

LAW OFFICES
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP

2120 L STREET, NW
WASHINGTON, DC 20037

(202) 659-0830
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON
OF COUNSEL

PERRY W. WOOFER
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ
ENGINEERING CONSULTANT

HAROLD MORDKOFKY
BENJAMIN H. DICKENS, JR.
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO
MARY J. SISAK
D. CARY MITCHELL
SALVATORE TAILLEFER

March 7, 2014

ARTHUR BLOOSTON
1914 – 1999

WRITER'S CONTACT INFORMATION

bhd@bloostonlaw.com
202-828-5510

VIA ECFS

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

Re: Notice of Ex Parte
Technology Transitions, GN Docket No. 13-5; Computer III Further Remand
Proceedings: Bell Operating Company Provision of Enhanced Services, CC Docket No.
95-20; 1998 Biennial Regulatory Review – Review of Computer III and ONA Safeguards
and Requirements, CC Docket No. 98-10

Dear Ms. Dortch:

On March 5, 2014, Louis T. Fiore, Chairman, Alarm Industry Communications Committee (AICC); William Signer, Carmen Group; and the undersigned, on behalf of AICC, met with Matthew DelNero, Patrick Halley, and Tim Stelzig of the Wireline Competition Bureau. The purpose of the meeting was to discuss issues in the referenced proceedings.

During the meeting, AICC 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. AICC 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. AICC also discussed the continuing importance of Open Network Architecture (ONA) requirements to protect competition within the alarm industry.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Dickens, Jr.", written in a cursive style.

Benjamin H. Dickens, Jr.

Counsel for the

Alarm Industry Communications Committee

CC: Mr. Matthew DelNero
Mr. Patrick Halley
Mr. Tim Stelzig



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 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:
 - 650 central stations listed by Underwriters' Laboratories;
 - 13,000 installing companies who are, overwhelmingly, small businesses (some overlap with central stations);
 - A large number of manufacturers making equipment within the U.S.

IP Transition Concerns: Continued Protection of the Public Interest

Preservation of Competition

- Bell Operating Companies (BOCs) have already entered the alarm industry market.
- Intent of Section 275 should be preserved.
- Open Network Architecture (ONA) requirements applicable to Bell Operating Companies should continue.
 - FCC relies on the States under ONA.
 - BOCs seeking state deregulation in state-by-state campaign.
- Net Neutrality Remand presents additional opportunity to protect competition.

Protection for Consumers

- 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.
- 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.
- Ability 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 National Fire Alarm and Signaling Code's (NFPA 72) Managed Facilities Voice Network (MFVN) standard but many broadband/VoIP providers do not comply.

- Ability 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.
 - NFPA 72 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 broadband/VoIP providers are MFVN-compliant.