

ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS (ACTA)

MEETING DATE: 3/13/2003

Contribution

TITLE: Proposed New Alarm Dialing Equipment Instructions

SOURCE*: Cliff Chamney, for the ACTA ad hoc Group on Customer Instructions

PURPOSE: Decision

DISTRIBUTION TO: ACTA All

ABSTRACT

A question was raised to the ACTA secretariat about the ACTA Customer Information Requirements by a responsible party (RP) who was concerned about the instructions in the Alarm Dialing Equipment section, at the end of the document. This RP was concerned that the wording might work to prevent connection of its alarm dialing equipment to the network.

The ad hoc group proposes that ACTA remove the existing Alarm Dialing Equipment instructions and replace them with the language in Annex A. Also, the group proposes the new and old instructions effectiveness' overlap for long enough for RPs to manage their inventories. The original instructions would sunset. In addition, the group proposes that the new instructions and some unresolved issues be offered to the most appropriate SDO for further improvement, should the SDO desire to take such action. A document describing unresolved issues has not been prepared, and the ad hoc group chair offers to take the action item to do that.

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Summary

1. A question was raised to the ACTA secretariat about the ACTA Customer Information Requirements by a responsible party (RP) who was concerned about the instructions in the Alarm Dialing Equipment section, at the end of the document. This RP was concerned that the wording might work to prevent connection of its alarm dialing equipment to the network.

2. An ad hoc group was formed to address this, and I agreed to chair the effort. The other participants in the group have been John Bipes, Trone Bishop, Jim Haynes, Anh Nguyen, Jimmy Salinas, and Steve Whitesell. The issues have been complex and the discussions have at times been spirited. Some members of the group have not been heard from recently, and may or might not have objections in the full ACTA meeting. In any case, I believe this group has completed a distinct phase of its work requiring full ACTA action, and may have gone as far as it can.

3. After formation of the ad hoc group a second RP voiced concern that their greatly different type of alarm dialing equipment was being barred by ACTA from connection. One concern of the ad hoc group is that it seems wrong for ACTA Customer Instructions to bar any type of equipment from connection to the network. Yet that was what ACTA appeared to have done.

4. After extensive discussion, and several false starts at attempted proposed instructions, the ad hoc group has finally agreed to propose a change to the Alarm Dialing Equipment section. This section would read as per Annex A to this contribution. The group agrees that the words of Annex A do respond directly and properly to the concerns of the complaining RPs about the present instructions. The existing diagram is proposed to be retained. A second part of the agreement was that although some issues are not adequately addressed in the proposal, the concerned RPs should not be required to wait

longer for their relief. Also, this group does not necessarily have the collective expertise to address those issues properly.

5. The active ad hoc group proposes that ACTA remove the existing Alarm Dialing Equipment instructions and replace them with the language in Annex A. Also, the group proposes the new and old instructions' effectiveness overlap until RPs have had time to manage their inventories, when the original instructions would sunset. In addition, the group proposes that the new instructions and the identified issues be offered to the most appropriate SDO for further improvement, should the SDO desire to handle that action. A document collecting the unresolved issues has not been prepared. The ad hoc group chair offers to take the action item to do that.

History

1. The complaint on which the present alarm dialing equipment instructions were based came from a technical advisor to a congressman. His basic complaint was that inexpensive personal health alarm dialers were being offered to at-risk people by hospitals. Those alarms were equipped with a plug for an RJ11 jack, not a plug for a RJ31X jack, and were installed by non-technical family members. In the cases when an alarm occurred while the phone (or fax, modem, answering machine etc.) was in use people may have been imperiled because the off-hook device could not be pre-empted by the alarm. These instructions were drafted for ACTA by TR-41.11, and after some edits were published by ACTA in March 2002.

2. The first complaint received after the present alarm dialing equipment instructions were published came from a vendor who sold an alarm dialer that incorporated a plug for an RJ11 jack. This alarm comes with "pre-emptive" adjuncts that plug in between the other terminals and the house wiring. It is listed to a UL standard. The danger the ad hoc group found with this type of installation is it could be accidentally and easily be defeated by: a) plugging a new terminal (such as an answering machine) into an unused jack and not adding a pre-emptive adjunct; or b) by removing a terminal and its pre-emptive adjunct (for cleaning or to rearrange the house), and forgetting to restore the adjunct when restoring the terminal to the wall jack. While the ad hoc group might view this system as being intrinsically less safe than a RJ31X installation, some of us were not convinced ACTA had, in its authority from the FCC, the power to relegate a type of alarm dialing equipment to the junk pile. Isn't it the consumer's responsibility to assure he has purchased the right type product, and that it has been installed correctly? After all, after a RJ31X has been installed even it can be defeated by installing an RJ11 between it and the NID, and plugging a phone into it. Some say this has been done and the results have been costly.

