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The Honorable Ruth Ann Palumbo
Kentucky House of Representatives
702 Capitol Avenue
Annex Room 370B
Frankfort, KY 40601

Re: Senate Bill 99

Dear Representative Palumbo,

On behalf of ADT, the leading provider of electronic security and alarm monitoring services in the U.S. and Canada, with an office in your district, I am writing to express our opposition to Senate Bill 99, which would allow for the discontinuation of Plain Old Telephone Service (POTS) in Kentucky.

Our many customers in the state rely on our services to help ensure the safety of their families, homes and businesses. They trust ADT to assist in case of emergency, and we take this responsibility seriously. If passed in its current form, some citizens of the Commonwealth may find themselves suddenly without reliable access to the life-safety alarm services on which they've come to rely.

Many of our customers, like the one who alerted ADT to this bill, rely on POTS to carry alarm signals to and from monitoring companies like ADT. Some also use POTS for their Personal Emergency Response Systems (PERS) and medical alert services. ADT accepts that the transition from POTS is a natural progression towards new technology, and is actively working to develop best processes and an acceptable timeline where POTS is discontinued; however, the safety of everyday Kentuckians could be jeopardized if this is not done in a pragmatic, thoughtful way.

Outlined below are some principles to which legislation should adhere when considering deregulation of landline telephones.

- **Broadband providers need to verify systems compatibility in order to prevent loss of life saving and health related alarm services transitioned from POTS to new technology.**
- **New technology must be in compliance with National Fire Protection Association (NFPA) 72 standards for managed facilities-based voice networks (MFVN), or an equivalent, to ensure alarm signals are properly transmitted to and received by alarm monitoring stations, and to verify that line seizure features are enabled.**
- **Proper customer and other common carrier notifications must be promulgated regarding areas affected by POTS discontinuation to advise customers of their rights and responsibilities and to prevent anti-competitive activity.**
- **Sufficient adoption time period must be provided to service specific customer needs, i.e., roll service trucks to address technology issues that will undoubtedly arise due to the scale, and unprecedented nature, of this change, in order to provide system updates to what could be tens of thousands of Kentuckians.**

- **Consumers are well served by individual state action which builds upon the ongoing work by the FCC and other national groups (i.e., NARUC). Policymakers are advised to wait until the completion of FCC authorized TDM-to-IP trials, which have been proposed by AT&T in rural Alabama and suburban Florida communities, before enacting legislation.**

I recognize many stakeholders have already weighed in on this issue, sharing detailed, and often highly technical, comments. On behalf of ADT, I would like to offer our considerable expertise in this area to clearly address how Kentucky consumers will be affected.

To this end, our Government Affairs department may be a helpful resource. I have asked these colleagues to reach out directly to you and your staff to help address my constituent concerns and to offer support related to the above recommendations. Together, I know the Kentucky Legislature can develop a policy that balances everyone's needs.

At this time, I respectfully ask that SB 99 not move forward without additional study.

Sincerely,

Gregory Turner