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April 4, 2014

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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; Open Internet Remand, GN Docket No. 14-28

Dear Ms. Dortch:

On April 2, 2014, Louis T. Fiore, Chairman, Alarm Industry Communications Committee (AICC); William Signer, Carmen Group; Steve Messner, consultant; and the undersigned, on behalf of AICC, met separately with Rebekah Goodheart and Louis Peraertz of Commissioner Clyburn's office; Amy Bender of Commissioner O'Rielly's office; Priscilla Argeris of Commissioner Rosenworcel's office; and Nicholas Degani of Commissioner Pai's office. The purpose of the meetings was to discuss issues in the referenced proceedings.

During the meetings, 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 and Net Neutrality to protect competition within the alarm industry.

These points are discussed in more detail in the attached documents, which were discussed in the meetings. Please feel free to contact me with questions about this correspondence.

Sincerely,

/s/ Benjamin H. Dickens, Jr.

Benjamin H. Dickens, Jr.
Counsel for the
Alarm Industry Communications Committee

CC: Rebekah Goodheart
Louis Peraertz
Amy Bender
Priscilla Argeris
Nicholas Degani

Alarm Industry Communications Committee
8150 Leesburg Pike, Suite 700, Vienna, VA 22182

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 30 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.

NFPA 72: Managed Facilities-Based Voice Network Standards

3.3.152* Managed Facilities-Based Voice Network (MFVN). A physical facilities-based network capable of transmitting real time signals with formats unchanged that is managed, operated, and maintained by the service provider to ensure service quality and reliability from the subscriber location to public switched telephone network (PSTN) interconnection points or other MFVN peer networks. (SIG-SSS)

A.3.3.152 Managed Facilities-Based Voice Network (MFVN). Managed facilities-based voice network service is functionally equivalent to traditional PSTN-based services provided by authorized common carriers (public utility telephone companies) with respect to dialing, dial plan, call completion, carriage of signals and protocols, and loop voltage treatment and provides all of the following features:

(1) A loop start telephone circuit service interface.

(2) Pathway reliability that is assured by proactive management, operation, and maintenance by the MFVN provider.

(3) 8 hours of standby power supply capacity for MFVN communications equipment either located at the protected premises or field deployed. Industry standards followed by the authorized common carriers (public utility telephone companies), and the other communications service providers that operate MFVNs, specifically engineer the selection of the size of the batteries, or other permanently located standby power source, in order to provide 8 hours of standby power with a reasonable degree of accuracy. Of course, over time, abnormal ambient conditions and battery aging can always have a potentially adverse effect on battery capacity. The MFVN field-deployed equipment typically monitors the condition of the standby battery and signals potential battery failure to permit the communications service provider to take appropriate action.

(4) 24 hours of standby power supply capacity for MFVN communications equipment located at the communication service provider's central office.

(5) Installation of network equipment at the protected premises with safeguards to prevent unauthorized access to the equipment and its connections.

When providing telephone service to a new customer, MFVN providers give notice to the telephone service subscriber of the need to have any connected alarm system tested by authorized fire alarm service personnel in accordance with Chapter 14 to make certain that all signal transmission features have remained operational. These features include the proper functioning of line seizure and the successful transmission of signals to the supervising station. In this way, the MFVN providers assist their new customers in complying with a testing

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procedure similar to that outlined in 26.2.7 for changes to providers of supervising station service.

The evolution of the deployment of telephone service has moved beyond the sole use of metallic conductors connecting a telephone subscriber's premises with the nearest telephone service provider's control and routing point (wire center). In the last 25 years, telephone service providers have introduced a variety of technologies to transport multiple, simultaneous telephone calls over shared communication's pathways. In order to facilitate the further development of the modernization of the telephone network, the authorized common carriers (public utility telephone companies) have transitioned their equipment into a managed facilities-based voice network (MFVN) capable of providing a variety of communications services in addition to the provision of traditional telephone service.

Similarly, the evolution of digital communications technology has permitted entities other than the authorized common carriers (public utility telephone companies) to deploy robust communications networks and offer a variety of communications services, including telephone service.

These alternate service providers fall into two broad categories. The first category includes those entities that have emulated the MFVN provided by the authorized common carriers. The second category includes those entities that offer telephone service using means that do not offer the rigorous quality assurance, operational stability, and consistent features provided by an MFVN.

The Code intends to only recognize the use of the telephone network transmission of alarm, supervisory, trouble, and other emergency signals by means of MFVNs.

For example, the Code intends to permit an MFVN to provide facilities-based telephone (voice) service that interfaces with the premises fire alarm or emergency signal control unit through a digital alarm communicator transmitter (DACT) using a loop start telephone circuit and signaling protocols fully compatible with and equivalent to those used in public switched telephone networks. The loop start telephone circuit and associated signaling can be provided through traditional copper wire telephone service (POTS—"plain old telephone service") or by means of equipment that emulates the loop start telephone circuit and associated signaling and then transmits the signals over a pathway using packet switched (IP) networks or other communications methods that are part of an MFVN.

Providers of MFVNs have disaster recovery plans to address both individual customer outages and widespread events such as tornados, ice storms, or other natural disasters, which include specific network power restoration procedures equivalent to those of traditional landline telephone services.

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