

**Before the  
Department of Commerce  
National Telecommunications and  
Information Administration**

In the Matter of	)	
	)	
Development of the State and	)	Docket No. 120509050-1050-01
Local Implementation Grant Program	)	
For the Nationwide Public Safety	)	
Broadband Network	)	
	)	

**COMMENTS OF THE  
ALARM INDUSTRY COMMUNICATIONS COMMITTEE**

The Alarm Industry Communications Committee (“AICC”), on behalf of its members, respectfully submits the following comments in response to the National Telecommunications and Information Administration’s (“NTIA”) Request for Information (“RFI”) in the above captioned docket.

It is respectfully submitted that, in proceeding with this and related programs, NTIA must take into account the benefits that could result from allowing limited access to quasi-public safety users under a prioritization protocol and that alarm service providers would be logical potential partners for such an undertaking.

The AICC also strongly supports the necessity for standards governing the devices that will be communicating with Public Safety Answering Points (“PSAPs”), and has urged the Federal Communications Commission to provide for adequate consultation on such standards. To this end, AICC has been engaged in discussions with the International Association of Chiefs of Police (“IACP”), National Sheriffs’ Association (“NSA”), Association of Public-Safety Communications Officials-International (“APCO”) and the National Emergency Numbering

Association (“NENA”) about the need for standards, and plans to continue working closely with these entities, to ensure such standards are developed.

AICC is comprised of representatives of the Central Station Alarm Association (CSAA), Electronic Security Association (ESA), Bosch Security Systems, Digital Monitoring Products, Digital Security Control, Telular Corp, Stanley Convergent (alarm division, formerly known as Honeywell Monitoring), Honeywell Security, Vector Security, Inc., ADT Security Services, Inc., AES- IntelliNet, Alarm.com, Bay Alarm, Intertek Testing, RSI Videofied, Security Network of America, United Central Control, Security Industry Association (SIA), 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, Protection One, Security Networks, Select Security, Inovonics, Linear Corp., Numerex, Visonic, FM Approvals, and the Underwriters Laboratories.

AICC member companies protect a wide range of sensitive facilities and their occupants from fire, burglaries, sabotage and other emergencies. Protected facilities include government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, and schools and universities. In addition to these commercial and governmental applications, alarm companies protect an increasing number of residences and their occupants from intruders, burglary and fire. Alarm companies also provide medical alert services for obtaining ambulances in the event of medical emergencies.

AICC has been engaged in discussions with the public safety community, including the Public Safety Spectrum Trust (PSST), concerning the implementation of the nationwide public safety broadband network, which is now under the auspices of FirstNet. In the event that FirstNet determines that the public safety network would benefit from allowing limited access to

quasi-public safety users under a prioritization protocol, alarm service providers would be logical potential partners for such undertaking; but in any event, the alarm industry has a vested interest in making sure that any access to PSAPs using new technologies is structured in a way that will not hinder the ability of public safety entities to respond to legitimate, verified emergencies.

As the RFI recognizes, assignment of priority and selection of entities seeking access to or use of the nationwide public safety interoperable broadband network will be an issue with which the relevant entities will need to cope.<sup>1</sup> In the context of the Federal Communications Commission's NG911 proceeding,<sup>2</sup> many parties filed comments proposing the use of certain devices which may directly contact PSAPs without human interaction or verification. As AICC has indicated in those proceedings, such devices may overload PSAPs already handling high volumes of calls with false alarms.<sup>3</sup> Therefore, any consultation measures NTIA adopts should include an avenue for discussion of such issues, with an eye toward the development and implementation of appropriate standards to avoid negative consequences to the extent possible.

During the FCC's NG911 proceeding, AICC, IACP, NSA, APCO, and NENA agreed upon the need for such standards with regard to device-initiated alarm signals. As the country advances toward a ubiquitous national public safety broadband network, AICC looks forward to working with these entities, FirstNet and NTIA, in conjunction with other consulting parties, to ensure that appropriate standards are developed and implemented.

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<sup>1</sup> National Telecommunications and Information Administration Request for Information, Docket No. 120509050-1050-01, Federal Register Vol. 77, No. 95, at 28857 (May 16, 2012).

<sup>2</sup> See *In the Matter of Framework for Next Generation 911 Deployment*, PS Docket No. 11-153.

<sup>3</sup> See, e.g., Reply Comments of AICC, PS Docket Nos. 10-255, 11-153; filed February 2, 2012.

Respectfully submitted,

**Alarm Industry Communications Committee**

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