3. The second complaint to the existing instructions came from a vendor who sells into the nursing home market. There is one phone and one line per resident. This phone has a plug for an RJ11, and a panic alarm button. If a resident needs assistance he can press the button and the phone will autodial a nursing station. The phone system can be expanded

to react to relay contact closure in a health monitor. There is no parallel phone on the line that needs preemption. Thus there is no need for a RJ31X.

4. In our effort to express details of various equipment and situations, two new terms were developed. These are defined in the proposed customer instructions.

Principles

The main principles on which the group developed its proposed language were expressed in these excerpts from e-mail discussions.

A. Conclusions by Trone Bishop on 10/25/2002.

- 1- Neither Part 68 nor TIA-968 contain a requirement that Alarm Dialers use an RJ31X.
- 2- If we wanted TIA-968 to contain such a requirement, what network harm justification could we cite?
- 3- ACTA cannot establish technical requirements.
- 4- Some manufacturers of Alarm Dialing equipment will specify an RJ31X because it provides the high quality service and the best protection for the consumer.
- 5- Other manufacturers will make Alarm Dialing equipment that needs to be placed in front of every device on the line in order to provide service that is functionally equivalent to using an RJ31X because they believe it meets a customer need for a simpler installation.
- 6- Still other manufacturers of Alarm Dialing equipment are willing to advertise that an ordinary RJ11 can be used for their product even if the resulting service is not functionally equivalent to using an RJ31X (i.e., if another device is off hook, the dialer will not be able to seize the line).
- 7- Since ACTA must be technology neutral, how can ACTA prohibit any of the above arrangements?
- 8- ACTA should not have technical requirements buried in its customer instruction requirements.
- 9- In my opinion, it is entirely appropriate for ACTA to say that when the manufacturer requires an RJ31X for an alarm dialer, they must include an explanation of how to appropriately wire the RJ31X so that it actually provides a series connection.
- 10- In my opinion, it is also entirely appropriate for ACTA to say that when a manufacturer provides a system that is functionally equivalent to an RJ31X, that customer instructions must be explicit with respect to how to achieve a functionally equivalent installation.
- 11- With respect to the situation where a manufacturer of Alarm Dialing equipment prefers to advertise that his products can use an ordinary RJ11 (even if it is not functionally equivalent to an RJ31X), there seems to be little ACTA can do about it.
- 12- How can ACTA mandate that an RJ31X or functionally equivalent system must be used?

The network harm reference in Trone's #2 stimulates a parallel question.

If we wanted Customer Instructions to contain such a requirement, what justification could we cite?

B. Tenets by Steve Whitesell on 1/20/2003

1. The FCC has dictated that ACTA specify instructions to be provided to the user. They didn't provide a lot of guidance here, but presumably the instructions should include information on how to connect the equipment to the network so that it will work as intended.
2. We want the guy who raised this issue with the FCC and threatened to go to his Congressman to have legislation passed to feel we have addressed his issue.
3. We know how an RJ31X should be installed for this type of equipment, and ACTA should require that information be provided to the user. It should be done in a manner that does not preclude functionally-equivalent wiring arrangements.
4. We do not know how these functionally equivalent wiring arrangements should be installed so we can't include anything in the ACTA mandated instructions about them, except for possibly admonishing the user to follow the instructions provided for using those functionally equivalent arrangements.
5. The actual text provided to the user needs to be strongly worded about installing the equipment properly and seeking knowledgeable help if you don't understand how to do it.

The group may or might not have addressed Steve's #2. The individual who originally brought the RJ31X issue to ACTA was adamant that other installations of equipment are inadequate. ACTA may not be able to please everybody, but ACTA must not extend its reach beyond its authority. Some of us do not see how ACTA has the right to arbitrarily decide that some equipment is good enough for safety of person and property, and some is not. Safety is the primary job of others in the industry, and safety is a function of government at all levels. Some of us think ACTA making sure the consumer has enough information to decide whether equipment is suitable for his use, and information on how to connect it, may be both necessary and sufficient for alarm dialing equipment.

As Trone asked in his #12,

"How can ACTA [in customer instructions] mandate that an RJ31X or functionally equivalent system must be used?"

One example of a type of alarm dialing equipment considered in this context is basement water level alarms. This alarm monitors for water in a vacation home basement, and dials a programmable phone number (possibly a winter home) when water is detected. This alarm will dial repeatedly until it gets a response. Is it appropriate for ACTA to say this alarm must be installed with a RJ-31X jack, so the telephone on the premises (unused for long periods when the family is not there), will be automatically disconnected, when this alarm can seize the line without the jack? Some would say that could cost significant resources without any benefit.

