December 10, 2008

Kathryn Berthot  
Division Chief  
Enforcement Bureau  
Spectrum Enforcement Division  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Notification of Possible Non-Compliance

Dear Division Chief Berthot:

The Administrative Council for Terminal Attachments (ACTA) hereby submits information regarding potential irregularities of non-compliance with Part 68 of the Commission’s rules.

The ACTA is an open organization committed to: (1) adopt technical criteria and to act as the clearing-house, publishing technical criteria for terminal equipment developed by ANSI-accredited standards development organizations; and (2) establish and maintain a registration database of equipment approved as compliant with the technical criteria. The ACTA is jointly sponsored by the Alliance for Telecommunications Industry Standards (ATIS) and Telecommunications Industry Association (TIA). In support of its mission and to assist the FCC with identifying Part 68 non-compliance, ACTA informs the FCC of instances of non-compliance with Part 68 of which it becomes aware.

The attached documents submitted to ACTA through its online contribution template, which is available to the general public at http://www.part68.org/documents/resources/ACTA_Contribution_Template.dot, may indicate Part 68 non-compliance by a terminal equipment manufacturer that may adversely impact the public telephone network. Should you need additional information, please contact the person or persons listed as contacts on the attached documents.
If you have any other questions, or if I can provide additional information, please do not hesitate to contact me at 202-434-8830 or tgoode@atis.org.

Sincerely,

Thomas Goode
ATIS General Counsel

CC:
Cathy Zima, Deputy Division Chief, Wireline Competition Bureau, Industry Analysis Technology Division
Administrative Council for terminal Attachments (ACTA)
Care of ATIS
Paul Anderson
ACTA Administrator ATIS
panderson@atis.org
(202) 434-8654
1200 G Street, NW, Suite 500
Washington, D.C. 20005

Subject: Part 68 Non registered Terminal Equipment

Dear Mr. Anderson,

While reading the minutes of the March 6 meeting, I notices ATA is concerned with non compliant equipment.
It has come to my attention that a number of Intercom Voice Switches are being advertised and may be sold in the USA while these products are not listed in the ACTA approved terminal database or in the SDoc or Wavered TTE sections of the ACTA web site. Other Intercom Switches are in the ACTA database. Typically these devices are installed by VOIP telephony service providers in multi-dwelling units to interface to the building intercom system. The switches toggle the subscriber apartment wiring between the VoIP telephone service and the MDU intercom telephone line. The PSTN telephone line passes through the Intercom System when it is in the idle state and is connected to the Intercom Switch by way of the apartment riser wiring. Even though a subscriber purchases telephone service from a VOIP provider, the ILEC telephone line may remain connected to the intercom system. A single shot variety device is used in households to switch the internal house wiring from the PSTN to the VOIP service provider.

Since the privatization of many technical and administrative functions mandated by Part 68, it is possible there is confusion in the marketplace about the importance of FCC Part 68 rules.

For this reason, I respectfully ask if you could pass this information to the FCC or put me in touch with appropriate person at the FCC.

Yours truly,

Claude Arpin Eng.
President, Sittelle Technologies Inc. claude.arpin@sitelletech.com

Sittelle Technologies Inc., 159 – 202 Ave., St-Hippolyte, QC, J8A 1V8, 514-519-1133
The following intercom switches are not listed at this time in the ACTA database:

ATX Incorporated
1-501 Clements Road West
Ajax, ON L1S 7H4 Canada
Tel: (905) 428-6068 or (800) 565-7488 (USA & Canada)
Fax: (905) 427-1964 or (866) 427-1964 (USA & Canada)
http://www.atxincorporated.com/products/cabl/subs/voip
Digital Phone Connect Intercom Switch (DMDPCI)
Digital Phone Connect Single-Shot Switch (DMDPC)

Tii Network Technologies, Inc.
141 Rodeo Drive
Edgewood, NY 11717
Phone: 631-789-5000
Toll Free: 888-844-4720 Fax: 631-789-5063
http://www.tiinettech.com/voip.php
The Voice Intercom Switch (VIS)

The following switches are listed in the ACTA database:

Tii Network Technologies, Inc.: US: TIIOT00BSVM

Sittelle Technologies Inc. 159 – 202 Ave.,
St-Hippolyte, QC, J8A 1V8, Canada
http://part68.org/tteSearchResults2.aspx?rpc=6CA
IVI6000: US: 6CAOT01BIVI6000
RPS3001: US: 6CAOT01BRPS3000

cc: Mr. Claude Beaudoin
Industry Canada

Sittelle Technologies Inc., 159 – 202 Ave., St-Hippolyte, QC, J8A 1V8, 514-519-1133
MEETING DATE:  June 12, 2008
TITLE: Industry Concerns on Part 68 Compliance
SOURCE*: Bob Buck, President, Telephone Equipment Supply, Inc.
PURPOSE: Discussion
DISTRIBUTION TO: ACTA

ABSTRACT
Discussion on equipment manufactured that exceed the amount of power that can be drawn under part 68.

