 3,000 U.S. Central Stations, including proprietary stations;
  - 650 central stations listed by Underwriters' Laboratories;
  - 13,000 installing companies who are, overwhelmingly, small businesses (some overlap with central stations);
  - 250,000 employees;
  - A large number of manufacturers making equipment within the U.S.

## IP Transition Concerns

- Continued protection of the public interest through regulation:
  - Open Network Architecture requirements applicable to Bell Operating Companies should continue.
  - To ensure that consumer purchased alarm and Personal Emergency Response systems continue to function.
- Time frame:
  - Alarm companies need sufficient time to ensure smooth transition and uninterrupted service.
  - AT&T has projected up to 2 years for some alarm system compatibility issues to potentially be resolved.
- Lack of 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 VoIP providers or DIY installers bypass the line seizure device, rendering it inoperable.
- Inability to encode and decode the tone messages sent by alarm panels:
  - Customers' alarm monitoring services may not operate if IP services do not appropriately encode and decode the tone messages sent by alarm panels.
  - Can be solved by compliance with NFPA72's MFVN standard but many carriers do not comply.
- Inability to detect if connection is lost:
  - Unlike POTs, broadband connections do not allow alarm companies to detect when the connection is lost.
- Reliability:
  - Unlike POTS, broadband needs backup power if main power is lost.
  - The National Fire Alarm Signaling Code requires MFVN communications to have 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, but not all carriers are MFVN-compliant.