The Personal Health Alarm Issue

If a hospital perceives that a poor family could benefit from an alarm of the kind: "I've fallen," and perceives that it should offer a personal alarm with a plug for an RJ11 jack (but not a RJ31X jack and installation money), is the person potentially better off than without any alarm at all? It is difficult for some of us to see how ACTA should take that choice away from the consumer and his health care provider. It may be appropriate for ACTA to mandate that such alarm dialers include instructions to inform the consumer of the risk he is taking. Does ACTA's responsibility in this area go beyond that? Some of us think not.

Recommendations

1. New Customer Instructions Requirements should be issued, to remove a perceived restriction on connection of equipment.
2. The new requirements should be effective immediately upon approval by ACTA interest segment representatives, to remove the restriction as soon as possible.
3. The old requirements should sunset after sufficient time to allow vendors to manage their inventories.
4. The ad hoc group chair should summarize the additional unresolved considerations and submit them to ACTA. ACTA should then consider whether to forward those issues to the most appropriate SDO with a request for their consideration.

Annex A

Alarm Dialing Equipment:

Alarm dialing equipment (equipment code "AL") includes dialers associated with fire and intrusion protection systems, medical alert systems, equipment failure notification systems, and similar event reporting systems. The critical nature of such equipment calls for clear installation instructions so that the equipment will operate as intended. In addition, customers must have clear testing instructions in order to verify proper operation after installation.

The customer information requirements for alarm dialing equipment vary depending upon whether the equipment has "Line Seize" capability and whether that capability is provided by a properly installed RJ31X or RJ38X jack or by utilizing a functionally-equivalent arrangement.

Definitions. For the purpose of these customer information requirements, the following definitions are applicable.

Line Seize capability - A feature of some alarm dialing equipment that allows the equipment to disconnect other equipment connected to the same phone line and initiate an event reporting call even when other equipment (telephone, answering system, computer modem, etc.) on the same line is being used.

Functionally Equivalent arrangement - Equipment and wiring that provides Line Seize capability without the use of an RJ31X or RJ38X jack, *i.e.*, it allows the alarm dialing equipment to disconnect other equipment connected to the same phone line and initiate a call even when the other equipment is in use.

Requirements. The customer information accompanying alarm dialing equipment shall include installation instructions, testing instructions, notice (a) below and one additional notice from (b), (c), or (d) below, whichever is applicable.

a) Notice For All Alarm Dialing Equipment

For all alarm dialing equipment, provide a cautionary notice advising that the equipment must be installed according to manufacturer instructions in order to ensure proper operation and must be tested according to manufacturer instructions immediately after installation, and periodically thereafter, in order to verify proper operation. Use words similar to the following:

Caution - To ensure proper operation, this equipment must be installed according to the enclosed installation instructions. To verify that the equipment is operating properly and can successfully report an alarm, this equipment must be tested immediately after installation, and periodically thereafter, according to the enclosed test instructions.

b) Notice for Equipment with Line Seize Capability using an RJ31X or RJ38X Jack

For alarm dialing equipment with Line Seize capability by means of an RJ31X or RJ38X jack, provide a cautionary notice that the RJ31X or RJ38X jack must be installed

correctly in order for the Line Seize feature to work properly when other equipment connected to the same line is in use. Use words similar to the following (where RJ38X may be used in place of RJ31X, if appropriate, and the name and/or model number of the equipment may be substituted for the term “alarm dialing equipment” in the text and figure):

Caution - In order for "alarm dialing equipment" to be able to seize the phone line to report an alarm or other event when other customer equipment (telephone, answering system, computer modem, etc.) connected to the same line is in use, "alarm dialing equipment" must be connected to a properly installed RJ31X jack. The RJ31X jack must be connected in series with, and ahead of, all other equipment attached to the same phone line. Series installation of an RJ31X jack is depicted in the figure below. If you have any questions concerning these instructions, you should consult your telephone company or a qualified installer about installing the necessary jack and alarm dialing equipment for you.

(Use existing RJ31X figure.)

c) Notice for Equipment Utilizing A Functionally Equivalent Arrangement to Provide Line Seize Capability

For alarm dialing equipment that provides Line Seize capability by means of a functionally equivalent arrangement as defined above, provide a cautionary notice that the equipment must be installed according to manufacturer instructions in order for the alarm dialing equipment to work properly when other equipment connected to the same line is in use. Use words similar to the following:

Caution - Verification of Line Seize capability should be made immediately after installation, and periodically thereafter, in order to ensure that this equipment can initiate a call even when other equipment (telephone, answering system, computer modem, etc.) connected to the same line is in use.

d) Notice for Alarm Dialing Equipment without Line Seize Capability

For alarm dialing equipment without Line Seize capability, provide a cautionary notice advising that the equipment is not able to report an alarm when other equipment connected to the same line is in use. Use words similar to the following:

Caution - This equipment cannot report an alarm when other equipment (telephone, answering system, computer modem, etc.) connected to the same phone line is in use.