NOTICE
This is a draft document and thus, is dynamic in nature. It does not reflect a consensus of ACTA and it may be changed or modified. ACTA makes no representation or warranty, express or implied, with respect to the sufficiency, accuracy or utility of the information or opinion contained or reflected in the material utilized ACTA further expressly advises that any use of or reliance upon the material in question is at your risk ACTA shall be liable for no damage or injury, of whatever nature, incurred by any person arising out of any utilization of the material. It is possible that this material will at some future date be included in a copyrighted work by ACTA.

* CONTACT:
Telephone Equipment Supply, Inc.
Bob Buck
President
39199 East Thorpe Ave.
Deer River, MN. 5663
(218) 246-2326
bob@tesmw.com
Some terminal equipment manufacturers are drawing more than 50μA of power that is allowed from the public telephone network under part 68 when the telephone is on hook. These manufacturers advertise their products for use behind Centrex and residential telephone lines and when you confront them that the FCC part 68 allows only 50 μA to be used they will tell you it's for PBX use. They are clearly marketing to distributors, dealers, state, federal, local governments, Telephone Company's, and residential users.

Please don't get me wrong most manufacturers build their products to meet part 68 specifications and use batteries or transformers when additional power is needed. The handful that don't if left unregulated could cause problems to the public network.

I would like to disclose that we are the only manufacturer of line powered message waiting light and Caller ID units that received FCC approval before changes limiting the power draw in 1997 to 50 μA. Some of the telephone manufacturers that are now drawing more than 50 μA and are in violation of part 68 were at one time our customers and now they think they can draw additional power and the FCC will not enforce part 68.

To help the FCC enhance part 68 enforcement I have compiled a list of manufacturers and their products that I believe are drawing more power than allowed. After talking to our testing lab. They informed me that these products would not pass there part 68 testing and the limits are 50 μA at 5 meg ohms measured at 1 to 100 volts. And this equates to a lot less than 50 μA that is allowed. Part 68 doesn't allow a product to go off hook and draw power to charge a battery or a super capacitor. Also, the limits of power draw is measured when the equipment is in use, in case of message waiting indication when the LED is flashing. And in measuring Caller ID equipment it's the power draw when using features like programming and scrolling through the name and numbers that has called and not just when it's in a power save mode.

List of products and manufacturers that draw more power than allowed

**Telematrix**

1. Model # LP550 line powered Caller ID telephone  
   Draws 1,200 μA all the time
2. Model # SP100-FSK  
   We didn't have one to test but they didn't list a transformer or batteries and list the power at 20μA to 100μA. You would need to draw about 100 μA to turn on a LED for the CLASS/FSK message waiting light.

**Scitec**

1. Model # 5S-c line powered Caller ID telephone  
   Draws about 100 μA when message waiting LED is on and when you scroll through the name and numbers it draws 1,600 μA and when it needs to charge a super capacitor it will take the telephone off hook and draws 1,600 μA. And when it needs to charge when the telephone is off hook and a person is talking it will mute the receiver drawing 1.600 μA and put a squeal on the line on the other end.
2. Model # 2860C Caller ID telephone  
   I think it is line powered but I don't have one to test.
3. Model # STC7003 Caller ID telephone  
   Model # STC702 Single line telephone  
   Model # STC701 Single line telephone  
   Model #HDST-12 Single line telephone  
   All these models states no batteries or AC adapter and uses line powered technology. I don't have the telephone to test.

Cortelco

1. Model # 8780 line powered Caller ID telephone  
   The power draw with the message waiting on was 45 uA, I don't know what it would be when measured at 5 meg Ohm and 1 to 100 volts. When scrolling threw the name and numbers it draws 800 uA well outside part 68 specifications.

Kingtel

1. Model # KT-4126MH line powered Caller ID telephone. It look like they manufacture the Cortelco Model # 8780  
   I don't have sample to test to get any power draw but I believe they will draw the same as the Cortelco 8780 and they are exporting them to North America.

Bittel USA, Inc.

1. Model 30 CID B-S.