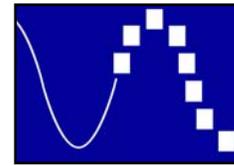


July 17, 2009



The VON Coalition

Secretary
Standards Council
1 Batterymarch Park
Quincy, MA 02169-7471

Re: TIA Log No.: 961

To Whom It May Concern:

As leaders in the field of internet communication technology development, the VON Coalition hereby submits the following comments on the Proposed Tentative Interim Amendment Log No. 961, Managed Facilities-based Voice Network (MVFN). The proposed amendment raises two issues of concern: (1) the limitation to providers of “managed facilities-based voice” service is unnecessarily narrow; and (2) the requirement that the voice service provider design and monitor standby power supply to ensure 8 hours of standby power is unnecessary. Both of these would put non-facilities-based voice service providers at a competitive disadvantage without providing any significant benefits to the public. Accordingly, the proposed amendment should be modified to include all providers of voice services that are technically capable of transmitting the appropriate signals to a connected alarm service and to eliminate the backup power requirement.

The proposed amendment implicitly suggests that MVFN service providers necessarily provide more rigorous quality assurance and operational stability than non-facilities-based voice service providers. The NFPA should not accept this dubious proposition without proof. Indeed, we are aware of no technical analysis or study in support of this claim. The only question the NFPA should be interested in is whether a particular voice service is technically capable of

transmitting the appropriate signals to a connected alarm service. Any voice service that is so capable and complies with the needed testing requirements should be included in the standard.

The requirement that the voice service provider design and monitor standby power to ensure 8 hours of standby power is unnecessary for at least two reasons. First, a 2003 report by the Institute of Electrical and Electronics Engineers (IEEE) indicates the average Customer Average Interruption Duration Index (CAIDI) was under 240 minutes (or 4 hours) through the year 2005 (excluding major disasters, such as hurricanes).¹ In fact, according to this report, CAIDI declined by 7% from 2000 to 2005. This indicates that an 8 hour backup power requirement far exceeds what is needed for most power outages. Second, and more fundamentally, the customer is in the best position to know all of his power needs and to make decisions about how much backup capacity to have. Only the customer knows the various devices and services (including alarm monitoring) that will need backup power. Any decisions about backup power are best left to the discretion of the customer.

Sincerely,

/s/

The VON Coalition

¹ IEEE 1366-2003, Power Engineering Society, IEEE Benchmarking 2005 Results, July 2006, Working Group on Distribution Reliability.