

Section 889 of the FY19 National Defense Authorization Act November 19, 2018 I am writing to submit comments regarding the FY19 National Defense Authorization Act (NSAA) and how if implemented in a sweeping manner, it will cause long lasting damage to my small business.

I am the owner of JSM Secure, Inc., a local, family owned and operated full service security dealer located in Sheboygan Falls, Wisconsin. Our goal is to provide fast, friendly and professional service to our clients. JSM takes pride in installing the latest technology with our certified technicians and providing local Underwriters Laboratories (UL) monitoring services to all our clients for a low monthly rate. Furthermore, our staff attends annual security conferences to stay current with all the latest products available in the industry.

Since 2014, we have been a proud dealer of Hikvision USA, amounting to a significant part of our business. Thanks to Hikvision's industry-leading technology and commitment to cybersecurity, and our system designs keeping the cameras out of the customer's network and the internet, local businesses in Sheboygan Falls and surrounding areas can be assured that their property and assets can remain safe and secure.

After reading the relevant section of the NDAA on the video surveillance industry, it remains unclear what my business must do to comply with the law as it is written. Specifically, clear guidance that Section 889 of the NDAA does not apply to non-federal sales or use of covered equipment is critical to my company as I provide integrated security solutions across multiple governmental and commercial markets.

A broad implementation of Section 889 of this law would mean that I could no longer service my government contracts using products not covered by the prohibition while simultaneously covered products for any other commercial job. I doubt this was the intent, as this would cause severe distress to my small business. Due this issue, I have researched various alternatives to the HIKvision products that I am using and so far find them not nearly as good in performance, low light sensitivity and all around reliability as HIK. In addition, HIK has provided us with first rate sales and tech support as well as warranty support. In addition, it appears that some of my customers would be barred from entering into a federal contract if they have covered products installed in their facilities to protect their own property and staff. These customers would have to remove the covered products in such a scenario, causing significant disruption to their business and substantially increasing their operating cost. The Security Industry Association (SIA) recently sent its member companies an update that, from my perspective, helps lessen the potential downside a broad implementation would create on my business. As you begin your deliberations, please do keep these concerns in mind.

Sincerely,
Jeff Sohn
President, JSM Secure, Inc
N5764 County Road TT
Sheboygan Falls, WI 53085