Text from email from Bob Buck (8/12/10):

Jean-Paul; I would like to attend the meeting via conference bridge. I would also like the Council to add to the meeting agenda if possible a discussion on the status of the ACTA complaint filled December 10, 2008 with the FCC Enforcement Bureau.The complaint deals with telephone manufacture drawing more power from the telephone line then part 68 allows. The list of telephone manufactures and products has substantially grown in the past two year, and the amount of power that these products draw may cause problem with the public network. I can provide you with a up to date list of products I believe that are not in compliance with part 68.

Thank you

Bob Buck

President

Telephone Equipment Supply, Inc

218-246-2326

bob@tesmw.com

Follow up email from Bob Buck (8/13/10):

Kerrianne; These are the telephone manufacture and Caller ID products that uses more power from the telephone line then part 68 allows.

Scitec -Model STC-7003 Line Powered Caller ID Telephone
-model 5S-c Line Powered Caller ID Telephone
- Model 2860C Line Powered Caller ID Telephone
- Model STC7003 Line Powered Caller ID Telephone
- Model STC702 Line Powered Telephone With FSK Message Waiting Light
- Model STC701 Line Powered Telephone With FSK Message Waiting Light
- Model HDST -12 Line Powered Telephone with FSK Message Waiting Light

Telematrix - Model LP550 Line powered Caller ID Telephone
- Model SP550 Line Powered Caller ID Telephone
- Model SP100-FSK Line Powered Telephone With FSK Message Waiting Light

Teledex- Model B120D Line Powered Caller ID Telephone

at&t - Model CL2909 Line Powered Caller ID Telephone
- Model CL4939 Line Powered Caller ID Telephone
- Model CL2939 Line Powered Caller ID Telephone

Cortelco - Model 8780 Line powered Caller ID Telephone
- Model 2730 Line Powered Caller ID Telephone
- Model 2730E7 Line Powered Caller ID Telephone
- Model ITT-220421-VBA-27E Line Powered Telephone With FSK Message waiting
- Model 7 Series Line Powered Caller ID Telephone
- Model 2211-TP2-27E Line Powered Caller ID Telephone

DX deal extreme- Model SKU 12729 Line Powered Caller ID

Bittel - Model 30 CID B-S Line Powered Caller ID Telephone
- Model 58 Series Line Powered Caller ID Telephone

Kingtel - Model KT-4126MH Line Powered Caller ID Telephone
-Model KT-4131C

The Telephone Companies work with the FCC and other Association to limit the amount of power that can be drawn from the Public Network limiting the amount of power to 50 uA. at 5 meg ohm. These changes were made in 1997 to prevent possible damage to the Public Network.

I have tested most of these product and they draw 800uA to 1,800 uA well over the limits set in FCC part 68.

Second Follow up email from Bob Buck (8/13/10):

Kerrianne; I would like to correct and remove one manufacture of line powered Caller ID Telephone from the list I sent you. When I did a current search of manufactures of line powered Caller ID Telephone I found three model made by at&t that advertise they were Line Powered with no transformer and did not list they needed batteries. I was not aware that at&t was manufacturing a line powered Caller ID Telephone so I ordered one and tested it. The telephone was Line Powered and didn't require a transformer but the Caller ID did not work unless you installed four AA batteries that they did not list in there sales literature. These telephones do not draw more power then part 68 allowed. Please removed at&t from the list.

Thank you
Bob Buck

ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS (ACTA)

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 manufacture are drawing more then 50uA of power that is allowed from the public telephone network under part 68 when the telephone is on hook. These manufactures advertise there product for use behind Centrex and residential telephone lines and when you confront them that the FCC part 68 allows only 50 uA to be used they will tell you it's for PBX use. Thy are clearly marketing to distributor, dealers State, federal local governments, Telephone Company's and residential user's.

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

I would like to disclose that we are the only manufacture of line powered message waiting light and Caller ID units that received FCC approve before changes limiting the power draw in 1997 to 50 uA. Some of the telephone manufactures that are now drawing more then 50 uA and are in violation of part 68 were at one time our customers and now they think thy 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 manufactures and their products that I believe are drawing more power then 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 uA at 5 meg ohms measured at 1 to 100 volts. And this equates to a lot less then 50 uA that is allowed. Part 68 doesn't allow a product to go off hook and draw power to charge a batteries or a supper 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 programing and scrolling threw the name and numbers that has called and not just when it's in a power save mode.

List of products and manufactures that draw more power then allowed

Telematrix

1. Model # LP550 line powered Caller ID telephone
   Draws 1,200 uA 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 20uA to 100uA. You would need to draw about 100 uA 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 uA when message waiting LED is on and when you scroll threw the name and numbers it draws 1,600 uA and when it needs to charge a supper capacitor it will take the telephone off hook and draws 1,600 uA. 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 uA 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
2. Model #KT4131C, KT-9311MH,KT-4226MH,KT-4227MH,KT-4130C,KT-4128C,KT-4127C,KT-4200E,KT-4118C,and KT-4120E.
   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.

Sittelle
TECHNOLOGIES

August 7, 2008

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

ADMINISTRATIVE COUNCIL FOR TERMINAL ATTACHMENTS 68

1200 G Street NW Suite 500 Washington, DC 20005
Phone: 202-628-6380 Fax: 202-393-5453 Web: www.part68.org

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