

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

In the Matter of ) ) Wireline Competition Bureau Short Term ) Network Change Notification filed by ) Verizon New England Inc. ) d/b/a Verizon Massachusetts ) ) Wireline Competition Bureau Short Term ) Network Change Notification filed by ) Verizon New Jersey Inc. ) ) Wireline Competition Bureau Short Term ) Network Change Notification filed by ) Verizon Pennsylvania Inc. ) )	Report No. NCD-2365  Report No. NCD-2372  Report No. NCD-2373	<p style="text-align: center; font-weight: bold; font-size: 1.2em;">ACCEPTED/FILED</p> <p style="text-align: center; font-weight: bold; font-size: 1.2em;">JUL - 7 2014</p> <p style="text-align: center; font-weight: bold; font-size: 0.8em;">Federal Communications Commission Office of the Secretary</p> <p style="text-align: center; font-weight: bold; font-size: 1.5em;">RECEIVED</p> <p style="text-align: center; font-weight: bold; font-size: 1.2em;">JUL 15 2014</p>
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FCC-Competition Policy Division

**COMMENTS OF THE  
ALARM INDUSTRY COMMUNICATIONS COMMITTEE**

The Alarm Industry Communications Committee (“AICC”), on behalf of its members<sup>1</sup> hereby files comments on the network change notifications filed by Verizon New England Inc. d/b/a Verizon Massachusetts, Verizon New Jersey Inc. and Verizon Pennsylvania Inc. to retire copper in the Lynnfield Massachusetts wire center, Farmingdale New Jersey wire center and Hummelstown Pennsylvania wire center, respectively, and "to serve all customers over a fiber infrastructure." AICC previously filed comments in connection with Verizon's network change

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<sup>1</sup> 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, AES-Intellinet, Alarm.com, Bay Alarm, Intertek Testing, NetOne, Inc. (formerly, Security Network of America), United Central Control, AFA Protective Systems, Vivint (formerly APX Alarm), COPS Monitoring, DGA Security, Universal Atlantic Systems, Axis Communications, Interlogix, LogicMark, Napco Security, Alarm Detection, ADS Security, ASG Security, Security Networks, Select Security, Inovonics, Linear Corp., Numerex, Tyco Integrated Security, FM Approvals, Underwriters Laboratories, CRN Wireless, LLC and ipDatatel.

functions like line seizure and the detection of a loss in communications path and tone messages sent by the alarm panel are properly encoded and decoded. In addition, because the TDM-based network was engineered to be highly reliable, with quality of service standards and because copper lines have an independent power source, traditional telephone service over copper lines has provided alarm customers with a highly reliable service that they have come to expect and rely on. Accordingly, any changes to the network should ensure that these customers continue to receive a highly reliable service. At a minimum, they must be informed of any changes that affect their service.

**Consumer's Affected by Copper Retirement Must be Provided With Functionally Equivalent Service and Facilities and Notified of the Need for Backup Power**

Verizon's response to AICC's comments in connection with the proposed network changes in New York and Virginia demonstrates that the Commission's network change notification process is not sufficient to protect consumers when the carrier seeks to use that process to retire copper facilities and replace them with fiber.<sup>3</sup> It further demonstrates that Verizon should be subject to the Commission's Section 214 process because the network changes to retire copper will result in a reduction or impairment of service and will impair the adequacy or quality of service to consumers in the affected areas. Two aspects of Verizon's response leads to these conclusions: (1) Verizon's comments regarding its compliance with NFPA 72 and managed facilities-based voice network (MFVN) standards in New York City; and (2) Verizon's comments concerning the need for consumers to maintain and purchase backup battery power for their communication service to remain operational during a power outage.

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<sup>3</sup> See, Verizon New York, Inc. and Verizon Virginia LLC Response, *Wireline Competition Bureau Short Term Network Change Notification filed by Verizon New York Inc.*, Report No. NCD-2353 and *Wireline Competition Bureau Short Term Network Change Notification filed by Verizon Virginia LLC*, Report No. NCD-2354, dated May 28, 2014 (Verizon Response).

Since Verizon acknowledges that it can comply with this standard, it should do so in all localities, because all customers, including those who are not in New York City, have the same need for communication services that meet the NFPA 72 standard, or its equivalent. At a minimum, to the extent Verizon does not comply with this standard or its equivalent, consumers should be notified before Verizon retires copper facilities and replaces them with fiber.

In its response, Verizon also acknowledges that customers on Verizon's fiber network will no longer be able to receive service during a power outage without battery backup power. Further, Verizon acknowledges that some of its current equipment requires a battery that is not readily available to consumers, it is expensive, and it has an insufficient operation life, although Verizon states that it is "rolling out a new way to give customers even more control over backup battery for our traditional voice customers during commercial power outages."<sup>5</sup> Thus, Verizon states that for customers in the New York and Virginia wire centers "we will be making available a battery back-up for voice services that uses standard D Cell batteries that are more readily available and replaceable, and provides substantially longer back-up power, than the 12-volt sealed lead acid batteries that we used with most fiber installations."<sup>6</sup> However, Verizon also states that its tariffs "make clear that providing power is not part of the services we are offering, and that ultimately, the customer is responsible for providing power."<sup>7</sup>

Tariff notification is not sufficient to inform consumers of this significant change in their service. This is all the more true as Verizon's website informs consumers that its Standard Phone service "works during emergencies and power outages."<sup>8</sup> Rather, consumers should be given actual notice of the necessity for backup power when copper facilities are replaced with fiber.

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<sup>5</sup> Verizon Response at 6-7.

<sup>6</sup> Verizon Response at 7.

<sup>7</sup> Verizon Response at n.8.

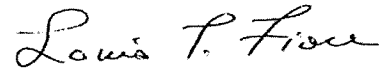
<sup>8</sup> <http://www.verizon.com/home/phone/>, last visited on May 19, 2014.

**Conclusion**

As shown herein, consumer's affected by copper retirement must be provided with functionally equivalent service and facilities and notified of the need for backup power. In addition, this type of network change will result in a reduction or impairment of service and it will impair the adequacy or quality of service to customers in the affected areas. Accordingly, Verizon should be required to seek Section 214 authority before it is authorized to retire the copper loops.

Respectfully submitted,

**ALARM INDUSTRY  
COMMUNICATIONS COMMITTEE**



By: \_\_\_\_\_  
Louis T. Fiore  
Chairman

Dated: July 7, 2014

**Certificate of Service**

I hereby certify that on July 7, 2014, a copy of the forgoing **Comments of the Alarm Industry Communications Committee** was sent via electronic mail and U.S. Mail to:

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