

**From:** Borgmann, Holly  
**Sent:** Wednesday, August 03, 2016 1:47 PM  
**To:** Fredette, Richard (DFS)  
**Cc:**  
**Subject:** ADT Security Systems Comments on Proposed Smoke Detector / Alarm Regulations

Dear Mr. Fredette,

I am writing on behalf of ADT, the largest provider of residential security services in the country, to express our concerns with the third proposed amendment to the Massachusetts Comprehensive Fire Safety Code, 527 CMR 1.00: 13.7 to 13.10, which amends regulations relating to smoke detectors / alarms. We respectfully ask that the regulations be amended to exempt battery-operated smoke detectors / alarms connected to a monitored system from the 10-year, non-removable battery provision.

With more than 140 years of industry experience, ADT is committed to protecting and connecting our customers to what matters most – their families, homes and businesses. We fear that this change, while well-intended, could trigger serious unintended consequences, and public safety could suffer if agreed to as written.

This proposed regulation would require all battery-powered smoke detectors in the state to be powered by a non-removable 10-year battery. Unfortunately, these systems are not compatible with monitored life safety alarm systems, often considered the gold standard in fire protection. Because monitored smoke detectors constantly send data back to the alarm system's control panel, batteries drain more quickly. While technology has advanced, a battery capable of powering a monitored smoke detector for 10 years is not yet commercially available.

ADT's smoke, heat and carbon monoxide detectors are monitored 24 hours a day, seven days a week, by our monitoring centers, even if the system is unarmed, and even if no one is within earshot of the audible alarm. In the event of an emergency, a trained monitoring professional will attempt to contact the home or business owner, and if needed, request first responder assistance. When an ADT-monitored smoke detector's battery needs to be changed, ADT contacts the customer to alert them, and will either provide the customer with new batteries for the system, or send a technician to replace the batteries for them.

An unmonitored, 10-year battery-powered smoke detector will only protect an occupied building if someone hears the alarm. And at the end of its life, it will chirp periodically for one week, signaling that the entire device must be replaced. If the warning is missed, or if the owner cannot replace the device on their own, the home or business goes unprotected.

Similar language has been introduced in states around the country, and in each case, the state opted to amend the language to exempt battery-powered smoke detectors that connect to a monitored control panel. ADT asks that similar language be included in these proposed regulations, which will ensure that ADT, and others in the electronic security industry, can continue to provide best in class protection to its customers.

If you or your staff have questions or would like to meet and discuss this matter further, please contact me at (617) 426-1234.

Thank you for your time and consideration surrounding the issues of this matter.

Sincerely,

Holly Borgmann  
Director, Government Affairs  
ADT Security Services